# Q3C — Tables and List Guidance for Industry

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

[June 2017] ICH

**Revision 3** 

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#### I. INTRODUCTION

This is the companion document for the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) guidance for industry *Q3C Impurities: Residual Solvents*, which makes recommendations as to what amounts of residual solvents are considered safe in pharmaceuticals.

This document may be updated if proposals for change are submitted to the ICH Secretariat for consideration by the ICH Q3C Expert Working Group (EWG). If the EWG supports the proposal for change, the proposal will be submitted to the ICH Assembly for endorsement. Any proposals that are endorsed by the ICH Assembly will be announced through a notice in the *Federal Register* prior to the updating of this document. The guidance was revised in November 2003 to reflect updated recommendations for N-Methylpyrrolidone and Tetrahydrofuran, in February 2012 to reflect an updated recommendation for cumene, and in October 2016 to reflect updated recommendations for Triethylamine and Methylisobutylketone.

In general, FDA's guidance documents do not establish legally enforceable responsibilities. Instead, guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

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<sup>&</sup>lt;sup>1</sup> This document was developed within the Expert Working Group (Quality) of the International Council for Harmonis ation of Technical Requirements for Pharmaceuticals for Human Use (ICH) and has been subject to consultation by the regulatory parties, in accordance with the ICH process. This document was endorsed by the ICH Steering Committee at *Step 4* of the ICH process in July 1997. At *Step 4* of the process, the final draft is recommended for adoption to the regulatory agencies. This guidance was published in the *Federal Register* on December 24, 1997 (62 FR 67377), and is applicable to drug and biological products.

<sup>&</sup>lt;sup>2</sup> The information included for Methylisobutylketone reflects that included in the *Revision of PDE Information for Methylisobutylketone*, which reached *Step 4* in November 2016 and was subsequently incorporated into the core guidance.

# II. LIST OF SOLVENTS INCLUDED IN THE Q3C GUIDANCE

Solvent	Other Names	Structure	Class
Acetic acid	Ethanoic acid	CH₃COOH	Class 3
Acetone	2-Propanone Propan-2-one	CH <sub>3</sub> COCH <sub>3</sub>	Class 3
Acetonitrile		CH₃CN	Class 2
Anisole	Methoxybenzene	<b>∕</b> _≻осӊ	Class 3
Benzene	Benzol		Class 1
1-Butanol	n-Butylalcohol Butan-1-ol	CH <sub>3</sub> (CH <sub>2</sub> ) <sub>3</sub> OH	Class 3
2-Butanol	sec-Butyl alcohol Butan-2-ol	CH <sub>3</sub> CH <sub>2</sub> CH(OH)CH <sub>3</sub>	Class 3
Butylacetate	Acetic acid butyl ester	CH <sub>3</sub> COO(CH <sub>2</sub> ) <sub>3</sub> CH <sub>3</sub>	Class 3
tert-Butylmethylether	2-Methoxy-2-methyl-propane	(CH <sub>3</sub> ) <sub>3</sub> COCH <sub>3</sub>	Class 3
Carbon tetrachloride	Tetrachloromethane	CCl <sub>4</sub>	Class 1
Chlorobenzene		<b>⊘</b> -cı	Class 2
Chloroform	Trichloromethane	CHCl <sub>3</sub>	Class 2
Cumene	Is opropylbenzene (1-Methyl)ethylbenzene	$C_6H_5$ -CH(CH <sub>3</sub> ) <sub>2</sub>	Class 2
Cyclohexane	Hexamethylene	$\bigcirc$	Class 2
1,2-Dichloroethane	sym-Dichloroethane Ethylene dichloride Ethylene chloride	CH <sub>2</sub> ClCH <sub>2</sub> Cl	Class 1
1,1-Dichloroethene	1,1-Dichloroethylene Vinylidene chloride	H <sub>2</sub> C=CCl <sub>2</sub>	Class 1
1,2-Dichloroethene	1,2-Dichloroethylene Acetylene dichloride	CIHC=CHCI	Class 2

