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

| DISTRICT ADDRESS AND PHONE NUMBER | DATE(S) OF INSPECTION |
|---|---|
| 12420 Parklawn Drive, Room 2032<br>Rockville, MD 20857 | 5/4/2023-5/12/2023* |
| | FEI NUMBER<br>3009310198 |

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Raju A. Gujare, Senior Vice President Global Operations and Technical Services

| FIRM NAME | STREET ADDRESS |
|---|---|
| Micro Labs Limited | Plot No. 113-116 4th Phase Kiadb,<br>Bommasandra Industrial Area, Anekal Taluk |
| CITY, STATE, ZIP CODE, COUNTRY | TYPE ESTABLISHMENT INSPECTED |
| Bangalore, 560099 India | Sterile Drug 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 OBSERVED:**
Laboratory Control System

## OBSERVATION 1

Written records of investigations into unexplained discrepancies do not include the conclusions and follow-up.

Specifically,

A. OOS investigation 23-025 was initiated on 02/08/2023 due to assay OOS results obtained in the stability studies for (b) (4) solution, USP (b) (4)% w/v with a shelf life of (b) (4) (b) (4) The specifications for (b) (4) assays are (b) (4)%-(b) (4)%. The following table provides the OOS results for (b) (4) Assays at long term condition storage (25°C +/- 2°C/40%RH+/-5%RH)

| Commercial Batch Number | Orientation | (b) (4) Assay (%) | (b) (4) Assay (%) | Months |
|---|---|---|---|---|
| (b) (4) | inverted | (b) (4) | (b) (4) | 33 |
| | inverted | | | 33 |
| | inverted | | | 33 |
| | upright | | | 33 |
| | upright | | | 33 |
| | upright | | | 33 |

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EMPLOYEE(S) SIGNATURE
Jose F Velez, Investigator

Jose F Velez
Investigator
Signed By 2000547088
Date Signed 05-12-2023
14 30 53
X

DATE ISSUED
5/12/2023

Your firm is the contract manufacturer for a (b) (4) holder that distributes these batches to US market. The (b) (4) holder submitted an FAR on 02/15/2023. Subsequently, another (b) (4) Assay OOS assay results were obtained during stability studies at long term storage condition on 03/21/2023:

| Commercial Batch Number | Orientation | (b) (4) Assay (%) | (b) (4) Assay (%) | Months |
|---|---|---|---|---|
| (b) (4) | inverted | (b) (4) | (b) (4) | 24 |
| | upright | | NA | 24 |

A follow up FAR was submitted on 03/28/2023 by the (b) (4) holder. (b) (4) batches are within the expiration date for a total of (b) (4) units he (b) (4) holder. Your firm recommended to reduce the shelf life from (b) (4) to (b) (4) and take field action. However, the (b) (4) holder has not decided the impact of OOS results on the batches available in US market. st probable root cause was identified as (b) (4) loss from the (b) (4) container (b) (4). Your firm was using container (b) (4) for the following products: (b) (4) (b) (4) Solution USP until 03/08/2023 and (b) (4) and (b) (4) (b) (4) Solution, USP change in the container grade is being implemented. However, your quality unit failed to extend the investigation to these products to confirm if issues with (b) (4) loss might be observed to determine any impact to critical quality attributes such as assay.

B. OOS investigation 22-126 was initiated on 12/24/2022 due to a result obtained for unknown impurity at Relative Retention Time (RRT) (b) (4) with (b) (4)% for the analysis of related substances for (b) (4) Injection Solution USP (b) (4) mg/(b) (4) mL, Batch (b) (4) (after (b) (4) The specification limit for the related substances for total impurity is no more

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than (b) (4)%. My review of the investigation found that the hypothesis established by the firm to invalid the OOS was not adequate since the review of the chromatograms and analytical work record in process did not confirm that the analyst selected the wrong reagent during the mobile phase preparation. The sample was repeated and obtained satisfactory results. (b) (4) units of batch (b) (4) were released to US market distribution on 01/30/2023.

