DEPARTMENT OF HEAL			
FOOD AND DRUG	G ADMINISTRAT	TION	
DISTRICT ADDRESS AND PHONE NUMBER		DATE(S) OF INSPECTION	
10903 New Hampshire Avenue, Building 51, Room 4225,		12/07/2016-12/16/2016*	
Silver Spring, MD 20993-0002			
Phone: (301) 796-3334, Fax: (301) 847-8738		FEI NUMBER	
Industry Information: www.fda.gov/oc/industry NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	3008307735		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED		The state of the s	
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice	e President	Operations	
FIRM NAME	STREET ADDRESS		
Hetero Labs Limited	Hetero Labs Limited TSIIC Pharma SEZ		
CITY, STATE, ZIP CODE, COUNTRY  TYPE ESTABLISHMENT INSPECTED			
Polepally Village, Jadcherla Mandal, Mahaboob Nagar Dis- Oral Solid Dose Drug Product Manufacturer			
trict, Telangana State, 509301, India			

This document lists observations made by the FDA representatives 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 representatives 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 responsibilities and procedures applicable to the quality control unit are not fully followed.

(1) Specifically, your QA technicians and other individuals were recorded destroying and altering records pertaining to commercial batch manufacturing immediately prior to this regulatory inspection. The loss of data and documents are evidenced by the following:

Through a review of your firms Closed Circuit TV we identified the following:

- (a) A document shredder was introduced into your firm's "DOCUMENTS STORAGE AREA" on December 03, 2016 at 15:44, approximately 4 days prior to the current US FDA inspection.
- (b) After introduction of the document shredder we observed extensive shredding of what appears to be controlled documents and extensive signing of documents by QA. These documents were of a color consistent with batch packaging records and batch manufacturing records, among other documents. Your firm failed to maintain documentation of what had been shredded.
- (c) On December 06, 2016, at we observed that a contract employee with QA removed documents from the shredder and placed them in his pocket.
- (d) On December 07, 2016, at approximately 1:13 (in the middle of the night) individuals were shredding documents. Your firm stated this event represented cleaning staff shredding documents.

1		
i	EMPLOYEE(S) SIGNATURE	DATE ISSUED
SEE REVERSE OF THIS PAGE	Massoud Motamed, Investigator Latorie S. Jones, Investigator	12/16/2016

INSPECTIONAL OBSERVATIONS

PAGE 1 OF 13 PAGES

DEPARTMENT OF HEAL	TH AND HUMAN SERVICES		
ECOD AND DRUG	G ADMINISTRATION		
DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION		
10903 New Hampshire Avenue, Building 51, Room 4225,	12/07/2016-12/16/2016*		
Silver Spring, MD 20993-0002			
Phone: (301) 796-3334. Fax: (301) 847-8738			
Industry Information: www.fda.gov/oc/industry	3008307735		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED			
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice	President Operations		
FIRM NAME	STREET ADDRESS		
Hetero Labs Limited	TSIIC Pharma SEZ		
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED		
Polepally Village, Jadcherla Mandal, Mahaboob Nagar Dis-Oral Solid Dose Drug Product Manufacturer			
trict, Telangana State, 509301, India	6		

(e) Other anomalous events were observed associated with this shredder. Your firm failed to clarify the correlation of introducing the shredder to the "DOCUMENTS STORAGE AREA" prior to the current US FDA inspection.

Your firm's Quality Manager stated that your firm has failed to maintain a log of what documents had been shredded and therefore fulfill their position. Under SOP QA001-11 titled "PREPARATION, REVIEW, APPROVAL, CONTROL AND REVISION OF STANDARD OPERATING PROCEDURE, FORMATS AND DOCUMENT CONTROL", Quality Assurance is responsible for "The storage arrangements must make reasonable provision to prevent loss of or damage to the documents."

