DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
466 Fernandez Juncos Avenue San Juan, PR 00901-3223 (787)729-8500 Fax:(787)729-6809 ORAPHARM2_RESPONSES@fda.hhs.gov	2/7/2022-2/17/2022* FEI NUMBER 2623619

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Jose Campos, General Manager

FIRM NAME	STREET ADDRESS
Pfizer Pharmaceuticals LLC	Road 689, Km 1.9
CITY, STATE, ZIP CODE, COUNTRY Vega Baja, PR 00693	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer

This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

DURING AN INSPECTION OF YOUR FIRM WE OBSERVED:
Quality System

OBSERVATION 1

Testing and release of drug product for distribution do not include appropriate laboratory determination of satisfactory conformance to the final specifications prior to release.

Specifically,

Your Quality Unit failed to ensure that potential genotoxic and suspected human carcinogenic N- Nitrosamine impurity is not present or below the established Acceptable Intake (AI) limits in the Atorvastatin API used for the manufacturing of Lipitor and/or Atorvastatin Calcium Tablets. As per Document ID # (b) (4) titled "N-Nitrosamine assessment: Atorvastatin API (b) (4)) manufactured at Pfizer Little Island" dated & signed on 26 APR 2021, discloses that the main starting material, (b) (4) is identified as a potential source of N-Nitrosamine, specifically, the Nitrosodiethanolamine (NDELA) impurity. In addition, the document concluded that no further action is required for the Atorvastatin API (b) (4) because periodical analytical testing of the raw material is performed by the supplier and found below control limits. Pfizer Little Island, Ireland seems to pass the responsibility to control the NDELA to the Chemical Company supplier. However, as per the supplier of the (b) (4) under document titled "Declaration of the Nitrosamine Content" dated on 12 DEC 2019, it disclosed that the nitrosamine determination is not generally part of the testing plan for the raw material of (b) (4) , but that monitoring of NDELA impurity is performed at regular interval (found to be (b) (4) since 2011). This represents approximately (b) (4) (i.e., (b) (4)) of

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Marian E Ramirez, Investigator Miguel A Martinez, Chemist/Biologist	X Marian E Ramirez Investigator Signed By: Marian E. Ramirez -S Date Signed: 02-17-2022 18:2 :33	2/17/2022

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(b) (4) staring material, tested for NDELA impurity used for the manufacturing of Atorvastatin API (i.e., total of about (b) (4) batches) that was consequently used in the manufacturing of the finished product of Lipitor / Atorvastatin Calcium (i.e., total of about (b) (4) batches, out of which (b) (4) are for US market) for the period of FY2020 to FY2021. Furthermore, the document declares that "Information provided may support but does not substitute the risk assessment and control strategy for nitrosamine impurities in the customer's finished product". Therefore, the API and consequently the drug finished product manufactured, provides a risk of the presence of NDELA impurity and no confirmatory testing to all batches, required when there is a risk for the presence of nitrosamine impurities.

This discrepancy applies to the following finished drug products dosages strength and examples but not limited to:

- Lipitor (atorvastatin calcium) 10 mg Tablets, Batch # ER9767 (Manufacturing Date: 12/3/2020), Atorvastatin CA API, Batch # DR0643
- Lipitor (atorvastatin calcium) 20 mg Tablets, Batch # DW9442 (Manufacturing Date: 3/25/2020), Atorvastatin CA API, Batch # CW8252
- Lipitor (atorvastatin calcium) 40 mg Tablets, Batch # FR3366 (Manufacturing Date: 11/3/2021), Atorvastatin CA API, Batch # FC7989
- Lipitor (atorvastatin calcium) 80 mg Tablets Batch # EW3592 (Manufacturing Date: 8/26/2020), Atorvastatin CA API, Batches # DH6621 & # DH6620
- Atorvastatin Calcium Tablets, 10 mg, Batch # ED6448 (Manufacturing Date: 6/30/2020), Atorvastatin CA API, Batch # DF6938
- Atorvastatin Calcium Tablets, 20 mg, Batch # DX6974 (Manufacturing Date: 3/16/2020), Atorvastatin CA API, Batch # CJ2784
- Atorvastatin Calcium Tablets, 40 mg, Batch # EK1317 (Manufacturing Date: 9/23/2020), Atorvastatin CA

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API, Batch # DJ8261

- Atorvastatin Calcium Tablets, 80 mg, Batch # DK8570 (Manufacturing Date: 2/3/2020), Atorvastatin CA API, Batch # CN1547 & #CN1548

*DATES OF INSPECTION

2/07/2022(Mon), 2/08/2022(Tue), 2/09/2022(Wed), 2/10/2022(Thu), 2/14/2022(Mon), 2/15/2022(Tue), 2/16/2022(Wed), 2/17/2022(Thu)

X Miguel A Martinez
Chemist/Biologist
Signed By: Miguel A. Martinez -S
Date Signed: 02-17-2022 18:25:10

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	Marian E Ramirez, Investigator Miguel A Martinez, Chemist/Biologist	X Marian E Ramirez Investigator Signed By: Marian E. Ramirez -S Date Signed: 02-17-2022 18:2 :33	2/17/2022

The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or
2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgment, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."