DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
5600 Fishers Ln Rockville, MD 20857 (301)443-6230 orabioinspectionalcorrespondence@fda.hhs.gov Industry Information: www.fda.gov/oc/industry	9-16 December 2022
	FEI NUMBER 3002809097

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Dr. Barbara Rangetiner

FIRM NAME	STREET ADDRESS
Octapharma Pharmazeutika Produktionsgesellschaft m.b.H. OPG	Oberlaaer Strase 235
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Vienna, Austria 1100	Biologics Blood Product 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) (WE) OBSERVED:

OBSERVATION 1

Buildings used in the cGMP manufacture, processing, packing or holding of drug products are not maintained in a clean and sanitary condition and free of infestation by (b)(4) contamination.

Specifically,

A. The plant (b)(4) period that occurs for (b)(4) is not managed in a controlled manner to prevent, detect, clean and sanitize cGMP areas including classified areas (Grade (b)(4)). Environmental monitoring is not conducted during the plant (b)(4) period. (b)(4) and HEPA air filtration systems, (b)(4) for controlled spaces are not maintained. Cleaning and plant (b)(4) occurs after this (b)(4) plant (b)(4). Cleaning validations are not assured as accurate and continuously valid as environmental (b)(4) are not collected and tested for during the plant (b)(4) period.

B. The firm's (b)(4) control management is inadequate. The firm is not in control of the (b)(4) management data, this is managed by the (b)(4) and is available in a read only manner but the firm is not trending the locations of the (b)(4) and cannot assure that (b)(4) are not (b)(4) cGMP areas of production, (b)(4), or other areas. The firm reports aggregate numbers of (b)(4) every (b)(4), for example, in July 2022 there were: 13 (b)(4), 1 (b)(4), 24 other (b)(4), 86 (b)(4) in (b)(4) in production areas, and 1461 (b)(4) in (b)(4) in other areas. But these total number of (b)(4) are not readily or routinely monitored to distinguish cGMP areas including (b)(4), production, QC labs, and other critical areas, from (b)(4) and administration areas.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
	Roger F. Zabinski -S Digitally signed by Roger F. Zabinski -S Date: 2022.12.16 16:16:05 +01'00' Yonggang Wang -S Digitally signed by Yonggang Wang -S Date: 2022.12.16 16:17:25 +01'00'	Roger F. Zabinski, Investigator - Team Biologics Yonggang Wang, Ph.D., Biologist - CBER	12/16/2022

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
5600 Fishers Ln Rockville, MD 20857 (301)443-6230 orabioinspectionalcorrespondence@fda.hhs.gov Industry Information: www.fda.gov/oc/industry	9-16 December 2022
	FEI NUMBER 3002809097

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Dr. Barbara Rangetiner

FIRM NAME	STREET ADDRESS
Octapharma Pharmazeutika Produktionsgesellschaft m.b.H. OPG	Oberlaaer Strase 235
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Vienna, Austria 1100	Biologics Blood Product Manufacturer

OBSERVATION 2

There is no assurance of effective training or accurate deviation root cause assignment for employees engaged in sampling, testing, data reporting and data review from the Quality Control Unit and Production Unit. The following deviations were reported to be due to human error or due in part to employees who were inadequately trained in the cGMP procedures. These include but are not limited to:

Specifically,

A. Deviation, TW# 111834, dated 10-Sep-2019, (b)(4) Sample (b)(4) for storage at (b)(4) was not traceable because the sample was lost and could no longer be found.

B. TW#136664, dated 12-Nov-2020, reports an incorrectly calculated result. The incorrect evaluation was not noticed during the raw data review.

C. Deviation, TW#139567, dated 05-Jan-2021, (b)(4) result in (b)(4) due to suspected mislabeling.

D. Deviation, TW# 161584, dated 19-Feb-2022, wrong storage of sample (b)(4) Batch (b)(4) in (b)(4).

E. Deviation, TW#163601, dated 29-Mar-2022, Result of molecular size distribution of (b)(4) of (b)(4) batches (b)(4) and (b)(4) was reported with wrong (b)(4).

F. Deviation, TW#177497, dated 14-Sep-2022, Submission of a wrong result for total protein for (b)(4) to department (b)(4).

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
		Roger F. Zabinski, Investigator - Team Biologics Yonggang Wang, Ph.D., Biologist - CBER	12/16/2022

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
5600 Fishers Ln Rockville, MD 20857 (301)443-6230 orabioinspectionalcorrespondence@fda.hhs.gov Industry Information: www.fda.gov/oc/industry	9-16 December 2022
	FEI NUMBER 3002809097

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Dr. Barbara Rangetiner

FIRM NAME	STREET ADDRESS
Octapharma Pharmazeutika Produktionsgesellschaft m.b.H. OPG	Oberlaaer Strase 235
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Vienna, Austria 1100	Biologics Blood Product Manufacturer

OBSERVATION 3

Deviations from production material holding time limits are not justified.