- (2) On December 12, 2016, we observed the scrap area behind the production area of Buildings of and to contain controlled documents that had been discarded:
  - (a) A balance printout with drug product "(b)(4) " dated "14-Dec-2016". After discussing this finding with your firm, you failed to explain why the balance printout was post-dated by two days, and therefore indicating an alteration to dates on balances. Your firm's VP of Operations explained that not all balances are password protected.
  - (b) A "GMP REPORT" indicating a test result of "PASS" with a start date "11/12/16". Your firm's Vice President of Corporate Quality Assurance initially purported that these test results represented a "credit card print from the market."
  - (c) A printout indicating an "Abort" event of testing.
  - (d) A plethora of documents with written numbers and signatures.
- (3) On December 07, 2016, we observed controlled documents in shred bins, shredders and trash bins as follows:
- (a) In the trash bin outside Building (b) we observed the trash liner contained various controlled documents, including: original test results from November 26, 2016 at 12:52 and cleanroom certification reports from (b) (4) 2005. We observed the Hetero seal and official signatures as a part of this discarded record.

1		- 1	
	EMPLOYEE(S) SIGNATURE		DATE ISSUED
SEE REVERSE OF THIS PAGE	Massoud Motamed, Investigator  Latorie S. Jones, Investigator		12/16/2016

FORM FDA 483 (09/08) PREVIOUS EDITION OBSOLETE INSPECTIONAL OBSERVATIONS PAGE 2 OF 13 PAGES

DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION			
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampshire Avenue, Building 51, Room 4225,	DATE(S) OF INSPECTION 12/07/2016-12/16/2016*		
Silver Spring, MD 20993-0002  Phone (201) 706 2324 Few (201) 847 8728			
Industry Information: www.fda.gov/oc/industry			
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	Fee: (5.3.4.5) (1.3.4.5)		
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice	e President Operations		
FIRM NAME BY STORY OF THE SECOND STORY OF THE	STREET ADDRESS		
Hetero Labs Limited TSIIC Pharma SEZ			
CITY, STATE, ZIP CODE, COUNTRY  TYPE ESTABLISHMENT INSPECTED			
Polepally Village, Jadcherla Mandal, Mahaboob Nagar District, Telangana State, 509301, India			

- (b) Inside a metal bin intended for shredding in the QA department Building we observed discarded documents including: a signed and reviewed document dated December 07, 2016, in which it appears that the attachments to the document had been physically removed.
- (c) We observed a shredder in the QA portion of Building inside a room termed "DOCUMENTS STORAGE AREA." We observed shreds of documents with the appearance of raw data (written numbers), cleaning logs, and other official documentation. Additionally many of the shreds of paper contained the Hetero seal, and what appeared to be original signatures from both QA and QC.
- (d) After observing the shredder in Building [5] as discussed in sub-point c, we proceeded to the QA "DOCUMENTATION CELL" in Building [6] (From F2062. We observed the door to the shredder was opened without a box for holding shredded documents; however, we noted shreds of paper inside the shredder. We observed several of these shreds of paper to contain what appears to be a QA stamp and green signatures. Your firm stated there is no documentation to indicate what the contents of the shredder are.

Note: Per SOP QA001-11 entitled "PREPARATION, REVIEW, APPROVAL, CONTROL AND RE-VISION OF STANDARD OPERATING PROCEDURE, FORMATS AND DOCUMENT CONTROL" QA signs documents in green.

Finally, we observed bins intended for shredding in the QC portion of your firm. Your firm's QC Manager for [5] stated that QC documents are shredded in QA without a corresponding log or documentation.

## **OBSERVATION 2**

Batch production and control records are not prepared for each batch of drug product produced and do not include complete information relating to the production and control of each batch

Documentation pertaining to exhibit batches submitted to the Agency are incomplete and inaccurate.

I. Data derived from your firm's programmable logic controller (PLC) for compression machines is inconsistent with batch records and validation reports in support of applications to the Agency:

	EMPLOYEE(S) SIGNATURE	DATE ISSUED
SEE REVERSE OF THIS PAGE	Massoud Motamed, Investigator Latorie S. Jones, Investigator	12/16/2016

