

2023 Single-Use Pulse Webinar Series

# IMPLEMENTATION OF X-RAY STERILIZATION OF SINGLE-USE SYSTEMS: WHAT TO EXPECT

Thursday, March 9, 2023
 10 - 11:30 AM EST



Presenters

Samuel Dorey, Sartorius James Hathcock, Pall Corporation

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Color Pigments Manufacturers Association



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# Implementation of X-ray for Single-Use

Implementation Ramp-Up, Capacity & Risks

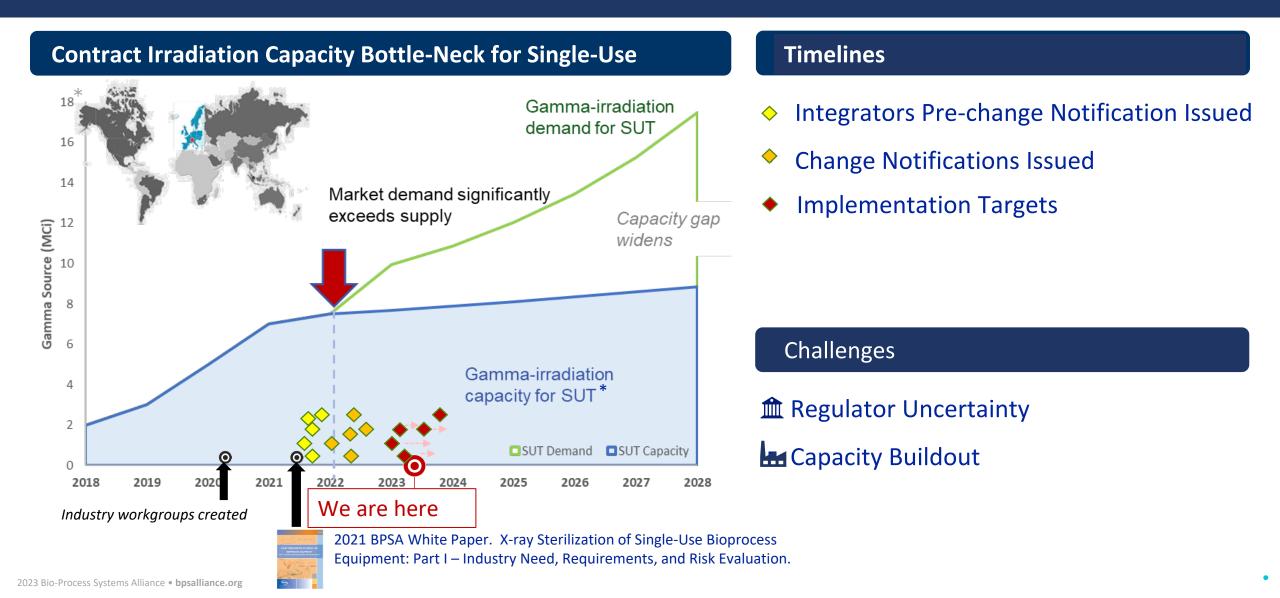
**BPSA X-ray Qualification Testing Paper** 

**Regulatory Perspectives** 

### **Staying Current**

## Implementation Ramp-Up







# Mapping of Irradiation Sites and Key Risks

### • Opening Dates

- Steris, Daniken (Switzerland) open
- Steris, Venlo (Netherland) open
- Steris, Libertyville (USA) June 2023 (TBC)
- Steris, Chomburi (Thailand) Summer 2023 (TBC)
- Steris, Suzhou (China) planned
- Others in pipeline
- Risks: additional delays
- Dose Mapping performed as within gamma sites
- Potential tension to Cobalt-60 supply due to current sanctions



