



## Council for Responsible Nutrition

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**U.S. Pharmacopeial Convention  
12601 Twinbrook Parkway  
Rockville, MD 20852  
Submission by electronic email**

**Attention: Dr. Horacio Pappas ([hp@usp.org](mailto:hp@usp.org))  
[PFComments@usp.org](mailto:PFComments@usp.org)**

### **RE: Proposed Revisions to USP-NF General Chapter <467> on Residual Solvents**

The Council for Responsible Nutrition (CRN)<sup>1</sup> is the leading trade association for the dietary supplement and nutritional products industry, representing manufacturers of dietary ingredients and of national brand name and private label dietary supplements, many of which are multinational and already actively selling ingredients, finished products and services globally. CHPA, founded in 1881, is a national trade association representing manufacturers and distributors of over-the-counter medicines and dietary supplements.<sup>2</sup>

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<sup>1</sup> The Council for Responsible Nutrition (CRN), founded in 1973 and based in Washington, D.C., is the leading trade association representing dietary supplement and functional food manufacturers, marketers and ingredient suppliers. CRN companies produce a large portion of the functional food ingredients and dietary supplements marketed in the United States and globally. Our member companies manufacture popular national brands as well as the store brands marketed by major supermarkets, drug stores and discount chains. These products also include those marketed through natural food stores and mainstream direct selling companies. CRN represents more than 150 companies that manufacture dietary ingredients, dietary supplements and/or functional foods, or supply services to those suppliers and manufacturers. Our member companies are expected to comply with a host of federal and state regulations governing dietary supplements and food in the areas of manufacturing, marketing, quality control and safety. Our supplier and manufacturer member companies also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Learn more about us at [www.crnusa.org](http://www.crnusa.org).

<sup>2</sup> [www.chpa.org](http://www.chpa.org)

CRN, CHPA and their member companies marketing dietary supplements take note to the proposed revisions listed in the recent USP *Pharmacopeial Forum* (PF 41 (5)) published in September, 2015, with comments due on or before November 30, 2015. Specifically, CRN, CHPA and their member companies are concerned with and offer the following comments to the proposed revisions to the USP-NF General Chapter <467> on Residual Solvents, as this proposal now is poised to include dietary supplements and dietary supplement ingredients within the scope of this General Chapter.

It is our understanding, based on communications from USP and in USP Stimuli Articles, that USP's analytical methods and acceptance criteria in GC <467> aim for harmony with the International Conference on Harmonisation's (ICH) Technical Requirements for Registration of Pharmaceuticals for Human Use: ICH Guideline on Residual Solvents (Q3C). The "Objective" and "Scope" of the Q3C are:

#### **1. INTRODUCTION**

The objective of this guideline is to recommend acceptable amounts for residual solvents in pharmaceuticals for the safety of the patient. The guideline recommends use of less toxic solvents and describes levels considered to be toxicologically acceptable for some residual solvents. [**emphasis added**].

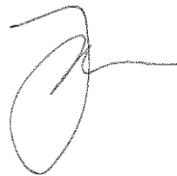
#### **2. SCOPE OF THE GUIDELINE**

Residual solvents in drug substances, excipients, and in drug products are within the scope of this guideline. Therefore, testing should be performed for residual solvents when production or purification processes are known to result in the presence of such solvents. It is only necessary to test for solvents that are used or produced in the manufacture or purification of drug substances, excipients, or drug product. [**emphasis added**].

We remind USP that dietary supplement components, including ingredients and products, are regulated as a category of foods, not drugs, in the U.S. Use patterns and safety standards are different between these categories and these differences should be taken into account when developing residual solvent limits for foods.

CRN, CHPA and their member companies respectfully submit these comments objecting to this proposal because it is inappropriate to simply extend <467> to dietary supplement components, including ingredients and products. ICH limits established for drugs may not be appropriate for dietary supplements and a separate approach should be taken to establish the applicability of <467> for dietary supplements. Just as USP employed a separate process to establish elemental impurities for dietary supplements that was distinct from drugs, CRN, CHPA and their member companies suggest that a similar exercise is required for dietary supplements with regard to residual solvents.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James C Griffiths', with a stylized, cursive script.

James C Griffiths, Ph.D., DABT, FSB, CFS  
Vice President, Scientific & International Affairs

A handwritten signature in blue ink, appearing to read 'Jay Sirois', with a stylized, cursive script.

Jay Sirois, Ph.D.  
Director, Regulatory & Scientific Affairs  
Consumer Healthcare Products Association

Electronic copies: Ms. Christine Feaster  
Dr. Gabriel Giancaspro  
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