FORM FDA 483 (09/08) PREVIOUS EDITION OBSOLETE INSPECTIONAL OBSERVATIONS PAGE 3 OF 13 PAGES

DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION				
Silver Spring, MD Phone: (301) 796-3	ione NUMBER hire Avenue, Building 51, Room 4225, 20993-0002 334. Fax: (301) 847-8738		DATE(S) OF INSPECTION 12/07/2016-12/16/2016*  FEI NUMBER 3008307735	American Control of the Control of t
	In: www.fda.gov/oc/industry		5 ( X. ) ( )	
FIRM NAME	ati Reddy Bhaskar Reddy, Vice	STREET ADDRESS	Operations	
Hetero Labs Limite	d INTRY	TSIIC Pharma S		
	adcherla Mandal, Mahaboob Nagar Dis-		Drug Product Mamifacturer	
to what is indic runs under the s	40 and (b) (4) on 06/13/2015. How t a submission to the Agency te	rever, the PLC rmed "(b) (4) was initiated 15 provide docu		" ((b) (4)  full day prior (b) (4)  separate
Furthermore, du investigated.	ring the manufacture of this batch,	a "Position fail	lure" occurred that was n	ot recorded or
(b) Batch record for (b) (4) (b) (4) ) lot (b) (4) states that compression machine PDE-2010 with run between 9:40 and (b) (4) on 02/15/2016. However, the PLC shows (b) (4) records for this same batch used to support a submission to the Agency termed (b) (4) (b) (4) (b) (4) (b) (4) (b) (4) (c) (b) (4) (d) (d) (d) (d) (e) (d) (e) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e				
	ring compression, 6 alarms were ew level (b)", "Production out of range			
(c) Batch record for (b) (4) (b) (4) mg) lot (b) (4) states that compression machine PDE-2010 with a (b) (4) run between (b) (4) and (b) (4) on 05/13/2016. However, the PLC shows (b) (4) records for this same batch used to support a submission to the Agency termed (b) (4) (b) (4) (c) (b) (4) (c) (d) (d) (d) (d) (d) (e) (d) (e) (d) (e) (d) (e) (e) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e				
Furthermore, during compression, an alarm was encountered and not recorded or investigated, including: "Production out of range side [b]".				
Note: The clock for PLC-2010 and clock in the room housing PLC-2010 were precise.				
SEE REVERSE OF THIS PAGE	Massoud Motamed, Investigator Latorie S. Jones, Investigator			12/16/2016
		1		

	DEPARTMENT OF HEAL	<b>TH AND HUMAN</b> G ADMINISTRAT		
Silver Spring, MD Phone: (301) 796-3 Industry Information	tone NUMBER hire Avenue, Building 51, Room 4225, 20993-0002 334, Fax: (301) 847-8738 nr: www.fda.gov/oc/industry	* / * *	DATE(S) OF INSPECTION 12/07/2016-12/16/2016*  FEI NUMBER 3008307735	
NAME AND TITLE OF INDIV	MDUAL TO WHOM REPORT ISSUED ati Reddy Bhaskar Reddy, Vic	e President	Operations	
FIRM NAME Hetero Labs Limite		STREET ADDRESS TSIIC Pharma S		
Po lepally Village,	UNTRY Jadcherla Mandal, Mahaboob Nagar Dis-	TYPE ESTABLISHMEN		
trict, Telangana Sta	ite, 509301, India			
	a — c, we were unable to reconcile it is not apparent that BRs are com			ndicated in the
Of your firm's thermore, (b) of PDE-072, the so	pending (b) (4) (4) (5) (6) (6) (7) (6) (7) (8) (8) (9) (9) (9) (9) (9) (9) (9) (9) (9) (9	for (b) pending	have reviewable alarm l g are conducted onic raw data.	histories. Fur- on equipment
viations pertain	gbook QAR0012/16 (PD) [January ing to production and noted that ap y reflecting low compression yield	proximately 2	3% relate to deviations in	
II. Alarms occu orded or investi	rring during the manufacture of sulgated.	bmission/valid	lation batches are not do	cumented, rec-
PLC. Some of	these alarms pertain to "b (4) compared. However, the BR fails to cap		out of range" and ov	erall (b) startup
pression machin that it is not the	records for the various PLCs note nes during the manufacture of var- e practice of your firm to record the d reviewable should a product failu	ious drug prod nese events. T	lucts. Your firm's mana herefore, manufacturing	agement stated
OBSERVATION Written records the follow-up.	ON 3 of investigation of a drug complain	nt do not includ	le the findings of the inve	estigation and
"One tablet in beer tablets." You	eceived a complaint (MCU16-010 ottle was twice the thickness of all r firm then conducted an investigation	others and it had it it it	g "the possibility to gene	olor as the oth- rate the higher
	igher weight tablets is (b) (4) at the ived form the consumer and your		tage." The sample subjed this weight disparity b	
<u> </u>	EMPLOYEE(S) SKGNATURE			DATE ISSUED
SEE REVERSE OF THIS PAGE	Massoud Motamed, Investigator  Latorie S. Jones, Investigator			12/16/2016
		J.		