# Implementation of X-ray for Single-Use

Implementation Ramp-Up, Capacity & Risks

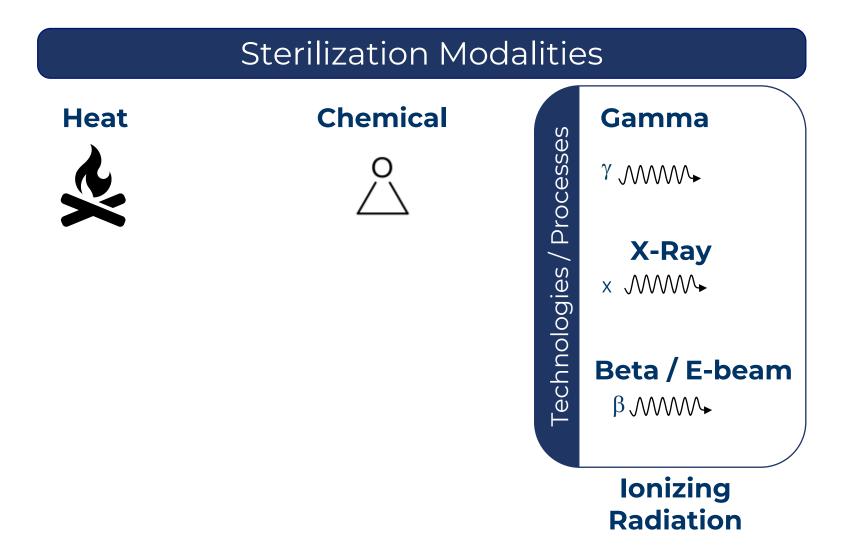
BPSA X-ray Qualification Testing Paper

**Regulatory Perspectives** 

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## Sterilization Modality or Technology





# 2021 BPSA X-ray Assessment White Paper



Responses to radiation for different polymers intrinsically related to the chemical structures of the polymers

- Focus on polymers with limited irradiation compatibility (worst case)
- Couple material-science assessments
   with component testing
- Not retest every component.
- Demonstrate existing data packages remain valid for X-ray



Bags &

Film









Sensors

Tubing (TPE, Silicone)

Filters

Aseptic Connectors

		Good irradiation compatibility at 50kGy				Limited compatiblity at 50 kGy Poor				or													
	HDPE	LDPE	PC	PEEK	PEI	РЕТ	PS	PSU	PUE	PVDF	EPDM	Polyamide (Nylon)	РВТ	PES	РР	PVC	Silicone	TPE	FEP	PTFE	PEBA	Functionalized Materials	Cellulose
Compatiility with Ionizing Radiation											$\triangle$	$\triangle$	$\triangle$	$\triangle$	$\triangle$	$\triangle$	$\triangle$	$\triangle$			-	-	$\triangle$
Connectors							•	•						•			•	•					
Containers (bags, bottles, carboys)																							
Ports on containers													•				•						
Sensors													•	-				•					
Tubing																		•					
Filters										•			•									•	
TFF devices														•									
Fittings and molded parts										•													
Pumps, check valves											•				•			•		•			
Needles															•								
O-rings, Gaskets, Seals											•						•						
Packaging															•								

## Materials Impact Assessment

### **Material Assessments**

- FTIR. Chemical fingerprint
- **DSC.** Heat flow characteristics (melting temperature, crystallinity)
- **TGA.** Change in mass with thermal decomposition
- Mechanical. (components dependent)
- **DMA.** *Viscoelasticity* (components dependent)

### Good irradiation compatibility at 50kGy Limited compatiblity at 50 kGy Poor 120 Material Aaterials Assessments, **∨**(u ź Polyamide Silicone PDM PEEK VDF PUE PSU BT PES PET Ē ЪЕ Compatibility with Ionizing Radiation Connectors Containers (bags, bottles, carboys) Ports on containers Sensors Tubing Filters TFF devices Fittings and molded parts Pumps, check valves Needles O-rings, Gaskets, Seals Packaging

### 1<sup>st</sup> investigation level to assess X vs G impacts



### Key outputs



°. 0 0. The paper reflects multiple types of testing, data presentation and ways to Ξ evaluate the results A review of multiple datasets, from different components, materials IOUOo and suppliers, offers a robust holistic perspective In addition to the materials and component qualification supporting Xray, other evaluation criteria have been openly shared within the BPSA working group, but were outside the scope of this data-based review It shows the hypothesis mentioned in WP1 is right: same irradiation physics and thus equivalent impact  $\checkmark -$ 

# Part II. Representative Qualification Data

Draft pending BPSA board review

### X-Ray Sterilization of Single-Use Bioprocess Equipment. Part II – Representative Qualification Data

### Published by:

Bio-Process Systems Alliance (BPSA) 1400 Crystal Drive Arlington, VA 22202

CPC

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PendoTECH

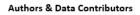
Saint Gobain

Sartorius

MilliporeSigma

Broadley-James

MilliporeSigma



Maria Bollensen Monica Cardona Samuel Dorey CD Feng James Hathcock Roger Hendrick Nicole Hunter Lan Luo Timo Neuman Lise Tan-Sien-Hee Nick Troise Andrew Trolio Gabrielle Wilson

### Acknowledgements

We want to thank the following people for their contribution to the development and review of this guide.

