DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2032 Rockville, MD 20857	8/28/2023-9/1/2023
	FEI NUMBER 3010166685

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Mr. Kenichi Ito, Representative Director, President	
FIRM NAME Oishi Koseido Co., Ltd.	STREET ADDRESS 2539-1, Yamaura-Machi
CITY, STATE, ZIP CODE, COUNTRY Tosu, Saga, 841-0084 Japan	TYPE ESTABLISHMENT INSPECTED Contract 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 I OBSERVED:

OBSERVATION 1

Changes to written procedures are not drafted, reviewed and approved by the appropriate organizational unit.

Specifically, Your firm commissioned construction of new building (b) (4) to manufacture commercial US market product (b) (4) ((b) (4) , this project was not handled via the change management system and no change control was issued to handle the building design and qualification of facilities. In addition, the performance qualification of the manufacturing areas was performed without a protocol and no report was generated to document the studies, summarize data generated, recommendations, and approval by the Quality Unit.

OBSERVATION 2

Input to and output from the computer and records or data are not checked for accuracy.

Specifically,

a) During the operational qualification (OQ) of (b) (4) GPD700 and (b) (4) IG710e your firm prepared (b) samples to create a calibration curve for the evaluation of the

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	DATE ISSUED
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(b) (4) However, there is no raw data for the "Actual Values" weight of the (b) (4) samples prepared. (b) (4) IG710e is used to measure the product (b) (4) during the (b) (4) operation.

b) On 8/30/23, during the evaluation of your QC laboratory controls, I noted that analyst can change the time and date on micro balance ID EW-10. This balance is used to measure sample weight or standards weight during the testing of (b) (4) API used for US market product (b) (4) and other chemical tests.

c) On 8/28/23, during the evaluation of your QC laboratory controls, I noted that analysts can delete and rename raw data files generated by Trapezium X in the computer connected to equipment (b) (4) When this was observed your QC Manager noted that this would be captured by the event log/audit trail, however the QC Manager and IT personnel failed to demonstrate that deletions are detected by the software event/audit trail log. On this date I also observed several files inside the trash bin of the computer, these files included files named (b) (4) (b) (4) the source of these files and the reason why they were in the window's recycling bin was not provided.

d) On 9/1/23, during the review of audit trails for Lab solutions conducted by your QC Managers Y.T and K.T., I observed (b) (4) injection sequence of standards deleted, but this was not documented and there we remarks as to the reason why they were deleted. The QC Supervisor noted that when the sequences are deleted prior to the acquisition of data no remark or justification is required, however these instructions are not specified in an SOP. I also noted SOP DM47101 used for review of audit trails is not comprehensive and does not include instructions on how to perform audit trail reviews for the different electronic systems such as Empower, Lab Solutions, and Trapezium X.

e) On 8/29/23, during the walkthrough of your QC laboratory, I observed that the analyst who

performed the identity test for raw material (b) (4) control number (b) (4) repeated the test three times without justification and approval. I asked the QC Manager Y.T. if she performed reviewed of audit trails for the FTIR data and the answer was no.

f) SOP PZTL9021, effective 12/24/21 used for the operation of (b) (4) GPD700 does not identify critical alarms for the equipment.

g) Your firm does not have videos or photographs to document the smoke studies conducted to evaluate the airflow of manufacturing areas in building (b) (4)

h) You have not defined the time limits for excursions of your stability chambers.

OBSERVATION 3

There is no written testing program designed to assess the stability characteristics of drug products.

Specifically, your firm has not established a written stability protocols to execute stability studies for commercial products. Your QC Head Ms. H.I. provided me with document DM04218-01 as a stability protocol, however this document does not contain information regarding which test methods will be used, sample size, storage conditions etc.

OBSERVATION 4

Written records of major equipment maintenance are not included in individual equipment logs.

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Specifically, your firm did not keep documentation of the equipment maintenance performed by your vendor on equipment ID 71-142 on March 20, 2023. In addition the last maintenance performed by the vendor on August 2023, noted that you need to monitor the temperature of the chiller because it might impact equipment performance, but your site does not document or monitor this data.

OBSERVATION 5

Labeling and packaging materials are not representatively sampled upon receipt and before use in packaging and labeling of a drug product.

Specifically, your sampling plan for primary packaging of (b) (4) requires sampling of (b) m of label, however there are no instructions that require the (b) meter of sample to be taken from different containers, therefore it is not clear if the sampling of this material is representative of the whole lot.

OBSERVATION 6

Reserve samples from representative sample lots or batches of drug products selected by acceptable statistical procedures are not examined visually at least once a year for evidence of deterioration.

Specifically, your firm does not have procedures describing the visual examination requirements for retain samples. In addition, when reviewing the log for retain sample examination, the results for the current yearly inspection are not documented.

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