U.S. FOOD & DRUG ADMINISTRATION

FDA REQUESTED RECALL

August 23, 2019

Mark L. Sangree
President
Director of Quality Operations
Pacifico National, Inc. dba AmEx Pharmacy
1515 Elizabeth Street, Suite J
Melbourne, FL 32901-3000

Mr. Sangree:

The U.S. Food and Drug Administration (FDA) requests that you immediately initiate a recall of all unexpired lots of drug products intended to be sterile, produced by Pacifico National, Inc. dba AmEx Pharmacy (hereinafter Pacifico National), and cease sterile operations until you have implemented adequate corrections at your facility.

FDA bases this request on inspectional findings from our inspection of your facility from April 15, 2019, through May 31, 2019. During the inspection, the FDA investigators observed poor aseptic practices and insanitary conditions in your aseptic processing areas that resulted in a lack of sterility assurance. Administration of a non-sterile product that is intended to be sterile presents a risk of infection to the individual patient. Intraocular medications that are not sterile can lead to intraocular infections such as endophthalmitis which, depending on the infecting microorganism, can lead to a permanent, partial or total loss of visual function (i.e., no light perception). The practices at your firm have the potential to pose a significant contamination risk to drug products that are intended to be sterile.

Drug products intended to be sterile that are produced at Pacifico National are adulterated within the meaning of section 501(a)(2)(A) and 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) [21 U.S.C. § 351(a)(2)(A)] [21 U.S.C. § 351(a)(2)(B)].

The following are among the most objectionable conditions identified at your firm:

1. The aseptic processing areas are deficient for producing drug products intended to be sterile. Visible discoloration that appears to be residue buildup was observed in your ISO 5 classified area, HEPA screen, and the interior side of the plexiglass window, where aseptic operations for sterile intravitreal drugs are performed. In your ISO 7 classified cleanroom #2, where aseptic operations for sterile intravitreal drugs occur, the investigators also observed visible discoloration that appears to be rust on a staging/supply cart (located approximately 3' from the ISO 5 classified LAFH) and residue on the ceiling.

Furthermore, the investigators also observed visible signs of what appears to be debris/dust build up on the ceiling located in this cleanroom #2 (ISO 7 classified area).

2. The investigators observed poor aseptic practices that pose a contamination risk, such as touching items outside of the ISO 5 classified hood with gloved hands and then reintroducing gloved hands into the hood without changing or sanitizing the gloves.

3. The environmental monitoring of your facility is inadequate. FDA investigators collected environmental sample 1105520 at your firm's facility on May 2, 2019. FDA analysis of this environmental sample revealed the presence of multiple microorganisms within your compounding facility, including but not limited to, *Staphylococcus epidermidis, Staphylococcus hominis ssp. Hominis, Paenibacillus glucanolyticus/(Bacillus circulans), Paenibacillus lautus*, and *Bacillus megaterium*. FDA classified sample 1105520 as violative (Class 3) due to these findings (sample summary document is attached). In addition, your firm failed to conduct viable air sampling during aseptic operations for each lot of Avastin (Bevacizumab) repackaged and (b) (4) Bevacizumab and Dexamethasone) produced for sterile intravitreal injection.

4. Your firm failed to conduct a thorough investigation of quality related complaints and has not taken appropriate corrective actions to assure the quality of your drug products. Your firm received complaints related to patients experiencing floaters (in the eyes), plungers not advancing, fibers found in the needles, eye inflammation, and loss of visual acuity. Although your firm is aware of the complaints, your Director of Quality Operations informed our investigators that the complaints of systemic plunger issues have not been investigated to a root cause determination with appropriate corrective action. In addition, on May 17, 2019, your firm's National Sales Manager received a consumer complaint concerning ten syringes of Avastin (Lot# 190325-N, Exp 07/08/2019) that had plungers that did not advance. Your Manager stated that she did not complete a complaint form although this complaint involved a report of patient harm. Pacifico National dispensed (b) (4) syringes from the same lot. However, your firm has not adequately addressed this complaint or the impact to other consumers that have received this lot.

We acknowledge receipt of your responses to the FDA dated June 26, 2019, which describe your proposed corrective actions and your recall of some products intended or purported to be sterile. However, your responses and partial recall do not adequately address the impact of objectionable practices and concerns listed above.

In addition, the Agency has been notified of six incidents involving Avastin products distributed by Pacifico National. These include four adverse events that occurred as the result of either sterility issues or plungers not advancing while the needle was in the

patient's eye. There was one additional report of eye inflammation and infection due to multiple injections.

FDA has determined that due to the lack of sterility assurance in producing purportedly sterile products, other quality issues mentioned above, and the information received by the Agency in the adverse event reports, these products represent a serious health hazard that outweighs the potential, if any, of a drug shortage. To date, Pacifico National has failed to initiate a recall of all drug products intended to be sterile that are within expiry.

FDA action is necessary to protect the public health and welfare. Based on the aforementioned public health concerns, FDA will classify this as a Class II recall. FDA recommends level A (100%) effectiveness checks be performed by your firm to the healthcare provider level.

FDA's recall policy and guidance are found in Title 21 Code of Federal Regulations (CFR), Part 7. FDA's Office of Regulatory Affairs, Division of Pharmaceutical Quality Operations II (ORAPHARM2) will provide guidance in implementing and assuring the effectiveness of your recall of these drug products to include reviewing the proposed recall communication to your consignees. We are requesting that you work closely with ORAPHARM2 and that you provide any necessary information regarding the recall in a timely manner. Title 21 CFR, Part 7 provides for publishing your recall in an upcoming issue of the weekly FDA Enforcement Report.

Please respond to this letter within 24 hours of receipt. Your response to this letter should be electronically directed to ORAPHARM2_RESPONSES@fda.hhs.gov and:

Monica R. Maxwell, Program Division Director
Office of Regulatory Affairs
Division of Pharmaceutical Quality Operations II
4040 North Central Expressway, Suite 300
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Due to the seriousness of this situation, FDA has issued a press release today advising consumers of the FDA Requested Recall letter and again warning consumers and retailers to discontinue use or further distribution of these drug products and of the health risk associated with the use of these drug products.

Failure to comply with this request may result in further regulatory action against you, your firm, and the adulterated drug products distributed by your firm.

Sincerely,

OBO MKP

Melinda K. Plaisier
Associate Commissioner for Regulatory Affairs

Enclosure: Sample Summary Report