Watson-Marlow Fluid Technology Solutions

- Executive Summary
- Temperature and Activation with Radiation Processing
- Physical and Functional Component Data
- Chemical Tests
- Materials Assessments
- Biological Tests
- Assembly Integrity
- Conclusions and Next Steps
- Appendices





## Part II. Representative Qualification Data

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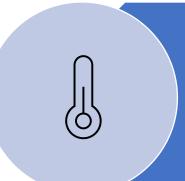
	Primary MOC	Materials	Physical	Functional	Chamical	Biological
Diagonatationa		watenais	FIIYSICAI	Functional	Chemical	Diological
Biocontainer						
Flexsafe <sup>®</sup> bag (S80 film)	PE's/EVOH	•	•	•		•
Connector						
Lynx <sup>®</sup> S2S	PSU, Sil	•	•	•		
<u>AseptiQuik</u> ® AQG	PC, PPSU, PE, PES, Sil	•	•		0	0
Filter						
Kleenpak™ EKV Capsule	PP, PES, EPDM	٠	• < (	$\triangleright$ •	٠	•
Sensor						
PendoTECH Single Use Pressure <u>Sensor™</u>	PSU	•		•		•
BroadleyJames pH Sensor	Glass, PEEK,	0 🖌	0	•	0	0
	EPDM, Si(Pt)		-			
Tubing						
Pumpsil <sup>®</sup> - Bioprene <sup>®</sup> -	Si(Pt)-TPV-	< <b>(</b> • )	•	•	O	٠
Pureweld®	SEBS 💦					
AdvantaFlex APAF	TPE 🔨 🚫		•	•	•	0
<u>Liveo</u> ™ Pharma Tubing	Si(Pt)	•	•	•		•
C-Flex <sup>®</sup> 374 Tubing	TPE	•	•	•	o	•
SaniTech <sup>®</sup> Ultra-C Tubing	Si(Pt)		•	•	o	•

# Temperature and Activation Associated with Radiation Processing



Tested materials irradiated at 55-80 kGy show no reports of significant activation

Average maximum temperatures experienced during gamma irradiation were 35-45°C vs 30-40°C with X-ray irradiated samples at 50±5kGy



## Overall assessment



### Materials

Ethylene propylene diene monomer (EPDM)

Polyamide (PA)

Polybutylene terephthalate (PBT)

Polycarbonate (PC)

**High-density polyethylene (HDPE)** 

Low-density polyethylene (LDPE)

Neodymium-containing magnet alloy

Polyether ether ketone (PEEK)

Polyethylene (PE)

Polyethylene terephthalate (PET)

Polyethylene terephthalate glycol (PETG)

Polyolefin (POE)

Polypropylene (PP)

Polysulfone (PSU)

Polyvinyl chloride (PVC)

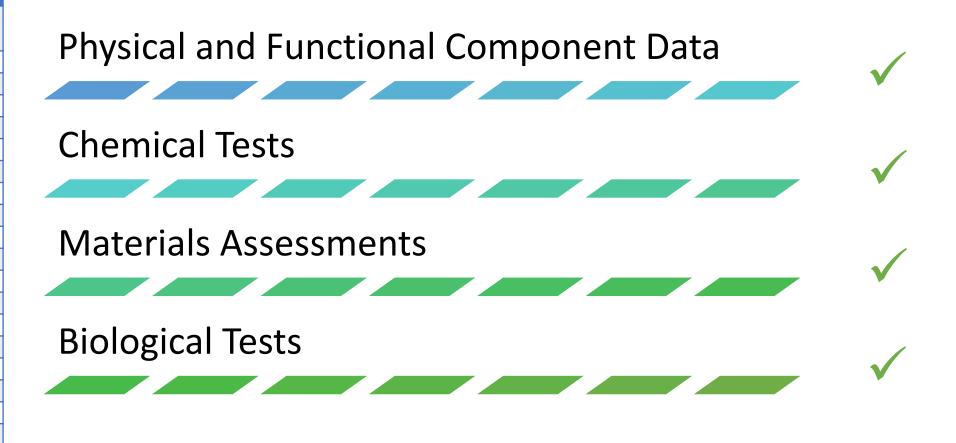
Polyvinylidene fluoride (PVDF)

Stainless steel (clamp)

