VIA ELECTRONIC SUBMISSION

February 14, 2022

Food and Drug Administration
Division of Dockets Management
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket No. FDA–2021–D–0241 for ''Inspection of Injectable Products for Visible Particulates''

Dear Sir/Madam,

The United States Pharmacopeia (USP)[1] appreciates the opportunity to comment on the Food and Drug Administration's (FDA or the Agency) Draft Guidance for Industry, "Inspection of Injectable Products for Visible Particulates."

We commend FDA on the issuance of this draft guidance to help ensure the quality of injectable products. USP strongly supports the Agency's efforts to minimize the public health risk caused by the contamination of particulates and establishing manufacturing controls to prevent such contamination.

USP supports the draft guidance's reference to the *United States Pharmacopeia-National Formulary* (*USP-NF*) chapters that are related to the visual inspection of particulates in injectable products,[2] in particular, USP General Chapters <790> *Visible Particulates in Injections* and <1790> *Visual Inspection of Injections*.

Additionally, USP recommends the following changes to further support or clarify certain language in the draft guidance.

Line Numbers	Draft Guidance Text	Recommendation
155-157	'"Manufacturers should also consider the potential sources of particulates, appropriate analytical methods to ~~**monitor**~~ **[characterize particulates]**, and mitigation strategies to prevent their presence in the final product" (emphasis added).	Change "monitor" to "characterize particulates," to align with USP <1790>, Section 8 "Products in Distribution."

[1] USP is an independent, scientific, nonprofit organization dedicated to improving public health for medicines, foods, and dietary supplements. USP public standards are developed through an open, transparent, expert-based process, offering the ability to confront public health emergencies, adapt to new industry practices, and support evolving science and technology.

[2] USP General Chapters <1> *Injections and Implanted Drug Products (Parenterals)—Product Quality Tests*; <787> *Subvisible Particulate Matter in Therapeutic Protein Injections*; <788> *Particulate Matter in Injections*; <790> *Visible Particulates in Injections*; <1790> *Visual Inspection of Injections*.

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166-169	“For **hard-to-inspect products** containing inherent particulates, such as suspensions or emulsions, manufacturers should develop supplemental testing methods to ensure adequate detection of visible particulates (see section V, Visual Inspection Program Considerations)” (emphasis added).	Change “hard-to-inspect” to “difficult to inspect” to align with USP <1790>, Section 5.2 “Unique Product and Container Considerations.”
257-259	"A visual inspection program should ensure that any visible particulates present in the batch at the time of release are only those that have a low probability of detection because they are of a size approaching the visible detection limit."	Include edits to clarify that a visual inspection program should ensure that any readily detectable particulates in the batch are removed upon visual inspection at the time of release, which is consistent with USP <1790> Sections 3.1, 5.1, 6.2, and 7.1.
317-319	"Some inspection equipment does not require controlled separate facilities for visible particulate inspection."	Provide clarification and/or example.
324-346	Language on automated inspections	Include reference to USP <1790>, Section 6.3 “Automated Visual Inspection.”
390-391	“Opaque products and containers (e.g., lyophilized powders, suspension products, tinted vials) present obvious challenges to visual inspection.”	Include mention of amber vials, consistent with USP <1790>, Section 5.2. “Unique Product and Container Considerations.”
547-555	Language on reinspections	Include reference to USP <1790>, Section 3.3 “Remediation and Alternative Practices.”

USP is committed to minimizing the public health risk caused by the contamination of particulates and would welcome engaging further with FDA on this topic.

Thank you again for the opportunity to comment. For more information, please contact Marissa Chaet Brykman, Esq., Director, U.S. Regulatory Policy, at marissa.brykman@usp.org; (301) 692-3660.

Sincerely yours,

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