DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

Use this check box to generate the required 483 statement on page 1 for medical device observations. ☐

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
10903 New Hampshire Avenue Bldg 51 Room 4234 Silver Spring, MD 20993 Phone 301-796-3206 ORAPHARMInternational483Responses@fda.hhs.gov Industry Information: www.fda.gov/oc/industry	10/21/2019 to 10/25/2019
	FEI NUMBER 3004086884

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Mallikarjuna Reddy Kurre, General Manager Operations

FIRM NAME	STREET ADDRESS
Aurobindo Pharma Limited Unit VIII	Survey No. 10 & 13, Gaddapotharam Village IDA Kazipally
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Jinnaram Mandal, Sangareddy District, Telangana, 502319 India	API Manufacturer

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DURING AN INSPECTION OF YOUR FIRM (I) (WE) OBSERVED:

OBSERVATION 1

Written procedures are not established to assure that equipment is clean prior to use, where full verification of cleaning is not conducted between production batches. Specifically, the cleaning validation CV/A/OL-001-02, dated 4/02/14 for (b) (4) API is not adequate in that:

a) the cleaning procedures currently in use, Equipment Cleaning Record (ECR) for the (b) (4) , effective 7/04/14, were not evaluated in the cleaning validation for the (b) (4) (Equipment ID (b) (4) 001). Additionally, this ECR has no document control number.

b) the cleaning validation report CV/A/OL-001-02, dated 4/02/14, does not include an evaluation for the cleaning of the (b) (4) (Equipment ID (b) (4) 013).

c) the cleaning validation report CV/A/OL-001-02, dated 4/02/14, does not include all supporting documentation, such as the Equipment Cleaning and Use Log and the logbook was reportedly not maintained, therefore the details pertaining to the actual cleaning of the equipment could not be verified.

OBSERVATION 2

Investigations into critical deviations are not always thorough including appropriate follow up, and/or fully documented. Specifically, investigations pertaining to out-of-specification (OOS) residual solvents and/or water content results in (b) (4) API, which were performed for several batches of (b) (4) API manufactured from 5/07/17 to 10/08/18 were not thorough. For example,

a) Investigation into OOS-U08-000734, OOS-U08-000735, OOT-U08-000151, OOT-U08-000154, initiated on 12/06/17, reporting OOS for Residual Solvents (b) (4) concluded that a malfunction pertaining to the (b) (4) circulation in (b) (4) however; there is no scientific data to support this conclusion and all potential root causes were not investigated and/or discussed. Additionally, the investigation did not include a review of the equipment qualification for (b) (4) (b) (4) 002), which was performed by the previous site owner in 2003, for which there has been no review by the firm's Quality Unit for its acceptability. Additionally, the firm does not maintain electronic batch processing data for equipment

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
	Gayle S Lawson Kenneth H. Williams	Gayle S. Lawson, Pre-Approval Manager Division 1 Branch 2 Investigator Kenneth H. Williams, Chemist	10/25/2019

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such as (b) (4) 002, therefore an adequate review of the (b) (4) process and functioning of the (b) (4) could not be performed. Ten batches of (b) (4) API manufactured from 5/07/17 to 10/08/18 were OOS for Residual Solvents or Water Content.

b) Investigation into OOS-U08-000860 & OOS-U08-000861initiated 9/14/18 reporting OOS for Residual Solvents (b) (4) concluded that a malfunction pertaining to leakage in the (b) (4) line; however all potential root causes were not investigated and/or discussed.

c) Deviation Record Number DE-U08-000455 initiated 12/19/17 reporting an OOS for water content for (b) (4) Reprocessed Batch (b) (4) (reprocessed batch of (b) (4) API, input batch (b) (4), concluded that condensation in the packing material during storage of the input batch caused the failure; however all potential root causes were not investigated and/or discussed.

OBSERVATION 3

The responsibilities and procedures applicable to the Quality Unit are not established or fully followed. Specifically, procedures are not established to determine when a reprocessed batch will be put on stability to ensure the batch meets its quality attributes throughout the retest or expiry period, when no changes will be made to the process. For example, (b) (4) API-Reprocessed, including (b) (4) Batch (b) (4) (12/15/17), which was distributed as (b) (4) Batch (b) (4) was not put on stability, and there is no documented rationale for its exclusion.

OBSERVATION 4

Batch production and control records do not always include complete information and data relating to the production and control of each batch. For example, electronic batch processing data for equipment such as (b) (4) 002, used in the manufacture of (b) (4) API, including (b) (4) API Batch (b) (4) is not maintained.

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