Styrene-butadiene copolymer (SBC)

Silicone (Si)

Thermoplastic elastomer (TPE)





# Implementation of X-ray for Single-Use

Implementation Ramp-Up, Capacity & Risks

**BPSA X-ray Qualification Testing Paper** 

**Regulatory Perspectives** 

### **Staying Current**



# Regulator Engagement & Alignment

FDA ETT CDER Engagement 1 Dec 2021 2 Sept 2022

I X-ray appears new concept

## I Need cross functional expertise & data

- I Physicists, Single-use SMEs, Pharma manufacturers
- I Good vibes
  - I Sterility assurance ✓
  - I Functionality assessment ✓
- I Continued engagement
  - I Extractables (low/high pH)
  - I Case Studies

I MHRA/EMA Engagement Critical



# Transitioning from Gamma to X-ray

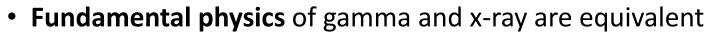
• ISO 11137 "Sterilization of Healthcare Products" covers gamma and X-ray

- ✓ No change to dose window (transfer of dose)
- ✓ Dose mapping required for new radiation sources/sites
- ✓ Sterility dose audits with X-ray will demonstrate continued effectiveness
- Activation studies demonstrate no meaningful radioactivity
- ✓ No impact to sterility assurance level (SAL)

"Dose mapping studies are well-described in ISO11137 and are to be coordinated by the SUS integrator for each unique irradiation site to verify the dose received for their product during routine manufacturing is between the minimum and maximum dose.

Sterility dose audits, also well described in ISO 11137 are also expected to be performed by the integrator to demonstrate the continued effectiveness of the ionizing irradiation process over time."

# Transitioning from Gamma to X-ray



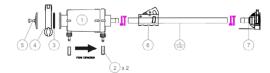
Gamma to X-ray is not a "modality" change (heat, radiation, gas)

### • Sponsor risk-assessment based on

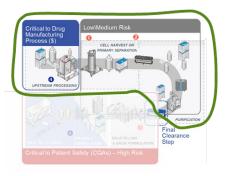
- ✓ Irradiation physics understanding
- Evaluation of wide range of representative materials
- Limited testing to "verify" equivalence, but not revalidate
- USP <665> "moderate risk" testing to assess leachables risk
- Case study Risk Assessments for post-approval changes

# Case Study Risk Assessment & Regulatory Notification Action

Case Study	Gamma mentioned in approved filing
Case A: Single-use filtration assembly in final sterilizing-grade filtration step of monoclonal antibody product	No
Case B: Single-use storage bag assembly for mixing and/or storage of formulation buffer	No
	Yes
Case C: Low risk applications ( <u>e.g.</u> associated with or upstream of clearance steps)	No



В



Authors Note: The assessments included in this document represent the consensus opinions of recognized subject matter experts in the pharmaceutical industry who have been actively engaged in industry groups and review panels focused on risk assessment and qualification of X-ray. This includes three team members currently employed in related risk assessment roles at different pharmaceutical manufacturers, and two team members from different single-use providers. Authors names and affiliations are indicated where allowed per company policy. As part of this process additional subject matter experts within companies have been consulted and existing regulatory filings reviewed to ensure in good faith and to the best of our ability that these case studies and assessments are largely representative of those expected in 2023 and beyond. These opinions represent those of the authors, and in most cases have not been formally reviewed and endorsed by their companies or industry organizations in which they participate

# Case Study Risk Assessment & Regulatory Notification Action

Case Study	Gamma mentioned in approved filing	Final Risk Determination (Gamma → X-ray)	Regulatory Notification Action	Agency Feedback
Case A: Single-use filtration assembly in final sterilizing-grade filtration step of monoclonal antibody product	No	Low Risk	Annual report	
Case B: Single-use storage bag assembly for mixing and/or storage of formulation buffer	No	Low Risk	Annual report	Annual Report*
	Yes	Low Risk	CBE-30	
Case C: Low risk applications ( <u>e.g.</u> associated with or upstream of clearance steps)	No	Low Risk	Non reportable	

\*Such changes, where compliant to ISO 11137 including dose mapping and sterility dose audit studies, may be documented in annual product quality review.