	DEPARTMENT OF HEAL FOOD AND DRUG	TH AND HUMAN G ADMINISTRATI		
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampshire Avenue, 1 Silver Spring, MD 20993-0002 Phone: (301) 796-3334. Fax: (30	Building 51, Room 4225,		DATE(S) OF INSPECTION 12/07/2016-12/16/2016*  FEL NUMBER	
Industry Information: www.fda.g	ov/oc/industry	<u> </u>	3008307735	
NAME AND TITLE OF ENDIVIDUAL TO WHOM R TO: Mr. Pabbati Reddy		e President (	Operations	
FIRM NAME Hetero Labs Limited		STREET ADDRESS	Participation of the second	
CITY, STATE, ZIP CODE, COUNTRY		TSIIC Pharma S TYPE ESTABLISHMENT	INSPECTED	
Polepally Village, Jadcherla Man trict, Telangana State, 509301, In		Oral Solid Dose	Drug Product Manufacturer	
		Pitanakan kan kan kais	The Art of the Market Artist	
weight of (b) (4) mg versution).	s a maximum specificat	ion of (b) (4)	mg (approximately 170%	6 of specifica-
Various parameters had be	en altered between (b) (4)		atch subject to the com	
previous batch of the same	product, such as (b) (4)	was <sup>(b) (4)</sup>	from (b) (4) to (b) (4	among
other adjustments.			Physics of the following	
Your firm's investigation to the thickness) by inadverter corrective actions, your firm patients would not receive to	ntly no impact on the pa n failed to remove the d	tient health and	d safety." As a part of pro	eventative and
tablets b mg lot	was provided	d to the US ma	rket.	
(b) Your firm received a constitution (b) (b) (d) (d) mg lot (b) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	) for "dissolution testin ducted an investigation ct to the complaint was ring testing of the comp	g at (1) (4) identifying all (1) received from olaint sample ar	the customer and your find a second retain sample	o specification within spec- irm confirmed e. The investi-
After confirmation of the O	OS, your firm failed to	remove the pro	duct from the market.	
For points a and b: Per your firm's "QUALITY SYSTEM MANUAL" document QM001-04, "Any batch found to be non-compliance to the specifications related to safety, identity, efficacy, purity and quality shall be recalled from the market. Moreover, according to SOP CQA012-01 titled "PRODUCT RECALL" indicates that a recall is to be initiated in the event of "Non-compliance with specifications (e.g. assay, stability, fill/ weight or dissolution)."				
OBSERVATION 4				
The written record or copy unexplained discrepancy is			-	•
EMPLOYEE(S) SIG				DATE ISSUED
	otamed, Investigator ones, Investigator	*		12/16/2016
	~	).		

INSPECTIONAL OBSERVATIONS

FORM FDA 483 (09/08)

PREVIOUS EDITION OBSOLETE

PAGE 6 OF 13 PAGES

DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION			
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampshire Avenue, Building 51, Room 4225,	DATE(S) OF INSPECTION 12/07/2016-12/16/2016*		
Silver Spring, MD 20993-0002 Phone: (301) 796-3334. Fax: (301) 847-8738 Industry Information: www.fda.gov/oc/industry	FEI NUMBER		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED			
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice	President Operations STREET ADDRESS		
Hetero Labs Limited	TSIIC Pharma SEZ		
CITY, STATE, ZIP CODE, COUNTRY Polepally Village, Jadcherla Mandal, Mahaboob Nagar District, Telangana State, 509301, India	Dis- Oral Solid Dose Drug Product Manufacturer		

Consumer complaints are not documented, recorded or investigated.

