



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Food and Drug Administration

M31831

1990 MacArthur Blvd., Ste 300
Irvine, California 92612-2445
Telephone (949) 798-7600

WARNING LETTER

NOV 5 1999

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Andre M. Pieters, President and Chairman of the Board
Pierre Fabre, Inc.
1055 West 8th Street
Azusa, CA 91746

W/L 07-00

Dear Mr. Pieters:

During an inspection of your manufacturing facility located at 230 South 9th Avenue, City of Industry, CA 91746, conducted August 18th through 25th 1999, an FDA investigator documented deviations from the Current Good Manufacturing Practices (cGMPs) for Finished Pharmaceuticals (Title 21, Code of Federal Regulations, (CFR) Part 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 Part 211 include:

1. 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)]. Specifically, you have no process validation procedures for any of your OTC drug products nor have you validated the performance of process equipment. Examples of non-validated process equipment include your deionized water system, homogenizers and filling machines used in the production of your OTC drug products.
2. Failure to establish and follow adequate written control procedures to validate the performance of manufacturing processes that may be responsible for causing variability in the characteristics of the in process material and the drug product [211.110(a)]. Specifically, you have no validated sampling procedure for your compound bulk products.
3. Failure to establish and document the accuracy, sensitivity and reproducibility of test methods employed [211.165(e)]. Specifically, you have not conducted validation for any of your stability test methods.
4. Failure to follow a testing program designed to assess the stability characteristics of drug products [211.166(a)]. Specifically, you are not conducting stability tests at the intervals required in your written stability test procedure.
5. Failure to maintain equipment to prevent malfunctions or contamination that would alter the safety, identity, strength and purity of the drug product, failure to establish and follow appropriate written procedures [211.67(a) and (b)]. Specifically, you have no validation that your cleaning and sanitation procedures prevent significant cross contamination from multi-use manufacturing process equipment.

6. 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 required to perform their assigned functions [211.25(a)]. Specifically, you hire temporary employees for the production of your drug products with limited manufacturing training and no documented cGMP training. In addition, your firm was unable to validate a compound bulk sampling procedure due to a "lack of technical expertise".

The above identification of violations is not intended to be an all-inclusive list of deficiencies at your City of Industry, CA facility. 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. Additionally, pending Antibiotic Form 6, New Drug Applications, Abbreviated New Drug Applications or export approval requests may not be approved until the above violations are corrected.

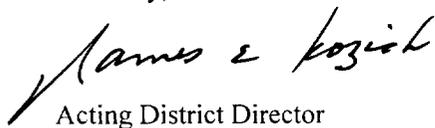
We acknowledge the commitment you made during the previous inspection to correct the previously observed deficiencies. However, many inspectional observations listed on the current FDA-483 are similar to those for which your firm has been cited as a result of the previous cGMP inspection. You should be aware that we consider several of the FDA-483 observations (lack of process validation, lack of validated stability indicating methods, lack of methods validation, lack of employee training/expertise) to be highly significant. In addition, it was noted during the inspection that your firm has failed to write, follow and/or document other procedures (such as laboratory control procedures and consumer complaint handling) as required in the 21 CFR Part 211. You should take prompt action to correct these deviations. Failure to promptly correct these deviations may result in regulatory action without further notice. Possible actions include 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,


Acting District Director

cc: Fredrick J. Kirchoff, Vice President, Operations
230 South 9th Avenue
City of Industry, CA 91746