Medicines & Healthcare products Regulatory Agency

MHRA

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OFFICIAL – SENSITIVE COMMERCIAL

[redacted]

[redacted]
DSM NUTRITIONAL PRODUCTS (UK) LIMITED
DRAKEMYRE
DALRY
KA24 5JJ
UNITED KINGDOM

20 November 2023

Case No: Insp GMP 19108/29211-0007

Subject: THE HUMAN MEDICINES REGULATIONS 2012 (as amended) (SI 2012/1916)
ACTIVE SUBSTANCE REGISTRATION NO. UK API 19108

Dear [redacted]

Thank you for the courtesy and co-operation shown during the inspection of your premises at Dalry on 15th and 16th November 2023.

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 the inspectors at [redacted] and [redacted]

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]
GMDP Inspector
Email: [redacted]

Medicines & Healthcare products Regulatory Agency

MHRA
Regulating Medicines and Medical Devices

File Ref: Insp GMP 19108/29211-0007
Inspection Date: 15th and 16th November 2023
Company: DSM Nutritional Products (UK) Limited

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

1 CRITICAL

None

2 MAJOR

None

3 OTHERS

3.1 **The effectiveness of the quality system was not optimised, in that:**

3.1.1 Actions arising from the quarterly management review meetings were not formally captured within the quality system.

Reference: EU GMP Part II: 2.11

3.2 **Control of starting materials was deficient, in that:**

3.2.1 TSE statements were only requested every five years for non-critical materials. It is noted that this had been reduced to 3 years as a commitment to the previous inspection findings, but it had subsequently been increased back to 5 years.

Note for guidance on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products (EMA/410/01 rev.3)

3.3 **Sampling operations were not adequately defined or controlled, as evidenced by:**

3.3.1 The sampling manual [redacted] v [redacted] described the use of single use disposable tools. However it was evident that some materials were actually sampled using dedicated reusable tools.

3.3.2 The sampling records for a recent delivery of [redacted] were not in accordance with the described sampling regime. According to the procedure, 5 of the 16 bags should have been sampled but in reality, 6 had been sampled. There was no explanation for this deviation.

3.3.3 The completion of the sampling room register was inconsistent. Some pressure readings were captured numerically whereas others were recorded as a 'tick'.

Reference: EU GMP Part II: 7.10, 7.33

3.4 **Verification of equipment performance was deficient, in that:**

3.4.1 The X-ray procedure [redacted] v [redacted] required the instrument to be challenged every day with each of the 3 test pieces separately. However, it was evident that all 3 test pieces were actually put through the machine together.

Reference: EU GMP Part II: 5.30

3.5 **There was a failure to adequately revise and maintain procedures, as evidenced by:**

3.5.1 DMRC contact details within the recall SOP referenced an obsolete email address.

Reference: EU GMP Part II: 6.10, 6.11

3.6 **There was a failure to adequately verify the consistency of processes through Product Quality Reviews, as evidenced by:**

3.6.1 PQR [redacted] 01 Sep 2021 to 31 Aug 2022, [redacted] (29-Nov-2022), stated that the 2016 stability was still ongoing even though this was completed during the review period.

3.6.2 PQR [redacted] May 2022 to Apr 2023 [redacted] (31-Jul-2023), stated that 115 batches had been produced during the review period, but actually 135 batches had been produced. Inconsistent numbers of batches were also reported in the various associated release testing trending graphs within the PQR which was not picked up during review and approval cycle.

3.6.3 All three PQRs [redacted] during the inspection stated that compliance checks had been completed according to [redacted]. This Management Directive was retired in October 2018.

Reference: EU GMP Part II: 2.60

4 COMMENTS

None