

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER US Customhouse Rm900 2nd & Chestnut St Philadelphia, PA 19106 (215)597-4390 Ext:4200 Fax:(215)597-0875	DATE(S) OF INSPECTION 11/27/2017-12/7/2017*
	FEI NUMBER 3000214934

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
 Scott E. Birk, Director of Quality

FIRM NAME Almac Pharma Services LLC	STREET ADDRESS 2661 Audubon Rd
CITY, STATE, ZIP CODE, COUNTRY Audubon, PA 19403-2413	TYPE ESTABLISHMENT INSPECTED Drug Repacker/Relabeler

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:
OBSERVATION 1

Written records of investigations into unexplained discrepancies do not always include the conclusions and follow-up.

Specifically, Complaint Investigation (b) (4), reporting that Fentanyl 200mcg Tablets were commingled in the blister-packaged batch of Fentanyl 400 mcg Lot W001587, was not thorough in that it:

- A. Did not extend to other products/batches as necessary. For example, the investigation did not include a discussion of Myorisan Capsules batches which are similarly blister packaged on the same packaging line, for which incomplete batch changeovers and line clearance conditions identified in Complaint Investigation (b) (4) may have existed.
- B. Did not include an examination by the packager of the packaged batches to determine the prevalence of the defect.

OBSERVATION 2

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

Specifically,

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	Christina K Theodorou Investigator Signed By: Christina K. Theodorou S Date Signed: 12-07-2017 13:43:54 X	

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A. Deviations were not initiated per SOP/DIV/GEN010/05: Deviation/CAPA Management for:

1. The failure to follow instructions for the Line Clearance, which excluded the (b) (4) procedure, during the packaging of, Fentanyl 100mcg Lot W001585, Fentanyl 200mcg Lot W001586, Fentanyl 400mcg Lot W001587 and Fentanyl 600mcg Lot W001588, which was identified as a contributing factor in the commingling of Fentanyl 200mcg Tablets in the blister-packaged batch of Fentanyl 400 mcg Lot W001587.
2. The failure to adequately inspect the (b) (4) feeder apparatus during the line clearance of Fentanyl 200mcg Lot W001586, which requires the disassembly of the feeder to visualize all spaces where dosage units may be present following the processing of the batch, which was identified as a contributing factor in the commingling of Fentanyl 200mcg Tablets in the blister-packaged batch of Fentanyl 400mcg Lot W001587.
3. The issuance of a master batch record that did not have adequate instructions for the AQL modifications for the stability batch of Buprenorphine and Naloxone Lot W001273, which was determined to be a contributing factor in the investigation of Deviation Report DFR (b) (4)

B. Procedures for the quality assurance review of batch production records do not include the review of all data. For example, data generated by the (b) (4) system is not reviewed by the quality assurance unit to approve or reject the batch. The (b) (4) (b) (4) system is used to reject blister-cards containing dosage units that do not match the color and size electronically distinguished by pixels. In addition, the units rejected per the (b) (4) system are not assessed by QA. The (b) (4) system is used on the (b) (4) Blister Machine (b) (4) to pack drug product such as Myorisan Capsules.

OBSERVATION 3

Employees engaged in the manufacture, processing and packing of a drug product lack the education, training and experience required to perform their assigned functions.

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Specifically, the firm's system administrator for the (b) (4) HPLC System does not have sufficient knowledge to perform the duties of the System Administrator such as: to monitor the system for review of audit trails, to ensure that unauthorized users do not access the system, and to ensure the integrity of data. The System Administrator's use of the system is limited to resetting passwords for the QC analysts, create and delete user accounts.

OBSERVATION 4

Written procedures for cleaning and maintenance fail to include description in sufficient detail of methods, equipment and materials used and description in sufficient detail of the methods of disassembling and reassembling equipment as necessary to assure proper cleaning and maintenance.

Specifically,

A. There is no data to demonstrate the effectiveness of the cleaning performed following processing of Fentanyl Citrate Tablets on the (b) (4) blister packaging line. This blister-packaging line is used for the primary packaging of drug products, such as Myorisan Capsules and Fentanyl Citrate Buccal Tablets (ANDA 203357).

For example:

1. There is no verification testing performed for the stationary packaging equipment ((b) (4) Blister Machine (b) (4)) and Room (b) (4) where no cleaning validation studies have been conducted.
2. There is no data to demonstrate that the (b) (4) swab sample size is appropriate.
3. There is no procedure to define that the swab location is the worst-case or "hot spot" location of the equipment. No records are maintained as to where the swab samples were taken.

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- B. There is no scientific rationale for the sampling plan established in the (b) (4) study, Verification of a (b) (4) on Production Equipment (b) (4). For example, the study was limited to cleaning performed on sieves dusted with API and held in a (b) (4) (b) (4), which is not representative of the worst-case or "hot spots" on the (b) (4) blister line.

OBSERVATION 5

Laboratory records do not include complete data derived from all tests, examinations and assay necessary to assure compliance with established specifications and standards.

Specifically,

- A. Analytical packets do not always include identification of samples, sample preparation, and a record to associate the laboratory record to the HPLC analytical run. For example, Cleandown Verification Summary for Isotretinoin, (b) (4) does not identify the samples that were taken, and sample preparation. The HPLC sequence was identified as "(b) (4) (b) (4)". The HPLC system is used for cleaning verification swab sample analysis.
- B. Equipment maintenance and usage logs are not maintained for all laboratory instruments. For example, there is no equipment maintenance and usage log for the (b) (4) (b) (4) HPLC.

***DATES OF INSPECTION**

11/27/2017(Mon), 11/28/2017(Tue), 11/29/2017(Wed), 11/30/2017(Thu), 12/01/2017(Fri), 12/04/2017(Mon), 12/05/2017(Tue), 12/07/2017(Thu)

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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."