(I) The following product quality complaints were not investigated, documented or otherwise handled:

Date Received	Product	Batch No.	Complaint Description
12-12-15	(b) (4)	(b) (4)	Lack of drug effect
11-29-15			Lack of drug effect
2-2-16	-	unknown	Product did not work
5-21-16	-	unknown	Medication is not working
9-11-16	-	unknown	Product shape issue
5-11-15	-	unknown	Lack of drug effect
10-31-16	-	unknown	Tablet in stool (Note: not an (b) (4)
i			I

Note: in some cases your firm indicated further follow-up was needed to ascertain the batch numbers of drug product subject to the complaint. Your firm has failed to define the required attempts to contact the patient in cases of product quality issues (SOP PV001-01 only speaks to adverse events).

On 12/13/2016, your firm's Quality Manager and Assistant Manager of QA confirmed that your firm had not investigated and was not aware of the aforementioned complaints,

The complaints were handled by Clinical Development and Medical Affairs (CDMA), a site not registered with the Agency, who neglected the associated product quality aspects of these complaints.

Your firm failed to investigate additional complaints.

Latorie S. Jones, Investigator

**SEE REVERSE** 

**OF THIS PAGE** 

(b) Complaints	are received by (b) (4)	(b) (4)	then provides the respec-
tive complaints	to either/both the pharmacovigilance to	am (CDMA) and Heter	o Unit-V. However, there
was a discrepane	cy between the number of complaints	(strictly product quality)	received by Hetero Unit-
	EMPLOYEE(S) SIGNATURE	7	DATE ISSUED
SEE REVERSE	Massoud Motamed, Investigator		

INSPECTIONAL OBSERVATIONS PAGE 7 OF 13 PAGES FORM FDA 463 (69/06) PREVIOUS EDITION OBSOLETE

12/16/2016

		DEPARTMENT OF				
DISTRICT ADDRESS AND PH				G ADMINISTRATI	ON DATE(S) OF INSPECTION	
10903 New Hampshire Avenue, Building 51, Room 4225, Silver Spring, MD 20993-0002				12/07/2016-12/16/2016*		
Phone: (301) 796-3334. Fax: (301) 847-8738 Industry Information: www.fda.gov/oc/industry NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED				FEI NUMBER 3008307735		
FIRM NAME	ti Reddy	Bhaskar Reddy,	Vic	STREET ADDRESS	Operations	
Hetero Labs Limited	i			TSIIC Pharma S		
,	adcherla Mand	ial, Mahaboob Nagar I iia	Dis-		Drug Product Manufacturer	
V when we inqu presented throug	ired with I hout the ins	letero Unit-V, (b) (4) spection are indicat	ed a	and CDMA.s follows:	A discrepancy in com	plaint numbers
	Source		Nu	mber of Com	plaints Indicated	
	Hetero Ur	nit-V	34			
***	(b) (4)		17	14 9	24 C	
	Hetero CI	OMA	26			
	itensils are r				iate intervals to preven of the drug product.	t contamina-
On December 9, for the manufact		recently clean	ed (b)	(4)	(b) (4) ) were in a cond	ition unsuitable
		are not dedicated t	o a s	pecific drug pro	oduct.	
(a) (b) (4) PDE-30 residue on the di	rug product	contact surface of	the	linir	LEANED" state. We	reside was ob-
served on the used to move drapearance.		surface above the from the (b) (4) to (b)			ionally, the interior of the ded with (b) residue and	
The of the provides an of the	facing the	ontrol of (b) (4) e interior of the (b) (c) ed a reddish-brown	<sup>(4)</sup> ).	Moreover, the	yed (b) (4) residue / acc e line between the (b) (4) istent with rust.	cumulation (the and (b) (4) that
	D. company		\_	11		DATE IOCUES
SEE REVERSE OF THIS PAGE		tamed, Investigator	Q			12/16/2016
NORM FDA 483 (59/ND		S FORTION ORSOLETE	<b>⇔</b>	INSPECTIONAL OBSERV	VATIONS	PAGE 8 OF 13 PAGES

