

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

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| DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857 | DATE(S) OF INSPECTION 6/10/2024-6/19/2024* |
| | FEI NUMBER 3010254278 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Sandeep R. Raktate, President - India Operations

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| FIRM NAME Amneal Pharmaceuticals Private Ltd., Parenteral Unit | STREET ADDRESS Plot No. 15 Pharmez Special Economic Zone, Sarkhej - Bavla N.H. No. 8a |
| CITY, STATE, ZIP CODE, COUNTRY Ahmedabad, Gujarat, 382213 India | TYPE ESTABLISHMENT INSPECTED 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:

OBSERVATION 1

Your firm failed to establish adequate written procedures for production and process controls designed to assure that the drug products have the identity, strength, purity, and quality that they are purported or represented to possess.

Specifically,

A) Your firm has not completed Air flow visualization studies under dynamic conditions after the addition of new (b)(4) Unidirectional Flow (UAF) HEPA filter installation around the vial filling RABS (SM-191) intended to be used for the filling of (b)(4) injection (b)(4). According to Mr. N.G, GM, Operations, as of 6/19/2024, there are about (b)(4) air flow visualizations for various activities performed at the Grade A area are yet to be completed.

B) Your firm has not completed Aseptic Process Simulations (Media fills) after the addition of new (b)(4) Unidirectional Flow (UAF) HEPA filter installation around the vial filling RABS (SM-191) intended to be used for the filling of (b)(4) injection (b)(4).

C) Performance Qualification (Protocol # PQ-SM-498-00) performed for the (b)(4) (SM-498) is inadequate, as only (b)(4) and (b)(4) processes were qualified and no functional performance of the (b)(4) was evaluated in this study. In addition, a Performance Qualification study for the (b)(4) Unit (SM-530) which controls the (b)(4) of (b)(4) during (b)(4) processes, has not been performed.

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OBSERVATION 2

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile did not include adequate validation of the aseptic process.

Specifically,

A) Your firm uses disinfectants to disinfect your facility and equipment, including surfaces that come into contact with the sterile drug products manufactured by your firm. Review of your disinfectant efficacy study (Protocol # AP-QCM-MIS-43-02) showed that the study was performed by spraying the disinfectant over the (b)(4). This method of disinfecting is different than your routine disinfecting procedure (AP-SMC-003-001) wherein the disinfectant is spread using a (b)(4) or wiped using a (b)(4) wipe.

B) Goggle fitted hoods, donned by operators for aseptic operations within Grade A zones and aseptic production support operations within Grade B zones, are not suitably designed to prevent shedding of particulates and other contaminants to the environment under working conditions. Operators were observed working within the Grade A classified areas during aseptic filling operations interventions while wearing the goggle fitted hoods that have direct vent openings, including 10 holes on the top measuring approximately (2) 11 mm, (2) 9 mm, (2) 13 mm, (2) 10 mm and (2) 8 mm.

OBSERVATION 3

Control procedures are not established which validate the performance of those manufacturing processes that may be responsible for causing variability in the characteristics of in-process material and the drug product.

Specifically,

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A) Process validation study (Protocol # AP-I-P1GF-PV-1351(1)-78-01 (Bulk)) performed for the manufacturing of the common bulk for (b)(4) injection (b)(4) mg/vial, (b)(4) mg/vial, (b)(4) mg/vial and (b)(4) mg/vial, is inadequate, as (b)(4) a critical process parameter, is measured at the (b)(4) during the (b)(4) processes. However, no specification limit for the (b)(4) is included in the process validation protocol.

B) Process validation study conducted by your firm for (b)(4) injection (b)(4) mg/vial (protocol # AP-I-P1GF-PV-1350(1)-41-01 (Filling)) is inadequate, as the preapproved protocol required the (b)(4) set value of (b)(4) however, the process validation batches, (b)(4) and (b)(4), were manufactured using the (b)(4) of (b)(4) respectively, and there is no written justification included in the study report for manufacturing these batches at the aforementioned significantly different (b)(4)

C) Process validation studies conducted for (b)(4) injection (b)(4) mg/vial (protocol # AP-I-P1GF-PV-1350(1)-41-01 (Filling)), (b)(4) mg/vial (protocol # AP-I-P1GF-PV-1351(1)-78-01 (Filling)), (b)(4) mg/vial (protocol # AP-I-P1GF-PV-1352(1)-116-01 (Filling)) and (b)(4) mg/vial (protocol # AP-I-P1GF-PV-1353(1)-152-01 (Filling)) are inadequate, as no yield specification limits were defined for the process validation batches. In addition, no deviation investigation was performed by your firm when a yield of (b)(4)% was obtained for batch # (b)(4) compared to (b)(4)% and (b)(4)% for the batches (b)(4) and (b)(4)

OBSERVATION 4

Routine calibration of electronic equipment is not performed according to a written program designed to assure proper performance.

Specifically,

Fill weight of the (b)(4) injection (b)(4) vials during the filling process are

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measured using a (b)(4). However, no weight verification of the (b)(4) is performed after the filling of a batch to assure that the (b)(4) was accurate throughout the manufacturing operation. For example, a filling campaign that included filling of batch #s (b)(4) to (b)(4) was filled over (b)(4) and no weight verification of the (b)(4) was performed after the filling campaign. In addition, periodic calibration performed by your firm for the (b)(4) is inadequate, as only internal calibration is performed using a single weight, and no repeatability and accuracy were performed.

***DATES OF INSPECTION**
6/10/2024(Mon), 6/11/2024(Tue), 6/12/2024(Wed), 6/13/2024(Thu), 6/14/2024(Fri), 6/17/2024(Mon), 6/18/2024(Tue), 6/19/2024(Wed)

X Jigar R Patel
FDA Center Employee
Signed By: 2002843671
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