Medicines & Healthcare products Regulatory Agency

MHRA

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OFFICIAL - SENSITIVE COMMERCIAL

[redacted]

[redacted]
LONZA BIOLOGICS PLC
228 BATH ROAD
SLOUGH
SL1 4DX
UNITED KINGDOM

Insert date

Case No: Insp GMP/IMP 18606/11099-0014

Subject: **THE HUMAN MEDICINES REGULATIONS 2012 (as amended) (SI 2012/1916) MANUFACTURER'S LICENCE NO. MIA 18606**
THE MEDICINES FOR HUMAN USE (CLINICAL TRIALS) REGULATIONS 2004 (SI 2004/1031) MANUFACTURER'S LICENCE NO. MIA (IMP) 18606

Dear [redacted]

May I thank you and your colleagues for the courtesy and co-operation shown during the inspection of your premises at the above location on 11 – 13th October 2022.

During the inspection a number of failures to comply with the principles and guidelines of Good Manufacturing Practice and / or Good Distribution Practice were observed and these are listed in the Appendix to this letter.

Please reply within 28 days, giving your proposals for dealing with these matters, together with a timetable for their implementation. Please send your response electronically by e-mail to me at the address below.

It would be appreciated if your response was in the following format:

1. Restate the deficiency number and the deficiency as written below.
2. State the proposed corrective action and the target date for completion of these action(s)
3. Include any comment that the company considers appropriate.
4. Please provide the response as a word document.

Further guidance on responding to inspection deficiencies can be found at the following web link
https://www.gov.uk/guidance/guidance-on-responding-to-a-gmpgdp-post-inspection-letter

Yours sincerely

[redacted]
Senior GMDP Inspector

Email [redacted]

Medicines & Healthcare products Regulatory Agency

MHRA Regulating Medicines and Medical Devices

File Ref: Insp GMP/IMP 18606/11099-0014
Inspection Date: 11-13th October 2022
Company: Lonza

FAILURES TO COMPLY WITH THE GUIDE TO GOOD MANUFACTURING / DISTRIBUTION PRACTICE

1 CRITICAL

None

2 MAJOR

2.1 **Contamination control and the prevention of contamination was deficient in that:**

2.1.1 **Visitor gowning:**

2.1.1.1 There appeared to be no formal gowning requirements for visitors to the production area.

2.1.1.2 There were inconsistent gowning requirements for visitors across the facility

2.1.1.3 Visitors were permitted into the grade B area of the change room leading to bulk fill wearing just a coverall over outdoor clothes

2.1.2 **Operations:**

2.1.2.1 Filling bottles were exposed in the Grade B environment before transfer to Grade A [redacted] without additional protection or sanitization.

2.1.2.2 Non-viable particle counts were not measured in the Grade B area for bulk filling when filling set up was being performed.

2.1.2.3 Sanitization of occluded surfaces within adjustable chairs had not been adequately considered.

2.1.2.4 Some movements were observed within the [redacted] that had the potential to adversely impact airflows, e.g.rapid spinning of filling bottle tops, hand motions and operator moving quickly on a laboratory chair from one side of the [redacted] to the other .

2.1.3 **Raw materials**

2.1.3.1 The contamination control strategy had scored the likelihood of detection of cross contamination between buffer raw materials as high but had not considered that the examples of tests referenced, e.g. pH, conductivity, osmolality may not have been sufficiently sensitive to detect contamination.

Reference: EU GMP Annex 1 - 8, 10, 37, 42, 43, 44, 73, 77

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3 OTHERS

3.1 **Equipment maintenance/qualification was weak in that:**

3.1.1 A temporary fix of a leaky drain in purification suite [redacted] carried out in January 2022 was not followed up with a permanent repair. This resulted in a subsequent leak from the drain in September 2022

3.1.2 No work orders had been raised for the damaged seals on two wave machines [redacted]

3.1.3 Tube welder [redacted] had not been requalified since the original PQ in September 2016.

3.1.4 Temperature mapping of freezers had not considered if only a single drawer was open (e.g. bottom shelf) whether temperature excursions would be detected at the monitoring probe location e.g. at the top shelf.

Reference: EU GMP Chapter 3 - 3.34 Annex 15 – 4.1, 4.2

3.2 **Documentation was weak in that:**

3.2.1 SOP [redacted] did not reference the cross contamination procedure [redacted] describing handling of one cell line at a time in the inoculation suites.

3.2.2 The summary table in the annual utilities report [redacted] did not fully reflect the data presented in the table for action limit excursions.

3.2.3 The pictorial representation of Grade B gowning in SOP [redacted] was inaccurate and required updating.

3.2.4 The OOS procedure [redacted] was ambiguous if timelines for performing investigations were referring to working or calendar days with a Phase 1b investigation for [redacted] discussed that had taken over a week to complete and not within the 3 days required by the procedure.

Reference: EU GMP Chapter 4 – Principle, 4.3, 4.5,

4 COMMENTS

None