# Case Study Risk Assessment & Regulatory Notification Action

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	Yes	Low Risk	CBE-30	
Case C: Low risk applications ( <u>e.g.</u> associated with or upstream of clearance steps)	No	Low Risk	Non reportable	

### In Scope SUS & Applications

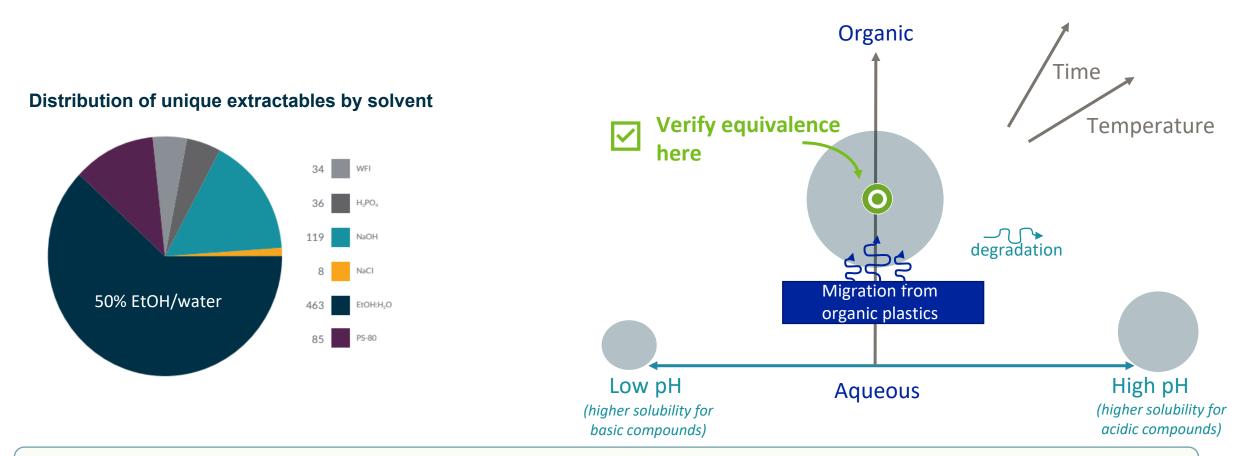
- ✓ Formulation buffer mixing & storage
- ✓ Final sterilizing filtration
- Many inherently low risk applications involving wide range of materials

### Not Yet in Scope

- ★ Final filling
- ✗ BDS storage
- Container closure (not SUS)
- \* will likely be implemented at future date

## Rationale for <665> Moderate Risk

50% EtOH/water extraction profile (referred to as <665> expanded baseline testing)

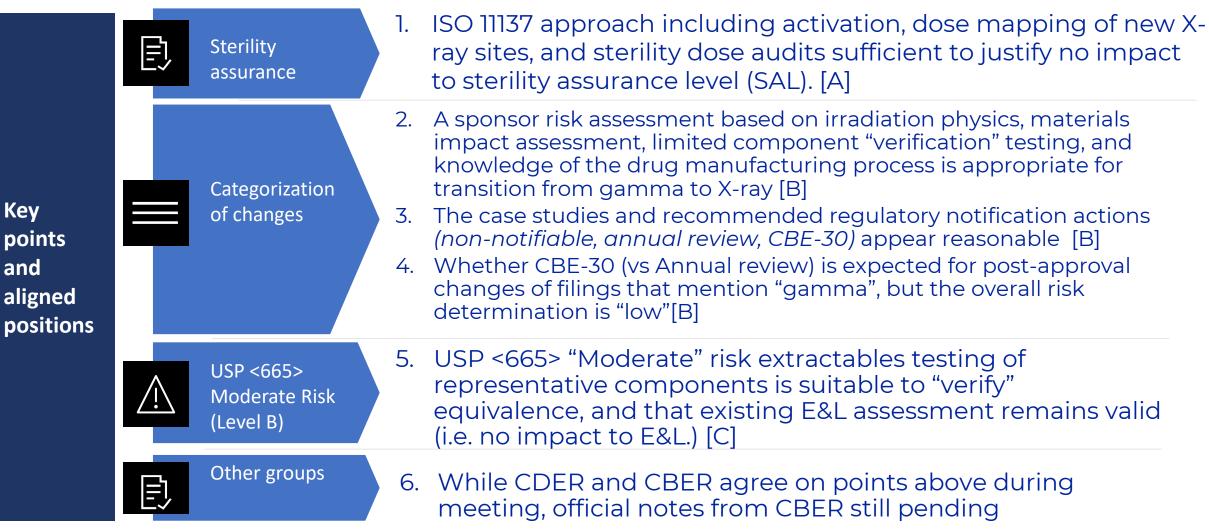


USP <665> Moderate risk testing of representative materials, coupled with materials testing, VERIFIES our understanding of the irradiation physics that X-ray is equivalent to gamma for single-use materials. The existing E&L risk assessment remains valid for X-ray.

