DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Food and Drug Administration

91153d

19900 MacArthur Blvd., Ste 300
Irvine, California 92612-2445
Telephone (949) 798-7600

WARNING LETTER

April 19, 2001

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Harold C. Kechter, President
Truett Laboratories, Inc.
798 North Coney Avenue
Azusa, CA 91702

W/L 41-01

Dear Mr. Kechter:

During an inspection of your manufacturing facility located in Azusa, CA, conducted March 7 through March 16, 2001, our investigators documented deviations from the Current Good Manufacturing Practices (cGMPs) for Finished Pharmaceuticals (Title 21, Code of Federal Regulations, (CFR) §§ 210 and 211). Those deviations cause all drug products manufactured at your facility to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug and Cosmetic Act (the Act). The violations from 21 CFR §211 include:

1. Failure to reject drug products that fail to meet established standards or specifications [21 CFR §211.165(f)] and failure to perform documented investigations into unexplained discrepancies, including an evaluation of all lots affected by the discrepancy, the conclusions and follow up [21 CFR §211.192]. For example, finished product that originally failed specifications was re-tested several times, again with failing results, and released without a documented investigation into the failing results or justification for the product's release.

2. Failure to reject any lot of components that does not meet appropriate specifications of identity, strength, quality and purity [§211.84(e)]. For example, products were manufactured and released using water that failed microbiological specifications.

3. Failure to establish production and process control procedures designed to assure your drug products have the required identity, strength, quality and purity [21 CFR §211.100(a)]. For example, you have no process validation for any of your prescription or OTC drug products.

4. Failure to ensure that equipment used in the manufacture, processing, packaging or holding of a drug product is of appropriate design, adequate size and is suitably

located [21 CFR §211.63]. Examples of non-qualified process equipment include your purified water system, blenders, tableting presses, mixers and filling machines.

5. Failure to maintain equipment to prevent malfunctions or contamination that would alter the safety, identity, strength and purity of the drug product [21 CFR §211.67(a)]. For example, you change chart recorders designed to record weekly data on a monthly schedule.

6. Failure to establish and follow appropriate written procedures designed to prevent malfunctions or contamination that would alter the safety, identity, strength and purity of the drug product [21 CFR §211.67(b)]. For example, you have no validation that your cleaning and sanitation procedures prevent significant cross contamination of drug products that could arise from multi-use manufacturing process equipment.

7. Failure to evaluate the quality standards of each drug product annually [21 CFR §211.180(e)]. You have not conducted this review for any of your products for at least the past two years. Our investigators documented the use of outdated USP methods, some from as early as 1985 (USP XXI), at your facility.

8. Failure to perform an appropriate laboratory determination of satisfactory conformance to final specifications for each batch of drug product [21 CFR §211.165(a)]. For example, content uniformity testing is not conducted on each batch of tablets manufactured.

9. Failure to establish scientifically sound and appropriate specifications, standards, sampling plans and test procedures [21 CFR §211.160(b)]. For example, there is no documented sampling plan for incoming components, in process or finished product sampling.

10. Failure to withhold from use each lot of a component until the lot has been sampled, tested or examined as appropriate 21 CFR §211.84(a)]. For example, growth promotion tests are not performed on incoming lots of media nor during the performance of the test.

11. Failure to follow a testing program designed to assess the stability characteristics of drug products [§211.166(a)]. For example, you are not conducting stability tests at the intervals required in your written stability test procedure.

12. Failure to maintain complete records of all testing and standardization of laboratory reference standards, reagents and solutions [21 CFR §211.194(c)]. For example, there are no records documenting the preparation and standardization of reference standards used in component, in process and finished product testing.

13. Failure to ensure that all people engaged in the manufacture, processing, packing or holding of a drug product have the education, training and/or experience to perform their assigned functions [211.25(a)]. For example, you were unable to provide any

training or qualification records for a technician in your quality control laboratory who conducts sampling and testing of raw materials and water sampling, among other things. This technician is currently enrolled in an undergraduate chemistry program.

The above identification of violations is not intended to be an all-inclusive list of deficiencies at your facility. A List of Observations (Form FDA-483) was issued and discussed with you at the conclusion of the inspection. It is your responsibility to assure adherence with each requirement of the Good Manufacturing Practice Regulations. Federal agencies are advised of the issuance of all Warning Letters about drugs so that they may take this information into account when considering the award of contracts. We are recommending withholding any product approvals associated with your testing laboratory. Additionally, pending Antibiotic Form 6 or export approval requests of firms contracting your services may not be approved until the above violations are corrected.

Many of the inspectional observations listed on the current FDA-483 are similar to those for which your firm has been cited as a result of the previous cGMP inspection. You should be aware that we consider several of these observations to be highly significant. You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice, including seizure and/or injunction.

You should notify this office in writing within fifteen (15) working days of receipt of this letter of the specific steps you have taken to correct the noted violations, including an explanation of each step being taken to prevent the recurrence of similar violations. If corrective action cannot be completed within fifteen (15) working days, state the reason for the delay and the time within which corrections will be completed.

Your written response should be directed to the Food and Drug Administration, Attention:

Thomas L. Sawyer
Director, Compliance Branch
Food and Drug Administration
19900 MacArthur Blvd., Suite 300
Irvine, CA 92612

Sincerely,

Alonza E. Cruse
District Director

cc: California Department of Health Services, Food & Drug Branch
601 N. 7th Street
Sacramento, California 94234-7320
Attn: Stuart Richardson, Jr., Chief