<b>DEPARTMENT OF HEALTH A</b> FOOD AND DRUG ADI				
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampshire Avenue, Building 51, Room 4225, Silver Spring, MD 20993-0002	DATE(S) OF INSPECTION 12/07/2016-12/16/2016*			
Phone: (301) 796-3334, Fax: (301) 847-8738	FEI NUMBER 3008307735	FEI NUMBER 3008307735		
Industry Information: www.fda.gov/oc/industry  NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED				
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice Pr.	sident Operations			
	Pharma SEZ			
	STABLISHMENT INSPECTED Solid Dose Drug Product Manufacturer			
and the second of the second o	7 (1.4 kg)			
This equipment is used to manufacture the (b) (4) for (b) (4) tablets, the (b) (4) for (b) (4) tablets for the LIS market		d the (b) (4) for for		
tablets for the US market.				
(b) (b) (d) PDE-1231: This (b) (d) equipment was above the (b) (d) to the (b) (d) (the drug product contact su (b) (d) displayed an accumulation of a white substance factor (b) (d) surface directly above (b) (d) (and thus drug	ing the interior of the equipmer	above the (b) (4)		
The $^{(b)}$ used for control of $^{(b)}$ to the $^{(b)}$ tercalated in the between the $^{(b)}$ and $^{(b)}$ that provides an with rust. The $^{(b)}$ to this $^{(b)}$ was deteriorated ar	ng the interior of the (b) (4) ). Morplayed a reddish-brown discolor			
This equipment is used to manufacture the (b) (4)	of (b) (4) tablets for the U	S market.		
For points a - b we reviewed SOP ENO29-04 titled '	ROCEDURE FOR TESTING O	<b>)F</b> (b) (4)		
	INSTALLED <sup>(b) (4)</sup>	TEST,		
regards to replacement of the aforementioned (b) (4)	TEST	" is silent with		
	·			
(c) (b) (4) PDE-2095: This (b) (4) equipment was residue build-up with black specs around the torn gas firm's Vice President CQA and Vice President of Operation from cleaning and the black specs were from welding the interior (product contact) of the outlet line to this (b) (b) (4) Tablets for the US market.	tions stated the white residue wang. Furthermore, a (b) (4) residue wang.	ne (b) (4) . Your s an accumula- vas observed in		
The (b) (4) used for control of (b) (4) direct and in a (b) (4) like state. This (b) (4) is used to manufact		Was (b) (4) Tablets.		
ing and (b) (4) coloring were both observed (b) (4) . The operator did not know what caused the discernations stated it was due to a metal reaction. In addition		resident of Op- observed in the		
SEE REVERSE OF THIS PAGE  EMPLOYEE(S) SIGNATURE Massoud Motamed, Investigator Latorie S. Jones, Investigator	R	12/16/2016		

FORM FDA 483 (09/08) PREVIOUS EDITION OBSOLETE INSPECTIONAL OBSERVATIONS PAGE 9 OF 13 PAGES

DEPARTMENT OF HE	LTH AND HUMAN SERVICES				
	JG ADMINISTRATION				
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampshire Avenue, Building 51, Room 4225, Silver Spring, MD 20993-0002	DATE(S) OF INSPECTION 12/07/2016-12/16/2016*				
Phone: (301) 796-3334, Fax: (301) 847-8738	FEI NUMBER				
Industry Information: www.fda.gov/oc/industry NAME AND TITLE OF ORDIVIDUAL TO WHOM REPORT ISSUED	3008307735				
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vi	ce President Operations				
Hetero Labs Limited	TSIIC Pharma SEZ				
Polepally Village, Jadcherla Mandal, Mahaboob Nagar District, Telangana State, 509301, India	Oral Solid Dose Drug Product Manufacturer				
interior siding of the (b)(4) . This (b)(4) is used to manufacture the (b)(4) for (b)(4) and tablets for the US market.  (e) (b)(4) ((b)(4) ) PDE-056: The (b)(4) surface of the equipment was heavily scratched. Document "BREAKDOWN WORK REQUEST NOTE" from February 2016 states (b)(4) touch on the country base." Despite your firm's knowledge of the (b)(4) contacting the country equipment, no assessment into potential metal shavings or associated product impact was conducted. This equipment is used to manufacture the (b)(4) for (b)(4)  Tablets for the US market.  OBSERVATION 6  Deviations from production time limits are not documented.  Excursions in hold time are not investigated, trended or otherwise evaluated for product impact. The fol-					
lowing table contains examples of drug products a  Drug Product	Number of Hold Time Excursions				
(b) (4) (b) (4)	6				
1 ablets g	0				
(b) (4) <b>g</b>	7				
Tablet	S(4) ng 6				
Tablet	3 (4) mg 3				
(b) (4) <b>mg</b>	4				
Your firm's Annual Product Quality Review was silent in regards to manufacturing hold time excursions.  Your firm's Quality Manager qualified this practice by referencing SOP QA058-07, which states "In case during commercial manufacturing if the product exceeds the established hold time period at any					
EMPLOYEE(S) SIGNATURE	DATE ISSUED				
SEE REVERSE OF THIS PAGE Massoud Motamed, Investigator Latorie S. Jones, Investigator	12/16/2016				