Proof-of-concept data (low pH, high pH, high organic) for worst-case components confirm no unexpected effects related to X-ray.

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## ETT Engagement on X-ray Qualification Expectations for Single-Use Bioprocess Systems





## Regulatory Perspectives & Feedback

FDA ETT Engagement 1 Dec 2021 2 Sept 2022



### ETT Engagement on X-ray Qualification Expectations for Single-Use Bioprocess Systems

### 1 Executive Summary

Given the urgency to qualify X-ray as an alternative to Gamma for irradiation of single-use systems (SUSs), clear alignment is needed among suppliers, pharmaceutical manufacturers, and regulators on expectations for transition & commercia implementation. On September 8, 2022, a small industry team consisting of members of BioPhorum and BPSA. BARDA and subject matter experts met with the FDA/CDER/Emerging Technologies Team (ETT), including observers from CBER and EMA, to socialize and advocate for the positions published in the 2021 BPSA white paper on X-ray [1], and address concerns expressed by regulators during a prior, December 2021 Type C meeting with the ETT. Specifically, these concerns focused on the need for (I) examples of how sponsors would assess, categorize, and notify authorities when implementing a change, as well as (II) proof of-concept extractables data for representative worst-case components which verify that there are no unexpected effects under low pH, high pH, or high organic content. The package included (i) the follow-up Type C meeting request which identified key questions on which agency feedback was desired; (ii) the May 2021 BPSA whitepaper; (iii) a recently finished & to-be published technical paper demonstrating the comparability of X-ray and Gamma irradiation physics; (iv) the December 2021 CDER/ETT Type C meeting minutes; (v) a report consisting of 3 primary examples of post-approval changes and additional supporting rationale for the BPSA-recommended approach to extractables & leachables verification testing; and (vi) a general letter of support for the risk-based approach to assessment, verification, and notification of changes from BioPhorum. Following a detailed, interactive discussion on September 8, formal meeting minutes were received from the agency on September 20. 2022 The FDA's summary and description of the consensus met were consistent with the understanding of the industry participants. were regarded as highly positive to the advancement of the initiative, and aligned with the industry's need for practical, risk-based approaches to the transition to X-ray sterilization.

The key questions and responses in the attached meeting minutes address those posed in the meeting request. A brief overview of the key points and aligned positions is below.

### A. Sterility assurance

Sterility assurance concerns around transfer of dose from gamma to x-ray may be addressed per ISO 11137 [2] [3]. Specifically, (i) sterility assurance levels may be considered independent of the source-of photon-based irradiation, as established according to ISO 11137-2; (ii) the x-ray minimum dose may be substantiated through sterility dose audit experiments as described in ISO 11137-2; and (iii) dose mapping studies for each process shall establish that the minimum and maximum dose requirements are achieved by operating within established process settings.

The comments also note that if there is a need to increase the irradiation dose range compared to what was validated for a Gamma sterilization process, then additional studies would be warranted. This case, although worthwhile to consider in the hypothetical, is not expected to manifest with transfer from Gamma to X-ray. Regardless, dose mapping studies will confirm that pre-established dose ranges remain unchanged in transitioning processes.

### B. Categorization of changes

Post approval changes that follow the requirements of ISO 11137, and are deemed to be low risk as per the biomanufacturer's assessment may be submitted as part of the Annual Product Quality Report (APQR). This applies to changes that may be used in critical applications such as (A) final, sterilizing-grade fitration assemblies. (B1) formulation buffer mixing assemblies. (B2) applications in which "Gamma irradiation" may have been specifically identified in applicable regulatory filings, or (C) assemblies used in inherently low-risk applications distant to the patient and final drug product. Meeting Minutes: T) and BARDA (with Pall Corporation and partners)

ock, PhD, Sr. Director of Regulatory & Validation Strategy ion & BPSA Task Force Lead

y, PhD, Principal Scientist of Materials and Irradiations, lopment

lim Biotech & BPSA Task Force Lead 'hD, Director of Research & Development maceutical Companies of Johnson and Johnson 'ritical Material Management Lead, Sanofi S.A.

