



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

(purged)

M210613

OCT 2 1998

Food and Drug Administration
2098 Gaither Road
Rockville MD 20850

WARNING LETTER

VIA FEDERAL EXPRESS

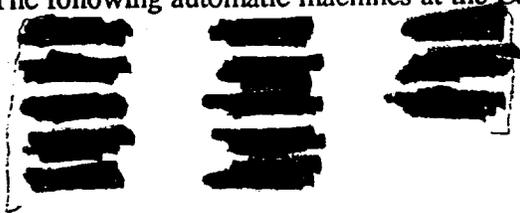
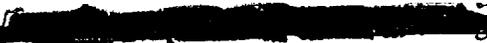
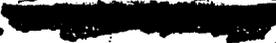
Dr. Luigi Ravizza, CEO and Quality Director
Haemotronic S.p.a
Via Morandi; 12
41037 Mirandola, Italy

Dear Dr. Ravizza:

During the Food and Drug Administration's (FDA) inspection of your firm's facilities, located in Mirandola and Carbonara, Italy from June 29 to July 9, 1998, our investigator determined that your firm manufactures bloodlines. Bloodlines are devices within the meaning of Section 201(h) of the Federal Food, Drug, and Cosmetic Act (the Act).

The above-stated inspection revealed that these devices are adulterated, in that the methods used in, or the facilities or controls used for the manufacture, packaging, storage, or installation are not in conformance with the Quality System Regulations, as specified in Title 21, Code of Federal Regulation (21 CFR), Part 820, as follows:

1. Failure to maintain a record, when no investigation is made of a complaint, that includes the reason no investigation was made and the name of the individual responsible for the decision not to investigate, as required by 21 CFR 820.198(b). For example, there was no record of complaint investigation and failure analysis for the following complaints:
 - a) File # [REDACTED], dated April 7, 1998, which reports that during three (3) different patient treatments, the venous drip chamber developed a leak causing the patients to lose approximately 200cc of blood.
 - b) File # [REDACTED], dated April 17, 1998, which reports a sudden blood leak from a venous chamber.
 - c) File # [REDACTED], dated April 29, 1998, which reports a venous chamber separated during treatment.
 - d) File # [REDACTED], dated June 10, 1998, which reports a crack occurred around the top of the venous line drip chamber causing blood to leak out.

2. Failure to validate a process with a high degree of assurance where the results of the process cannot be fully verified by subsequent inspection and test, as required by 21 CFR 820.75(a). For example:
 - a) The following automatic machines at the Carbonra plant were not validated.

 - b) The  machine (ID ) validation data does not include all the acceptance criteria.
3. Failure to ensure that all equipment used in the manufacturing process meets specified requirements and is appropriately designed, constructed, placed, and installed to facilitate maintenance, adjustment, cleaning and use as required by 21 CFR 820.70(g). For example, a formal equipment installation qualification was not performed for the  units.
4. Failure to establish and maintain procedures to adequately control environmental conditions as required by 21 CFR 820.70(c). For example, there is no formal validation and maintenance procedure for the door alarm which is used to monitor the airflow to the clean room assembling floor at the Cabonara plant.
5. Failure to implement requirements for the cleanliness of personnel where contact between personnel and product could be expected to have an adverse effect on product quality as required by 820.70(d). For example,  faucets that are used for routine wash for employees before entering the clean room were not working. This was observed at the  building. Your procedure , Section  requires that anyone in a controlled area must wash their hands before entering.

We acknowledge receipt of your letter, dated July 24, 1998, which is in reply to the FDA 483 observations noted during the June 29-July 9, 1998, inspection.

This letter is not intended to be an all-inclusive list of deficiencies at your facility. It is your responsibility to ensure adherence to each requirement of the Act and regulations. The specific violations noted in this letter and in the FDA 483 issued at the close of the inspection may be symptomatic of serious underlying problems in your firm's manufacturing and quality assurance systems. You are responsible for investigating and determining the causes of the violations identified by the FDA. If the causes are determined to be systems problems, you must promptly initiate permanent corrective actions. Federal agencies are advised of the issuance of all Warning Letters about devices so that they may take this information into account when considering the award of contracts.

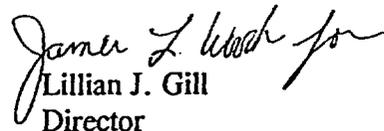
Page 3 - Dr. Luigi Ravizza, CEO and Quality Director

You should take prompt action to correct these and any other manufacturing or quality systems deviations identified by your internal audits. Failure to promptly correct these deviations may be identified in a follow-up inspection, and may result in the detention of your device(s) without physical examination upon entry into the United States.

Please notify this office, in writing, within 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 identify and make corrections to any underlying systems problems necessary to assure that similar violations will not recur. Please include any and all documentation to show that adequate correction has been achieved. In the case of future corrections, an estimated date of completion, and documentation showing plans for correction, should be included with your response to this letter. If the documentation is not in English, please provide a translation to facilitate our review. Please address your response and any questions to Sharon Murrain-Ellerbe, Acting Chief, OB/GYN, Gastroenterology and Urology Branch, at the letterhead address.

Should you require any assistance in understanding the contents of this letter, do not hesitate to contact Tom Moore at the letterhead address or at (301) 594-4616 or FAX (301) 594-4638.

Sincerely yours,


Lillian J. Gill

Director
Office of Compliance
Center for Devices and
Radiological Health