DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA/ORA/OPQO HQ, Room #2032 12420 Parklawn Drive, Rockville, MD 20857 301 796-8744 ORAPHARMInternational483responses@fda.hhs.gov. Industry Information: www.fda.gov/oc/industry	08/12/24, 08/13/24, 08/14/24, 08/15/24, 08/16/24
	FEI NUMBER 3006512854

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Mr. Chenlai Xia (Vice President)

FIRM NAME	STREET ADDRESS
Qingdao Kangyuan Pharmaceutical Co. Ltd.	Yinghai Industrial Park
CITY, STATE AND ZIP CODE Jiaozhou City Qingdao Shandong 266300 China	TYPE OF ESTABLISHMENT INSPECTED API Drug Manufacturer

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DURING AN INSPECTION OF YOUR FIRM (I) (WE) OBSERVED:

FACILITIES AND EQUIPMENT SYSTEM

Observation 1

Laboratory controls do not include scientifically sound and appropriate specifications, sampling plans and test procedures designed to assure that raw materials conform to established standards of quality and/or purity.

Specifically,

Your firm failed to monitor the water system, so it consistently produces pharmaceutical grade water that, at a minimum, meets the USP monograph for (b) (4) water and appropriate microbial limits. Your firm's current test methods used to detect objectionable microbiological contamination in water used to manufacture APIs do not include microbial testing methods to detect the presence of objectionable organisms such as Burkholderia cepacia complex, Escherichia coli or Staphylococcus aureus.

Furthermore, your firm (b) (4) water sampling Standard Operating Procedure titled "Water for Production Use Operational Procedures STP", Version No:10, Effective Date: 08/02/2024, SOP Number: 09-224 specifies in section 5.1.4.2.2.4 that a (b) (4) will be performed (b) (4) the QA personnel collecting the water sample. Your firm Standard Operating Procedure titled (b) (4) Water System Operating, Maintenance and Cleaning", Version No:11, Effective Date: 08/02/2024, SOP Number: 02-104 used to instruct operators on the use of (b) (4) water in the manufacturing areas does not establish a (b) (4) use.

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		Alan A. Rivera, Investigator Chad Rice, Investigator	08/16/2024

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Your sampling methods are not representative of the actual water use practices at your firm production areas. (b) (4) water is used as a raw material in the manufacturing process of your API.

PRODUCTION SYSTEM

Observation 2

The master batch production record lacks an established time limit and detailed production instructions to ensure the quality of intermediates and APIs are met for individual processing steps and/or total process.

Specifically,

Your firm failed to establish and document a specific time limit in the Batch Manufacturing Record (BMR) for the (b) (4) step in the crude manufacturing process of (b) (4) Additionally, there is (b) (4) occurring during the (b) (4) process that is not being recorded in the manufacturing record. Your firm operates (b) (4) with different capacities (b) (4) Each (b) (4) has different capabilities, causing the (b) (4) time to vary from batch to batch.

Similarly, your firm did not record the duration of the (b) (4) process following the (b) (4) steps. The current Batch Manufacturing Record (BMR) logs the total time taken to complete all (b) (4) loads but fails to document the time for each individual load. Although your firm has set a minimum (b) (4) time of (b) (4) load, it did not document whether this time requirement was met for each load.

LABORATORY SYSTEM

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Observation 3

Failure to validate and verify the suitability of analytical methods.

Specifically,

Your firm is using the Chinese Pharmacopeia for identity testing of [redacted] (b) (4) a raw material used in the production of [redacted] (b) (4) However, you have not validated or verified that the Chinese Pharmacopeia identity test method for [redacted] (b) (4) is equivalent to, or better than, the U.S. Pharmacopeia (USP) identity test method for the same substance.

FACILITIES AND EQUIPMENT SYSTEM

Observation 4

Equipment used in the manufacture of intermediates and API's should be maintained in a good state of repair to prevent contamination that would alter the safety, identity, strength, quality and purity of the drug product.

Specifically,

During the inspectional walkthrough, on 08/12/2024 it was observed that your firm failed to maintain equipment

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used in the manufacturing of API and intermediates in a good state of repair. Your (b) (4) located in building (b) (4) used in the manufacture of (b) (4) had (b) (4) material flaking into the (b) (4) Your firm's equipment preventive maintenance records show that a preventive maintenance check was performed on 08/01/2024, but this deficiency was not addressed.

Furthermore, (b) (4) and (b) (4) located in building (b) (4) used in the manufacture of (b) (4) were marked as cleaned, but had what appeared to be rust flakes at the bottom of the (b) (4) Upon further inspection, it was determined that the rust flakes originated from the (b) (4) (b) (4) located on top each (b) (4)

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