Sr. Process Engineer, BioMarin Pharmaceutical ;, PhD, Applications Physicist and Head of the Neutron icility, Fermi National Accelerator Laboratory (Fermilab), US

es, Global Sterility Assurance Director, Cytiva Life Sciences he Irradiation Panel

Jotzbuecher-Cruz, Senior Biomedical Engineer, DA/PCI/PVPCR Branch on, PhD, Domestic Alternative Technology Portfolio

E/National Nuclear Security Agency/Office of Radiological

nan, Supply Chain Management Lead, DA/Division of Pharmaceutical Countermeasures ; (PCI)

, Chief of Pandemic Vaccine Preparedness Capabilities & VPCR) Branch, DHHS/BARDA/PCI

Drug/Vaccine Supply Chain Manager, Tunnell Government

- Anabela Marca, EMA Liaison to FDA (invited by BARDA)
- Maria Jesus Alcaraz Tomas, Regulatory Science & Innovation Task Force, Supply & Availability of Medicines & Devices, EMA (invited by BARDA)
- · Brian Dooley, Pharmaceutical Qualify Office, EMA (invited by BARDA)

### All Meeting summary and minutes available



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Implementation Ramp-Up, Capacity & Risks

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### **Staying Current**

# Recent Publications



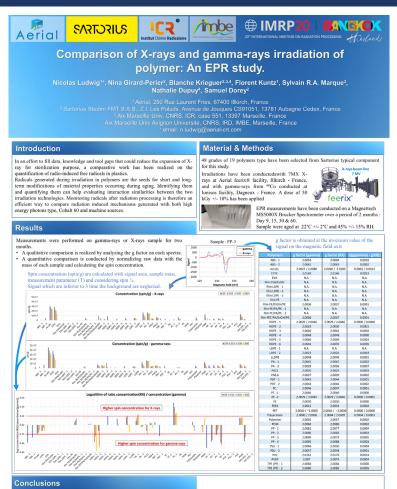
Arthur Charlesby	<ul> <li><u>https://doi.org/10.1016/B978-1-4831-9776-0.50007-3</u> (1960!)</li> </ul>
Fermilab	<ul> <li><u>https://doi.org/10.1016/j.radphyschem.2022.110702</u> (2023)</li> </ul>
Team Nablo	<ul> <li><u>https://doi.org/10.1016/j.radphyschem.2020.109282</u> (2021)</li> <li><u>https://doi.org/10.1016/j.radphyschem.2021.109505</u> (2021)</li> <li><u>Supplementing Gamma Sterilization – BioProcess</u> (2022)</li> <li><u>InternationalBioProcess International (bioprocessintl.com)</u> (2022)</li> <li><u>https://doi.org/10.3389/fchem.2022.888285</u> (2022)</li> </ul>
Sartorius	<ul> <li><u>https://doi.org/10.1039/D1CC02871E</u> (2021)</li> <li><u>https://doi.org/10.1002/btpr.3214</u> (2021)</li> <li><u>https://doi.org/10.1016/j.ijpharm.2023.122677</u> (2023)</li> <li><u>https://dc.engconfintl.org/sut_v/55/</u> (2022)</li> </ul>
Pall	<ul> <li><u>https://dc.engconfintl.org/sut_v/54/</u> (2022)</li> <li>Biotechnology Progress (Grzelak et al., in press) (2023)</li> </ul>
Activation	<ul> <li><u>https://doi.org/10.2345/0899-8205-55.s3.17 (2021)</u></li> </ul>
Miscelleneous	<ul> <li><u>https://doi.org/10.1016/j.radphyschem.2007.01.014</u> (2007)</li> <li><u>https://doi.org/10.1016/j.radphyschem.2022.109999</u> (2022)</li> </ul>

### Recent Conferences



Single-Use Technologies V Building The Future (Marseille, France, March 2022)	<ul> <li><u>http://engconf.us/conferences/biotechnology/single-use-</u> technologies-v-building-the-future/</li> </ul>
Kilmer (Athens, Greece, June 2022):	• <u>Kilmer Conference</u>
ICARST (Vienna, Austria, August 2022):	• <u>News: Second International Conference on Applications of</u> <u>Radiation Science and Technology (ICARST-2021)   IAEA</u>
IARC (Sept 2022)	• Medical Device Sterilization Workshop (videos online)
IMRP (Nov 2022) :	• International Meeting on Radiation Processing (imrp-iia.com)
To be continued in 2023	

# Insights in Materials Impact Assessment



In a qualitative point of view, each material exhibits similar EPR spectra when irradiated with X-rays or gamma-rays. This suggests that same radicals are measured and thus, occurring radiation induced mechanisms are very comparable. In a quantitative point of view, a large mujority of the 48 materials did not show a significant radical concentration difference produced when irradiated with gamma-rays or X-rays.

