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	2/20/2023-2/28/2023*
	FEI NUMBER 3001623073

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Christopher S Preti, President

FIRM NAME	STREET ADDRESS
Jubilant HollisterStier General Partnership	16751 Rte Transcanadienne
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Kirkland, H9H 4J4	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 WE OBSERVED:

OBSERVATION 1

The statistical quality control criteria fail to include appropriate acceptance levels and rejection levels.

Specifically,

1 A) Reject rates were exceeded for (b) (4) solution (b) (4) mL, lots (b) (4), (b) (4), and (b) (4) during visual inspection and the batches were released without appropriate justification. Your firm's reject criteria is set at (b) (4) % for critical defects during visual inspection, however these batches had reject rates of (b) (4) %, (b) (4) % and (b) (4) %, respectively. These batches failed initial AQL for product defects and underwent 100% inspection. According to investigation PR# 111595, this product's bottle and tip supplier is the most likely source of particulates. The source of the particulates is from a (b) (4) bag which is shedding particulates into the bottles and tips. This supplier also provides components for finished product (b) (4), which uses the same bags that are likely the source of product contamination. (b) (4) lots of (b) (4) and (b) (4) solution have been produced and released since 2021 using this supplier with a known source of particulate contamination. Complaints received associated with the use of these bags include adverse events for redness, swelling, and pain as well as defective bottles with the tip not dispensing. This particle shedding bag was not considered a contributing factor during complaint investigations.

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3 B) Your firm does not provide any assurance that (b) (4) Solution products are free of visible particulates when packaged in (b) (4) container closure systems. No supplemental destructive testing for particulate analysis and no visual inspection is performed for the following products: (b) (4)

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE		DATE ISSUED
	Rafeeq A Habeeb, Investigator Logan T Williams, Investigator	X Rafeeq A Habeeb Investigator Signed By 2002600695 Date Signed 02-28-2023 16 08 22	2/28/2023

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(b) (4) solution (b) (4) % (b) (4) mL and (b) (4) Solution (b) (4) % (b) (4) mL and (b) (4) % (b) (4) mL. Your firm has performed a Medical Risk Assessment which concludes, "the risk to the patients by not inspecting (b) (4) and (b) (4) products filled in (b) (4) containers for visible particles is considered low and acceptable for these types of products".

OBSERVATION 2

Procedures designed to prevent microbiological contamination of drug products purporting to be sterile did not include adequate validation of the aseptic process.

Specifically,

Your firm does not assure that media fills are representative of routine production because media fills do not simulate your production process. Recurring interventions were not adequately performed.

A) During (b) (4) Trial (b) (4) (b) mL) lot (b) (4), unblocking a bottle from a (b) (4) /chute was performed (b) (4) time during the media fill. During actual production of (b) (4) (b) (4) Solution (b) (4) mL lot (b) (4), bottle stuck interventions in the (b) (4), (b) (4), (b) (4), and chute occurred approximately (b) (4) times. These various bottle stuck interventions were classified as non-routine interventions and were performed (b) (4) time only for unblocking a bottle in the chute and unblocking a bottle in the (b) (4) during the (b) (4) Trial (b) (4) (b) mL) lot (b) (4). Bottle stuck interventions made up over (b) (4) interventions in the (b) batches run on the (b) (4) line in 2021. Trending of interventions is performed (b) (4) and has not been completed for 2022.

B) Intervention ratings from, "RISK ASSESSMENT OF THE ROUTINE AND NON-ROUTINE INTERVENTIONS PERFORMED BY OPERATORS AND MAINTENANCE PERSONNEL

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DURING (b) (4) LINE OPERATION", for inclusion in media fills do not include a frequency of occurrence criteria. Currently interventions are evaluated for inclusion in media fills based on product contamination, proximity to critical contact parts, location of the intervention in relation to filling level, the level of dexterity necessary to carry out the interventions, and impact on room environment. Frequency of interventions is currently based on the number of operators needing qualification. Each operator performs a media fill intervention (b) (4) time during the media fill to be qualified. For instance, if 11 operators are present during the media fill, then (b) (4) routine interventions will be performed in the media fill regardless of actual intervention frequency during production.

OBSERVATION 3

Laboratory records do not include the initials or signature of a second person showing that the original records have been reviewed for accuracy.

Specifically,

Your firm does not have a second reviewer to verify the accuracy of microbial testing results (CFU and sterility) of finished drug products, raw materials, (b) (4) testing, and environmental monitoring (EM) except for Grade-A EM.

OBSERVATION 4

Laboratory records are deficient in that they do not include a statement of the results of tests and how they compare to the established specifications.

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Specifically,

You do not compare the growth promotion results for selective media including (b) (4) to previously tested and approved batches of media.

***DATES OF INSPECTION**

2/20/2023(Mon), 2/21/2023(Tue), 2/22/2023(Wed), 2/23/2023(Thu), 2/24/2023(Fri), 2/27/2023(Mon), 2/28/2023(Tue)

X Logan T Williams
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EMPLOYEE(S) SIGNATURE

Rafeeq A Habeeb, Investigator
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16:08:22

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