INSPECTIONAL OBSERVATIONS PAGE 10 OF 13 PAGES FORM (DA 483 (09/08) PREVIOUS EDITION OBSOLETE

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION DISTRICT ADDRESS AND PHONE NUMBER DATE(8) OF INSPECTION 10903 New Hampshire Avenue, Building 51, Room 4225. 12/07/2016-12/16/2016\* Silver Spring, MD 20993-0002 PET NUMBER Phone: (301) 796-3334, Fax: (301) 847-8738 Industry Information: www.fda.gov/oc/industry 3008307735 NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice President Operations STREET ADDRESS Hetero Labs Limited TSIIC Pharma SEZ CITY, STATE, ZIP CODE, COUNTRY TYPE ESTABLISHMENT INSPECTED Polepally Village, Jadcherla Mandal, Mahaboob Nagar Dis-Oral Solid Dose Drug Product Manufacturer trict, Telangana State, 509301, India stage, sample shall be collected as per SOP No QA023 (for Block or as per SOP OA086 (for block (b) (4) by IPQA person and shall be submitted to QC for re-testing as per SOP No QC018." OBSERVATION 7 The accuracy, sensitivity, specificity and reproducibility of test methods have not been established and documented. (1) For Method Verification Report MVR/16/2023 for determination of Particle Size for (b) (4) On December 09, 2016, we observed 2 files for the Mastersizer 3000 used to commence method verification of particle size for (b) (4) tablets. Specifically, we observed files are termed (b) (4) MSC1600188 (Precision)" and "(b) (4) -MSC1600188 (Precision) 02". We identified that your firm had invalidated two sets of data pertaining to the precision parameter of the (b)(4) method verification. However, your validation report for the corresponding method (MVR/16/2023) failed to reference these events. (2) Analytical methods used to ensure the quality of drug products are not validated prior to their transfer from your firm's validation facility. The table below provides examples of analytical procedures that were transferred to the Quality Control Laboratory prior to completing method validation. In all cases below your firm's Quality Control (QC) unit tested exhibit/submission batches using these non-validated, non-transferred and non-verified analytical test methods. Method Method Method Method Report Report Product **Validation Validation** Transfer Transfer Manufac-Name of the Product Analytical Paramete **Approval** Approved Protocol Report Protocol Report Date Date ture Date Number Number Number AMV/R/11-AMV/P/11-(b) (4) Dissolution by HPLC 8-Aug-11 AMT/10-098 AMT/10-098 27-Jul-10 (b) (4) 132 132 lots (b) (4) mg / (b) (4) mg (b) (4) mg (b) (4) mg (b) mg (4) mg (4) ng Assay & UOD By AMV/P/11-AMV/R/11-8-Aug-11 AMT/10-099 AMT/10-099 27-Jul-10 26-Jul-10 HPLC 133 133 AMV/P/11-AMV/R/11-Related Compounds AMT/10-100 8-Aug-11 AMT/10-100 29-Jul-10 By HPLC 134