As a general trend X-rays and gamma-rays irradiation can be consider similar regarding radicals' creation

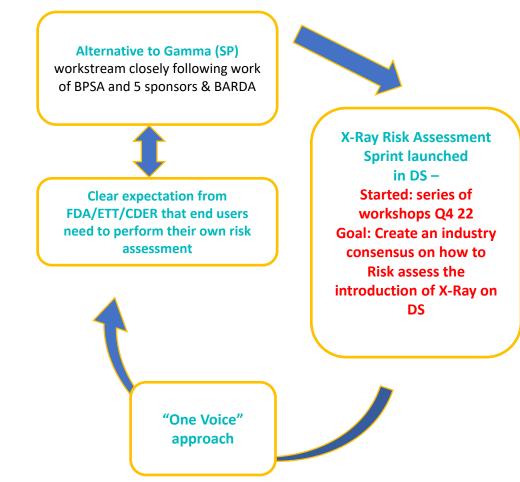


- Radiation interaction effects between matter and Gamma- & X-ray investigated
- Radicals tracked by EPR (Electron paramagnetic resonance or electron spin resonance (ESR)) spectroscopy
- Same nature of radicals and equivalent quantity after gamma and X-ray irradiation
- → Key interaction outputs equivalent after gamma and X-rays

# BioPhorum X-Ray Sterilization Risk Assessment Sprint Workshop



### Sharing questions & understanding



The team are aligned on what we want to deliver

Want to reach an industry consensus while embracing the viewpoints of all stakeholders (not every company has the same approach to RA)

Clear decision to focus on low/medium risk (common approach by all biomanufacturers and suppliers) to first implement and to further assess the high risk applications

Consensus approach in preparation; if not, different approaches can be reported to regulatories

X-ray implementation on low/medium risks in 2023 and in 2024/2025 for high risks

# ASTM Workshop E55/E61

(BPSA)

Radiation Processing for the Pharmaceutical and BioPharmaceutical Industries Training Workshop, May 8-9, 2023

- The objective of this workshop is to enhance the knowledge and understanding of the radiation process and critical requirements needed for the sterilization of components and finished products using radiation technologies
- <u>Radiation Processing for the Pharmaceutical and BioPharmaceutical</u> <u>Industries Training Workshop (eventscloud.com)</u>
- This workshop is powered by the ASTM E61 International Workshop on Radiation Processing but focused on and tailored for the individuals supporting the pharmaceutical and biopharmaceutical industries



**Registration Open** 

## Thank You BPSA X-Ray Committee!

# BPSA

### Kirsten Strahlendorf, Sanofi Pasteur Board Sponsor

### **Committee Participants**

Janmeet Anant, MilliporeSigma Ken Baker, AdvantaPure/NewAge Nick Troise, PendoTECH Dennis Annarelli, PendoTECH Amit Bhatt, Merck John Murphy, Merck MSD Andrew Trolio, AdvantaPure/NewAge Monica Cardona, MilliporeSigma Timo Neumann, Merck Millipore Samuel Dorey, Sartorius Stedim FMT Chad Kratochwill, Entegris Charlotte Massy, GSK CD Feng, Broadley James James Hathcock, Pall Noel Long, Cytiva Rafael Rodriguez, Cytiva Jeff Carter, Cytiva Dominic Moore, Sanofi Pasteur Kirsten Strahlendorf, Sanofi Pasteur Ravi Narayanan, Nordson Maria Bollensen, CPC Gary Harris, CPC

### Samuel Dorey, Sartorius James Hathcock, Pall Committee Co-Chairs

Larry Nichols, Steritek Paul Calverly, Sterigenics Jeffrey Noyes, Steris Deepak Patil, Steris Cody Wilson, IBA Ariana Gleisberg, Thermo Fisher Nicole Hunter, Watson Marlow Gabrielle McIninch, St Gobain Max Blomberg, Meissner Roger Hendrick, Dupont Lan Luo, Pall

## Questions & Discussion





Implementation Ramp-Up, Capacity & Risks

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