Specifically,

There is a lack of written procedure describing in sufficient detail the storage of the materials taken out of the (b)(4) during production. Scientifically justified temperature hold time is lacking for the (b)(4) when taken out of the (b)(4) (less than (b)(4)). The time allowed that this material can be stored at (b)(4) ((b)(4)) before the (b)(4) is crushed and (b)(4) is not defined.

OBSERVATION 4

Deviations from written Quality Control test procedures for holding temperature and time of reference standards are not justified.

Specifically,

(b)(4) for laboratory testing are not properly stored to ensure the quality is intact. During the Quality (b)(4) walk through, (b)(4) of reference materials used for determination of (b)(4) ((b)(4) with recommended storage condition of (b)(4)) and (b)(4) control (lot # (b)(4) with recommended storage condition of (b)(4)) were left unattended on the bench at the (b)(4) (b)(4) and not maintained in a (b)(4) after being used for testing for more than (b)(4) (b)(4) .

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
		Roger F. Zabinski, Investigator - Team Biologics Yonggang Wang, Ph.D., Biologist - CBER	12/16/2022

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
5600 Fishers Ln Rockville, MD 20857 (301)443-6230 orabioinspectionalcorrespondence@fda.hhs.gov Industry Information: www.fda.gov/oc/industry	9-16 December 2022
	FEI NUMBER 3002809097

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Dr. Barbara Rangetiner

FIRM NAME	STREET ADDRESS
Octapharma Pharmazeutika Produktionsgesellschaft m.b.H. OPG	Oberlaaer Strase 235
CITY, STATE AND ZIP CODE Vienna, Austria 1100	TYPE OF ESTABLISHMENT INSPECTED Biologics Blood Product Manufacturer

OBSERVATION 5

Corrective actions and preventive actions (CAPAs) to discrepancy or the failure of a batch or any of its components to meet any of its specifications are not always effectively verified to prevent recurrent deficiencies. The following repeated deviations with the same or similar root cause were reported.

Specifically,

A. Temperature control deviations for (b)(4) (TW#136473, dated 09 November 2020; TW#: 153413, dated 17 September 2021; TW#153881, dated 27 September 2021; TW#153934, dated 28 September 2021; TW#154785; TW#159379, dated 11 January 2022; TW#165772, dated 09 May 2022).

B. Final container products waiting for repacking stored at packaging line and stayed over routine procedures repeatedly (TW121137, dated 20 February 2020; TW# 174998, dated 04 November 2022; and TW# 1641796, dated 12 April 2022).

OBSERVATION 6

Failure to adequately assure approved levels of measles neutralizing antibody in the final product. The Out of Specifications (OOS) results were not sufficiently investigated for the root cause.

Specifically,

A total of (b)(4) Measles OOS routine batches occurred to multiple Immune Globulin Final Container products within two aggregate period 1) from July to Sept 2019 and 2) from August to Sept 2022. The root cause was attributed to the (b)(4) materials but the other factors and/or conditions were not accounted for, including but not limited to, blood collection center, differences in manufacturing among the firm's facilities where no such events occurred, and re-evaluation of the external laboratory for the test.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
		Roger F. Zabinski, Investigator - Team Biologics Yonggang Wang, Ph.D., Biologist - CBER	12/16/2022

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
5600 Fishers Ln Rockville, MD 20857 (301)443-6230 orabioinspectionalcorrespondence@fda.hhs.gov Industry Information: www.fda.gov/oc/industry	9-16 December 2022
	FEI NUMBER 3002809097

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Dr. Barbara Rangetiner

FIRM NAME	STREET ADDRESS
Octapharma Pharmazeutika Produktionsgesellschaft m.b.H. OPG	Oberlaaer Strase 235
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Vienna, Austria 1100	Biologics Blood Product Manufacturer

OBSERVATION 7

(b)(4) data is not assured as exact, complete and secure from alteration, erasure or loss through keeping (b)(4) copy or alternate systems. (b)(4), related systems of (b)(4) or data are not checked for accuracy.

Specifically,
The firm's data management and data archive procedures are lack instructions to routinely perform annual data audit checks of the archived (b)(4) and (b)(4) cGMP analytical QC data and production batch records.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
		Roger F. Zabinski, Investigator - Team Biologics Yonggang Wang, Ph.D., Biologist - CBER	12/16/2022

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."