Medicines & Healthcare products Regulatory Agency

MHRA
Regulating Medicines and Medical Devices

OFFICIAL - COMMERCIAL

MHRA
151 Buckingham Palace Road
London SW1W 9SZ
United Kingdom

mhra.gov.uk

[redacted]

[redacted]

03 December 2015

Ref: Insp GMP 17901/10117-0031

Subject: **THE HUMAN MEDICINES REGULATIONS 2012 (as amended) (SI 2012/1916)**
ACTIVE SUBSTANCE REGISTRATION NO. 17901

Dear [redacted]

May I thank you and your colleagues for the courtesy and co-operation shown to me during the inspection of your premises at the above location on the 30th November to 2nd December 2015.

During the inspection a number of failures to comply with the principles and guidelines of good manufacturing 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.

Yours sincerely

[redacted]

[redacted]
GMDP Inspector
Telephone: [redacted]
Email: [redacted]

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Company: [redacted]

FAILURES TO COMPLY WITH THE GUIDE TO GOOD MANUFACTURING PRACTICES

1 CRITICAL

None

2 MAJOR

None

3 OTHERS

3.1 The PQR process was observed to be deficient. For example;

3.1.1 The report for 2012 manufacture had never been signed by any person as being approved.

3.1.2 The report for 2013/2014 had not been signed until three days before the inspection commenced, approximately 15 months after the proceduralised limit of 3 months beyond the end of the period under review.

3.1.2.1 As the date of signing the 2013/2014 PQR was beyond the date of commencing the campaign that in progress at the time of the inspection, it was not possible to verify that a review of any necessary actions required to be implemented had occurred.

3.1.3 The 2012 and 2013/2014 PQRs erroneously identified that equipment qualification was not required for API manufactures.

Reference: EU GMP Part II 2.60, 6.10, 12.30

3.2 The change control process did not consider all implicated areas, for example;

3.2.1 There was no consideration from a regulatory perspective of whether the reprocess of batch [redacted] would be acceptable.

3.2.2 There was no consideration of placing the batch of [redacted] API manufactured using a reprocessed [redacted] batch on stability.

Reference: EU GMP Part II 13.13, 13.16

3.3 The following issues were noted with [redacted] batch records;

3.3.1 The Proven Acceptable Ranges (RAR) report for the [redacted] process did not concur with the batch record which identified step [redacted] as critical, however the step was identified as non-critical in the PAR.

3.3.2 The visual inspection for level 0 clean in DPF1 for [redacted] API had been carried out by the required trained personnel, however the batch record did not specifically state that this had to be carried out by the trained personnel as required.

Reference: EU GMP Part II 3,12, 6.52, 12.11

3.4 There was no periodic assessment of the effectiveness of GMP training.

Reference: EU GMP Part II 3.12

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4 COMMENTS

4.1 The site were asked to review the strategy detailing the interface between the commercial and development facilities and to ensure that these remain accurate and are clearly understood by all involved in the process.

4.2 [redacted]