

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT OFFICE ADDRESS AND PHONE NUMBER CBER/OCBQ/Division of Manufacturing and Product Quality 10903 New Hampshire Avenue, Silver Spring, MD 20993 Lead Insp.: Ou Olivia Ma Telephone: 301-796-8213 Industry Information: www.fda.gov/oc/industry	DATE(S) OF INSPECTION October 7 - 11, 2024
	FBI NUMBER 3006500433

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED
TO: Ahmad Hussin, Site Director Charles River Laboratories, Memphis

FIRM NAME Charles River Laboratories, Inc	STREET ADDRESS 4600 East Shelby Drive, Suite 108
CITY, STATE AND ZIP CODE Memphis, TN 38118	TYPE OF ESTABLISHMENT INSPECTED Cell and Gene Therapy

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) (WE) OBSERVED:

1. The oversight of Quality Assurance (QA) is deficient in ensuring the timely handling of deviations including the initiation, investigation and closure, in addition to the implementation and completion of corrective actions as exemplified by:

a. DI-23-461 was initiated on August 23, 2023 due to the failure to perform the requalification for control temperature units (CTU), specifically, (b) (4) EQ ID (b) (4) and (b) (4) in room (b) (4) per established procedures SOP-00061 and SOP-00232. Last completed qualification were performed during the equipment's Installation and Operational Qualifications (IOQ) in 2017. Deviation was closed ten months later on June 26, 2024 with two CAPAs (CAPA 23-126 and CAPA 24-95) that were still pending completion. (b) (4) are still not re-qualified and are currently used for (b) (4)

b. DI-22-203 and DI-22-303 were initiated on June 2, 2022 and August 11, 2022 due to (b) (4) EQ ID (b) (4) (b) (4) performing above temperature parameters. CC-22-139 was initiated to replace a (b) (4) that was at the end of its lifetime and that was linked to both deviations. However, no additional corrective actions were required to (b) (4). It was only until the initiation of the third reoccurring deviation, DI-22-373 on November 7, 2022, where the immediate corrective action (b) (4) (b) (4) was performed.

c. DI-23-036 refers to a critical deviation occurring on December 23, 2023. The notification of event for this deviation should have been submitted within one business day but was not submitted until January 1, 2024. Additionally, a maximum of two 45-day extensions are allowed for investigations of critical deviations; however, DI-24-036 remains open more than six months after the 2nd extension request was submitted on April 8, 2024.

2. The environmental controls and manufacturing process are not sufficient to ensure sterility of the (b) (4) product, specifically:

SEE REVERSE OF THIS PAGE	/S/	EMPLOYEE(S) NAME AND TITLE (Print or Type) Ou Olivia Ma, Consumer Safety Officer Christine Harman, Lead Consum. Safety Officer Grace Forsythe-Catesini, Biological Reviewer Matthew Klinckov, Supervising Biologist Brenton McLain, Biologist CMC Reviewer	DATE ISSUED 11 Oct 2024
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a. During the time period of July – September 2024, several (b) (4) microbial contamination events occurred in (b) (4) and (b) (4) (Lot (b) (4) / DEV-00387, Lot (b) (4) / DI-24-501, Lot (b) (4) / OOS-24-017, and Lot (b) (4) / DEV-00398). During the same time period, environmental monitoring (EM) results demonstrated a considerable number of action level excursions including personnel, viable air, and surface sampling excursions in the (b) (4) (Grade (b) (4) / ISO (b) (4)) and the (b) (4) Grade (b) (4) / ISO (b) (4)) inside (b) (4).

Preventative actions have not been identified, root cause analyses of these deviations have been delayed and these (b) (4) contamination deviations have not been evaluated in conjunction with the associated EM excursions. Effective actions should be taken in a timely manner to address recurring EM deviations and product contaminations.

b. (b) (4), which is not purchased as a (b) (4), is (b) (4) (b) (4) (b) (4). The (b) (4) is used in the (b) (4) process; however, the (b) (4) of the (b) (4) is not validated.

3. Your procedures for testing and qualifying raw materials used in the manufacture of (b) (4) are deficient. At least one specific (b) (4) test must be completed on each lot of each component, and such lots must be withheld from use until the lot has been sampled, tested, and released for use by the quality control unit. However, (b) (4) used in the (b) (4) manufacturing process are not currently tested for (b) (4) after receipt from the supplier.

SEE REVERSE OF THIS PAGE	/S/	EMPLOYEE(S) NAME AND TITLE (Print or Type) Ou Olivia Ma, Consumer Safety officer	DATE ISSUED
		Christine Harman, Lead Consum. Safety officer Grace Forsythia Cortesini, Biologist Reviewer Matthew Elliott, Supervisory Biologist Brenton McCreight, Biologist CRB Reviewer	11 Oct 2024

The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or
2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgement, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."