

Re: Nalcrom Quality Concerns Update

August 8, 2021

Beginning in December of 2020, the Mastocytosis Society of Canada (MSC) began receiving reports from patients of concerns regarding Nalcrom. The medication Nalcrom (also known as Cromolyn Sodium Oral) is recognised as a first line therapy in the management of the symptoms of mast cell disorders which include abdominal pain, diarrhea, nausea, bone pain, cognitive dysfunctions, and anaphylaxis. Nalcrom is recognized as a "mainstay" or "key" medication for patients with mastocytosis and other related mast cell disorders. Canadian patients rely exclusively on Sanofi Canada to supply Nalcrom as there is no other approved version of this medication in Canada.

Following these reports, MSC conducted a patient survey from February 12, 2021, to March 15, 2021. Of 55 returned surveys, thirty-nine (39) reported physical changes to the medication (significantly less full capsules and dissolving challenges). Upon follow up, 22 reports of adverse events were coincident with the commencement of batches with identified appearance changes. Adverse events included reports of anaphylaxis (4, including 3 reports of multiple instances of anaphylaxis), gastrointestinal symptoms (18), allergic-like symptoms (14, including hives, flushing, itching) and one (1) pediatric case. Eight (8) respondents indicated that their adverse reactions were eliminated by returning to older Nalcrom batches or compounded cromolyn sodium. For a complete summary of the survey results see [the report](#) on our website and [the additional updates](#) we have provided.

Post-Shortage Update on Quality Concerns with Nalcrom

Sanofi Canada declared a shortage on March 3, 2021, that was extended on April 23, 2021 to May 21, 2021. The shortage was declared resolved May 21 2021 on the [Health Canada drug shortages website](#). During this almost 3-month period, patients reliant on Nalcrom for symptom management of their rare disease had no access to any alternative option(s) to replace this medication.

After the shortage was declared resolved by Sanofi on May 21, 2021, patients continued having difficulty accessing Nalcrom from their pharmacy well into July, 2021. Of the few patients who have been able to access the new batch of Nalcrom released after the shortage (Lot 00078N and lot 00104N; exp. Mr/24), 8 have reported continued issues with the quality of the Nalcrom capsules, citing nausea, diarrhea, abdominal pain, anaphylaxis and an overall increase in symptoms.

We have been informed by at least 4 patients that their adverse events were reported to Sanofi Canada since June, 2021 using the new batches of Nalcrom (00078N and 00104N). While this may appear to be a reduction in reports of adverse events since the release of the June 2021 Nalcrom batches, we would like to highlight that many patients have informed us they have either have not been able to access the latest Nalcrom batch from their pharmacy or have entirely switched to compounded sodium cromoglycate while quality issues remain

unresolved.

All MSC survey respondents have been encouraged to report adverse events directly to Sanofi Canada and Health Canada. An examination of the [Health Canada Adverse Event Database](#) also points to a spike in adverse event reporting on the drug Nalcrom since December 2020. There have been a total of 41 AE reports on Nalcrom since 1982. Between 1982 and 2019, there were a total of 23 for a rate of 0.62 adverse event reports per year. Between December 18, 2020 and March 31 2021, there have been 18 adverse event reports. This is equivalent to a rate of 54 adverse events per year. This represents an 87-fold increase in adverse event reporting. The database does not show any reports beyond March 31, 2021, however based on our communications with our rare disease patient population we expect there to be more. We have reached out personally to every patient that has reported adverse events to MSC to confirm that they have also reported this to Health Canada and Sanofi Canada. We are continuing to follow up with patients to encourage further adverse event reporting.

Quality concerns with the drug Nalcrom is an ongoing issue within our patient population, both with old batches from Fall/Winter 2020 and new batches released in June 2021. It has been 9 months since our patient population first identified quality issues with the Nalcrom batches. Thus far, the investigations by Sanofi Canada and Health Canada remain ongoing and there has been no resolution. Our patients have no alternative medications and accessing the compounded sodium cromoglycate is not a sustainable solution, as it is not covered by public and private insurance plans and has been reported as less effective than the marketed Nalcrom (prior to the recent quality issues). There has been no communication from Sanofi Canada or Health Canada since July 2, 2021.