Dichloromethane	Methylene chloride	CH <sub>2</sub> Cl <sub>2</sub>	Class 2
1,2-Dimethoxyethane	Ethyleneglycol dimethyl ether Monoglyme Dimethyl Cellos olve	H <sub>3</sub> COCH <sub>2</sub> CH <sub>2</sub> OCH <sub>3</sub>	Class 2
N,N- Dimethylacetamide	DMA	CH <sub>3</sub> CON(CH <sub>3</sub> ) <sub>2</sub>	Class 2
N,N- Dimethylformamide	DMF	HCON(CH <sub>3</sub> ) <sub>2</sub>	Class 2
Dimethyl sulfoxide	Methylsulfinylmethane Methylsulfoxide DMSO	(CH <sub>3</sub> ) <sub>2</sub> SO	Class 3
1,4-Dioxane	p-Dioxane [1,4]Dioxane	<b>·</b>	Class 2
Ethanol	Ethylalcohol	CH <sub>3</sub> CH <sub>2</sub> OH	Class 3
2-Ethoxyethanol	Cellosolve	CH <sub>3</sub> CH <sub>2</sub> OCH <sub>2</sub> CH <sub>2</sub> OH	Class 2
Ethylacetate	Acetic acid ethyl ester	CH <sub>3</sub> COOCH <sub>2</sub> CH <sub>3</sub>	Class 3
Ethyleneglycol	1,2-Dihydroxyethane 1,2-Ethanediol	HOCH <sub>2</sub> CH <sub>2</sub> OH	Class 2
Ethylether	Diethylether Ethoxyethane 1,1'-Oxybisethane	CH <sub>3</sub> CH <sub>2</sub> OCH <sub>2</sub> CH <sub>3</sub>	Class 3
Ethylformate	Formic acid ethylester	HCOOCH <sub>2</sub> CH <sub>3</sub>	Class 3
Formamide	Methanamide	$HCONH_2$	Class 2
Formic acid		НСООН	Class 3
Heptane	n-Heptane	CH <sub>3</sub> (CH <sub>2</sub> ) <sub>5</sub> CH <sub>3</sub>	Class 3
Hexane	n-Hexane	$CH_3(CH_2)_4CH_3$	Class 2
Isobutylacetate	Acetic acid is obutyl ester	CH <sub>3</sub> COOCH <sub>2</sub> CH(CH <sub>3</sub> ) <sub>2</sub>	Class 3
Is opropyl acetate	Acetic acid is opropyl ester	CH <sub>3</sub> COOCH(CH <sub>3</sub> ) <sub>2</sub>	Class 3
Methanol	Methylalcohol	CH₃OH	Class 2
2-Methoxyethanol	Methyl Cellosolve	CH <sub>3</sub> OCH <sub>2</sub> CH <sub>2</sub> OH	Class 2
Methylacetate	Acetic acid methylester	CH <sub>3</sub> COOCH <sub>3</sub>	Class 3
3-Methyl-1-butanol	Isoamylalcohol Isopentylalcohol 3-Methylbutan-1-ol	(CH <sub>3</sub> ) <sub>2</sub> CHCH <sub>2</sub> CH <sub>2</sub> OH	Class 3

Methylbutyl ketone	2-Hexanone Hexan-2-one	CH <sub>3</sub> (CH <sub>2</sub> ) <sub>3</sub> COCH <sub>3</sub>	Class 2
Methylcyclohexane	Cyclohexylmethane	<b>⊘</b> -сн₃	Class 2
Methylethyl ketone	2-Butanone MEK Butan-2-one	CH <sub>3</sub> CH <sub>2</sub> COCH <sub>3</sub>	Class 3
Methylisobutylketone	4-Methylpentan-2-one 4-Methyl-2-pentanone MIBK	CH <sub>3</sub> COCH <sub>2</sub> CH(CH <sub>3</sub> ) <sub>2</sub>	Class 2
2-Methyl-1-propanol	Isobutylalcohol 2-Methylpropan-1-ol	(CH <sub>3</sub> ) <sub>2</sub> CHCH <sub>2</sub> OH	Class 3
N-Methylpyrrolidone	1-Methylpyrrolidin-2-one 1-Methyl-2-pyrrolidinone	N O CH <sub>8</sub>	Class 2
Nitromethane		CH <sub>3</sub> NO <sub>2</sub>	Class 2
Pentane	<u>n</u> -Pentane	CH <sub>3</sub> (CH <sub>2</sub> ) <sub>3</sub> CH <sub>3</sub>	Class 3
1-Pentanol	Amyl alcohol Pentan-1-ol Pentyl alcohol	CH <sub>3</sub> (CH <sub>2</sub> ) <sub>3</sub> CH <sub>2</sub> OH	Class 3
1-Propanol	Propan-1-ol Propylalcohol	CH <sub>3</sub> CH <sub>2</sub> CH <sub>2</sub> OH	Class 3
2-Propanol	Propan-2-ol Is opropyl alcohol	(CH <sub>3</sub> ) <sub>2</sub> CHOH	Class 3
Propylacetate	Acetic acid propylester	CH <sub>3</sub> COOCH <sub>2</sub> CH <sub>2</sub> CH <sub>3</sub>	Class 3
Pyridine		<b></b>	Class 2
Sulfolane	Tetrahydrothiophene 1,1-dioxide	0 8 0	Class 2
Tetrahydrofuran	Tetramethylene oxide Oxacyclopentane	$\bigcirc$	Class 2
Tetralin	1,2,3,4-Tetrahydro-naphthalene		Class 2
Toluene	Methylbenzene	<i>©</i> ≻сӊ	Class 2
1,1,1-Trichloroethane	Methylchloroform	CH <sub>3</sub> CCl <sub>3</sub>	Class 1
1,1,2-Trichloroethene	Trichloroethene	HClC=CCl <sub>2</sub>	Class 2
Triethylamine	N,N-Diethylethanamine	$N(CH_2CH_3)_3$	Class 3

Xylene <sup>1</sup>	Dimethybenzene	сӊ҈−сӊ₃	Class 2
	Xvlol		

<sup>&</sup>lt;sup>1</sup>Usually 60% m-xylene, 14% p-xylene, 9% o-xylene with 17% ethyl benzene.

