U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

Via email: Dilip.Shanghvi@sunpharma.com
Return Receipt Requested

December 7, 2022

Mr. Dilip Shanghvi
Managing Director
Sun Pharmaceutical Industries Ltd.
Sun House, Plot No. 201 B/1
Western Express Highway
Goregaon East
Mumbai - 400063
Maharashtra, India

Reference: FEI 3002809586

Dear Mr. Shanghvi:

The United States Food and Drug Administration (FDA) has reviewed the Form FDA 483 and establishment inspection report (EIR) and your response to the Form FDA 483 pertaining to the inspection conducted at Sun Pharmaceutical Industries Ltd., at Halol-Baroda Highway, Dist. Panchmahal, Halol - 389350, Gujrat, India, from April 26, 2022, to May 9, 2022.

We have determined from our review of the cited deficiencies that all drugs manufactured at this facility are subject to refusal of admission pursuant to section 801(a)(3) of the Federal Food, Drug, and Cosmetic Act (the FD&C Act) in that the methods used in, or the facilities or controls used for, their manufacture, processing, packing, or holding do not appear to conform to current good manufacturing practice (CGMP) within the meaning of section 501(a)(2)(B) of the FD&C Act.

Your firm is listed under Import Alert 66-40, whereby all future shipments of drugs that originate from your facility may be refused admission into the United States (U.S.) until your firm can demonstrate the drugs manufactured at this site, and intended for the U.S. market, are in compliance with CGMP. We have not included under this import alert the following medically necessary drugs for which there are shortage implications:

- Calcitriol Capsules
- Decitabine Injection
- Carbidopa and Levodopa ER Tablets
- Digoxin Tablets
- Divalproex Delayed Release Tables
- Doxorubicin HCl Liposomal Injection
- Erlotinib Tablets
- Imatinib Tablets
- Leuprolide Injection
- Levonorgestrel Tablets

- Oxcarbazepine Tablets
- Temozolomide Capsules
- Tiagabine Tablets
- Vecuronium Injection

The drugs on this list will be reconsidered if shortage and medical necessity implications change.

Until then, with regards to all lots of the drugs identified above as excluded from the import alert, we recommend the following protocol be implemented for oversight of the quality of the drugs you offer for importation to the U.S.:

- Batch certification must be performed by an independent third-party confirming that every lot excluded from IA 66-40 and shipped to the U.S. meets the quality attributes.
- The independent third-party review must include a detailed evaluation of all batch manufacturing records, in-process and finished product test results including the associated electronic data, all deviations, and applicable environmental monitoring records, as well as visual inspection records. Triplicate testing for every lot imported.
- To avoid interruption of the supply of these critical drugs, the third-party certification can be completed within 15 days of the batches being tested and approved for release by the sites Quality Unit.
- In the event of any out-of-specification (OOS) or unexpected result, a comprehensive investigation must be conducted and documented, and reviewed and approved by an independent third-party. The affected batch would not be released until the third party can complete its review of the investigation and determine if the batch can be certified. The third-party evaluation of the lot will include special attention to all test results and investigations, and the agency will be notified before releasing the batch if such batch is to be certified and sent to the U.S. market directly or shipped to a subsequent finished product manufacturer who ships drug products to the U.S. market. The batch certification must indicate the batch was involved in an OOS or unexpected result investigation that was reviewed and certified by the independent third-party, and that such review confirmed the OOS or unexpected result had no impact on the quality of the drug product.
- Your firm must commit to perform three media fill runs for each injectable product, which must be certified by an independent third party as conducted according to the agency's expectation, as outlined in the 2004, FDA *Guidance for Industry Sterile drug Products Produced by Aseptic Processing – Current Good Manufacturing Practice*. (https://www.fda.gov/regulatory-information/search-fda-guidance-documents/sterile-drug-products-produced-aseptic-processing-current-good-manufacturing-practice) Should any media fill fail to meet the established specifications, your firm should notify the U.S. FDA.

If you have questions or concerns regarding this letter, contact Ganesh Joshi, Compliance Officer, at CDER-OC-OMQ-Communications@fda.hhs.gov.

Sincerely,

Carmelo R. Rosa -S

Digitally signed by Carmelo R. Rosa -S
Date: 2022.12.07 14:15:47 -05'00'

Carmelo Rosa, Psy.D.
Director, Division of Drug Quality I
Office of Manufacturing Quality
Office of Compliance
Center for Drug Evaluation and Research