

Acetonitrile Shortages: Recommendations for Reporting Changes in Analytical Procedures

FDA has received several inquiries related to reported shortages of acetonitrile, a chemical that is widely used in analytical procedures for drug substances and drug products. This shortage could potentially affect a firm's ability to perform testing necessary for release and distribution of a product and, in turn, warrant changes in analytical procedures to reduce or eliminate the need for acetonitrile. FDA believes that existing reporting requirements provide a minimally burdensome submission pathway by which to report such changes, as they allow for some of these changes to be submitted through a firm's annual report.

Specifically, the following two resources allow for certain alternative analytical procedures to be submitted in an annual report:

- FDA guidance for industry, [*Changes to an Approved NDA or ANDA Revision 1*](#), see Section VIII.D.2 and VIII.D.4.
- [*Code of Federal Regulations*](#), "Supplements and Other Changes to an Approved Application," see 21 CFR 314.70(d)(2)(vii).

The guidance and regulations also discuss other situations that firms may come across. For example, the guidance states that the addition of, or major changes to, a regulatory analytical procedure should be submitted in a prior-approval supplement (see Section VIII.B), while the regulations state that with certain exceptions, changes to specifications also would require a prior-approval supplement (see 21 CFR 314.70(b)(2)(i)).

Regardless of the changes a firm makes to address the shortage, appropriate method validation and compliance with relevant current good manufacturing practices (CGMPs) are necessary. This CGMP information will be evaluated during onsite inspection.