#### III. SOLVENTS GROUPED BY CLASS

Solvents in Class 1 (Table 1) should not be employed in the manufacture of drug substances, excipients, and drug products because of their unacceptable toxicity or their deleterious environmental effect. However, if their use is unavoidable in order to produce a drug product with a significant therapeutic advance, then their levels should be restricted as shown in Table 1, unless otherwise justified. The solvent 1,1,1-Trichloroethane is included in Table 1 because it is an environmental hazard. The stated limit of 1,500 ppm is based on a review of the safety data.

Table 1. – Class 1 Solvents in Pharmaceutical Products (Solvents That Should Be Avoided)

Solvent	Concentration Limit (ppm)	Concern
Benzene	2	Carcinogen
Carbon tetrachloride	4	Toxic and environmental hazard
1,2-Dichloroethane	5	Toxic
1,1-Dichloroethene	8	Toxic
1,1,1-Trichloroethane	1,500	Environmental hazard

Solvents in Class 2 (Table 2) should be limited in pharmaceutical products because of their inherent toxicity. PDEs are given to the nearest 0.1 mg/day, and concentrations are given to the nearest 10 ppm. The stated values do not reflect the necessary analytical precision of determination. Precision should be determined as part of the validation of the method.

**Table 2. – Class 2 Solvents in Pharmaceutical Products** 

Solvent	PDE (mg/day)	Concentration Limit (ppm)
Acetonitrile	4.1	410
Chlorobenzene	3.6	360
Chloroform	0.6	60
Cyclohexane	38.8	3,880
Cumene	0.7	70
1,2-Dichloroethene	18.7	1,870
Dichloromethane	6.0	600
1,2-Dimethoxyethane	1.0	100
N,N-Dimethylacetamide	10.9	1,090
N,N-Dimethylformamide	8.8	880
1,4-Dioxane	3.8	380
2-Ethoxyethanol	1.6	160
Ethyleneglycol	6.2	620
Formamide	2.2	220
Hexane	2.9	290
Methanol	30.0	3,000
2-Methoxyethanol	0.5	50
Methylbutylketone	0.5	50
Methylcyclohexane	11.8	1,180
Methylisobutylketone <sup>2</sup>	45	4,500
N-Methylpyrrolidone	5.3	530
Nitromethane	0.5	50
Pyridine	2.0	200
Sulfolane	1.6	160
Tetrahydrofuran	7.2	720
Tetralin	1.0	100

 $<sup>^2</sup>$  The information included for Methylis obutylketone reflects that included in the  $Revision \ of \ PDE \ Information for$ Methylisobutylketone, which reached Step 4 in November 2016 and was subsequently incorporated into the core guidance.

Toluene	8.9	890
1,1,2-Trichloroethene	0.8	80
Xylene <sup>1</sup>	21.7	2,170

<sup>&</sup>lt;sup>1</sup>Usually 60% m-xylene, 14% p-xylene, 9% o-xylene with 17% ethylbenzene.

Solvents in Class 3 (Table 3) may be regarded as less toxic and of lower risk to human health. Class 3 includes no solvent known as a human health hazard at levels normally accepted in pharmaceuticals. However, there are no long-term toxicity or carcinogenicity studies for many of the solvents in Class 3. Available data indicate that they are less toxic in acute or short-term studies and negative in genotoxicity studies. It is considered that amounts of these residual solvents of 50 mg per day or less (corresponding to 5,000 ppm or 0.5 percent under Option 1) would be acceptable without justification. Higher amounts may also be acceptable provided they are realistic in relation to manufacturing capability and good manufacturing practice (GMP).

Table 3. – Class 3 Solvents Which Should Be Limited by GMP or Other Quality-Based Requirements

Acetic acid	Heptane
Acetone	Isobutylacetate
Anisole	Is opropyl acetate
1-Butanol	Methylacetate
2-Butanol	3-Methyl-1-butanol
Butylacetate	Methylethylketone
tert-Butylmethylether	2-Methyl-1-propanol
Dimethylsulfoxide	Pentane
Ethanol	1-Pentanol
Ethylacetate	1-Propanol
Ethylether	2-Propanol
Ethylformate	Propylacetate
Formic acid	Triethylamine <sup>3</sup>

 $<sup>^3</sup>$  The information included for Triethylamine reflects that included in the *Revision of PDE Information for Triethylamine*, which reached *Step 4* in November 2016 and was subsequently incorporated into the core guidance.

The solvents listed in Table 4 may also be of interest to manufacturers of excipients, drug substances, or drug products. However, no adequate toxicological data on which to base a PDE were found. Manufacturers should supply justification for residual levels of these solvents in pharmaceutical products.

## Table 4. - Solvents for Which No Adequate Toxicological Data Were Found

1,1-DiethoxypropaneMethylisopropylketone1,1-DimethoxymethaneMethyltetrahydrofuran

2,2-Dimethoxypropane Petroleumether

Isooctane Trichloroacetic acid
Isopropylether Trifluoroacetic acid