GMP Trends

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NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

To: Responsible Person, Director of Quality Assurance

FIRM NAME	STREET ADDRESS
Pharmaceutical and Related Industries	5600 Regulation Lane
CITY, STATE AND COUNTRY	TYPE OF ESTABLISHMENT INSPECTED
United States of America and Worldwide	Pharmaceutical and Medical Device

DURING A REVIEW OF INSPECTION REPORTS OF U.S. FIRMS (I) (WE) OBSERVED:

EDITED EXCERPTS FROM ACTUAL 483 OBSERVATION REPORTS BY FOOD AND DRUG ADMINISTRATION INVESTIGATORS

MANUFACTURING CONTROLS

1. .....Production and process control procedures are not followed in the execution of production/process control functions.

   Specifically, it was found that access to the electronic database, where electronic SOPs are maintained, is not available to all manufacturing and cleaning employees. Since hard copies of approved SOPS are not maintained in the manufacturing floor, employees without access have to request a paper copy of the SOP from a supervisor or another employee who may have access, if they need it to perform their duties. Out of approximately ..... employees in the manufacturing area, only ..... employees were reported as having access to the electronic SOPs. The quality and manufacturing unit lacked adequate justification to limit access to SOPs to supervisors and randomly selected employees.

2. .....The responsibilities and procedures applicable to the quality control unit are not in writing and fully followed.

   Specifically, SOP ....., Vendor Audits, and SOP ....., Deviations and Quality Investigations, state that the firm has the responsibility of ensuring that outside consultants used to conduct firm business are compliant with regulations and agreements. However, both SOP's have not been followed when addressing deviations found during an audit of their pharmacovigilance vendor. An investigation was not opened to ensure that corrections were made and preventive actions put in place, as needed. During the current inspection, the same type of QC review error was observed.

3. .....Equipment and utensils are not cleaned and maintained at appropriate intervals to prevent contamination that would alter the safety, identity, strength, quality or purity of the drug product.

   Specifically,

   a. Preventive maintenance procedures and cleaning procedures for the ..... fluid bed dryers do not include evaluation of the air inlet duct work or the gaskets in the air inlet areas. The air inlet duct work had not been inspected for any of the fluid bed dryers.

   b. The air inlet ducts for the "cleaned," non-dedicated fluid bed dryers were inspected and found to contain unidentified foreign material.

   - **Unidentified powder residues and particles were observed in the air intake ducts.**
   - **The inner surfaces of the air inlet ducts appeared corroded.**
   - **The black gasket at the air filter had missing pieces. Black particles were observed in the air ducts below the filter.**
   - **The gasket on the air inlet duct nearest to the fluid bed dryer was discolored.**

4. .....Production processes were not developed, conducted, and controlled.

   Specifically, the firm's manufacturing process and its quality control testing has not been adequately developed and appears to lack adequate quality control mechanisms as evidenced by what appears to be systemic quality issues. For example, the firm has opened several CAPA for purity failures. Root cause analysis identified the following: equipment failure; clogged filter; failing to characterize the HPLC method for injection volume; failure to optimize the pH requirements and heat settings during drying. Despite opening five CAPAs, a root cause analysis that comprehensively assesses all manufacturing processes and quality control testing methods to identify and address all potential causes of product purity failures has not been conducted.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE	DATE ISSUED
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