This observation is repeated from the previous inspection completed on 03/22/2018.

Production System

**OBSERVATION 2**

Control procedures are not established which monitor the output and validate the performance of those manufacturing processes that may be responsible for causing variability in the characteristics of in-process material and the drug product.

Specifically,

A. During my review of validation report VR: (b) (4) PV:A:001, approved on 11/23/2021, I found that the (b) (4) API addition, (b) (4) stages, the (b) (4) (b) (4) speed range established was (b) (4) RPM (b) (4) RPM (targe (b) (4) RPM). However, the tank with (b) (4) (14TLSV-002) speed obtained was (b) (4) RPM, (b) (4) RPM, and (b) (4) RPM for the exhibit batches # (b) (4) respectively. The obtained speeds were approved by the quality unit without the adequately review of the Process Development Report PDR (b) (4) 22/031, approved 08/05/2022 which established the speed range from (b) (4) RPM (b) (4) RPM. Your firm failed to adequately justify the in-process controls out of the established range for critical process parameters during the execution of process validation for exhibit batches of (b) (4)

| SEE REVERSE OF THIS PAGE | EMPLOYEE(S) SIGNATURE | DATE ISSUED |
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| | Jose F Velez, Investigator<br>X Jose F Velez Investigator Signed By 2000547088 Date Signed 05-12-2023 14 30 53 | 5/12/2023 |

Suspension (b) (4) % w/v.

B. During the (b) (4) of (b) (4) used as surface active agent in the manufacturing of exhibit batches of (b) (4) Suspension (b) (4) % w/v, your firm obtained the following (b) (4) times: (b) (4) for batch (b) (4), (b) (4) for batch (b) (4) and (b) (4) for batch (b) (4) There is no justification provided in the Validation Report VR: (b) (4):PV:A:001, approved on 11/23/2021 for the difference in (b) (4) times for batch (b) (4) As per my inquiry, the Production Manager informed that modification of the addition of (b) (4) were performed during the execution of batch (b) (4) to reduce the (b) (4) time, but there is no approved documentation for the modification.

C. My review of batch record BMR1:(b) (4)US01, effective date 09/04/2021 for the manufacturing of (b) (4) Suspension (b) (4) w/v found that there is no documentation of the net weight for the addition of the sterile (b) (4) API. Your firm received the sterile (b) (4) API in a pre-dispensed pack from the supplier and during the addition of the API stage, the operators recorded the gross weight only of the pre-dispensed pack. According to your supplier, the pre-dispensed pack has a label with the net weight, but there is no documentation in the batch record to confirm the amount of sterile API added to the formulation of (b) (4) Suspension (b) (4) % w/v.

## OBSERVATION 3

Your firm failed to establish adequate written procedures for production and process controls designed to assure that the drug products have the identity, strength, purity, and quality that they are purported or represented to possess.

Specifically,

During an inspectional walkthrough on 05/12/2023 to room (b) (4) where a 100% visual inspection was

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being conducted for (b) (4) Injection Solution (b) (4) mg (b) (4) mL, batch (b) (4) , size (b) (4) I observed the movement of the vials prior and after the visual inspection performed by the operators was not conducted in a manner to prevent scratches and other types of defects to the vials. SOP: ML14/SOP/PROP/0066-026, "Manual Inspection of Filled and Sealed Ampoules and Vials", effective date: 02/08/2023, section 5.8 states the transfer that crates containing product from unpacked quarantine to visual inspection. However, there are no instructions to alert production personnel to transfer the vials in a manner that will prevent scratches and other defects.

***DATES OF INSPECTION**

5/04/2023(Thu), 5/05/2023(Fri), 5/08/2023(Mon), 5/09/2023(Tue), 5/10/2023(Wed), 5/11/2023(Thu), 5/12/2023(Fri)

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|---|---|---|---|
| | Jose F Velez, Investigator | X Jose F Velez<br>Investigator<br>Signed By 2000547088<br>Date Signed 05-12-2023<br>14 30 53 | 5/12/2023 |