FORM FDA 4E3 (09/08) PREVIOUS EDITION OBSOLETE INSPECTIONAL OBSERVATIONS PAGE 11 OF 13 PAGES

DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION				
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampshire Avenue, Bu Iding 51, Room 4225,		DATE(S) OF INSPECTION 12/07/2016-12/16/2016*		
Silver Spring, MD 20993-0002	12/07/2010-12/10/2010			
Phone: (301) 796-3334, Fax: (301) 847-8738		PEI NUMBER		
Industry Information: www.fda.gov/oc/industry		3008307735		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED		\$26 (1985 to 1996)		
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice	e President C	perations		
FIRM NAME	STREET ADDRESS			
Hetero Labs Limited	TSHC Pharma SI	<b>EZ</b>		
CITY, STATE, ZIP CODE, COUNTRY	TYPEESTABLISHMENT	INSPECTED		
Polepally Village, Jadcherla Mandal, Mahaboob Nagar Dis-	Oral Solid Dose	Drug Product Manufacturer		
trict, Telangana State, 509301, India				

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	BA(4) by HPLC	AMV/P/11-	AMV/R/11-	16-Jul-11	AMT/10-097	AMT/10-097	26-Jul-10	<u> </u>
(b) (4) (b) (4) (c) (a) (d) (d) (d) (e) (d) (e) (d) (e) (e) (e) (e) (f) (f) (f) (f) (f) (f) (f) (f) (f) (f	(4) BUOD by	AMV/P/12- 015	AMV/R/12- 015	17-May-12	AMT/P/11-140	AMT/R/11- 140	6-Dec-11	21-Dec-11
	Dissolution by HPLC	AMV/P/12- 016	AMV/R/12- 016	8-May-12	AMT/P/11-141	AMT/R/11- 141	10-Dec-11	
	Assay by HPLC	AMV/P/12- 017	AMV/R/12- 017	15-May-12	AMT/P/11-142	AMT/R/11- 142	6-Dec-11	
	Chromatographic purity by HPLC	AMV/P/12- 018	AMV/R/12- 018	30-May-12	AMT/P/11-143	AMT/R/11- 143	19-Dec-11	
	(b) (4)   GC	AMV/P/12- 019	AMV/R/12- 019	6-Apr-12	AMT/P/11-149	AMT/R/11- 149	23-0ec-11	
(b) (4) (b) (4) SP ablets (b) (b) (b) (b) (c) (d) mg & (d) mg	Dissolution by UV	AMV/P/11- 150	AMV/R/11- 150	20-Sep-11	AMT/P/11-016	AMT/R/11- 016	19-Feb-11	
	BA(4) &UOD By HPLC	AMV/P/11- 171	AMV/R/11- 171	20-Sep-11	AMT/P/11-015	AMT/R/11- 015	19-Feb-11	475-144
	Assay By HPLC	AMV/P/11- 172	AMV/R/11- 172	20-Sep-11	AMT/P/11-017	AMT/R/11- 017	19-Feb-11	17-Feb-11
	Related Compounds By HPLC	AMV/P/11- 203	AMV/R/11- 203	12-Nov-11	AMT/P/11-018	AMT/R/11- 018	19-Feb-11	-

### OBSERVATION 8

Appropriate controls are not exercised over computers or related systems to assure that changes in master production and control records or other records are instituted only by authorized personnel.

Your firm's Empower 3 based high-performance liquid chromatography (HPLC) system had approximately 421 occurrences of a user abort since roughly September 23, 2016. The majority of these aborts are during data acquisition. However, a sub-set of these user abort events demonstrated a time gap between the last injection (analytical testing) and the user abort event, such that the last injection occurred a significant amount of time prior to the user abort event. Your Deputy Manager of QC stated that they have no documentation pertaining to events not captured between the last injection and the Empower system registering the user abort. There is no record of activity in the Empower system after the last injection recorded and prior to the registry of the user abort. Some examples of the time disparities without investigations are presented in the table below:

Date of Event	Time of User Abort	Last Run Time	Injection Run Length	Time Gap	Product
24-09-2016	(b) (4)		40 Min	51 min	(b) (4)

SEE REVERSE OF THIS PAGE EMPLOYEE(S) SIGNATURE Massoud Motamed, Investigator Latorie S. Jones, Investi or



DATE ISSUED 12/16/2016

ORM FDA 483 (09/06)

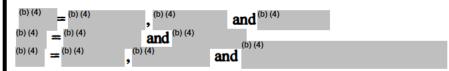
PREVIOUS EDITION OBSOLETE

INSPECTIONAL OBSERVATIONS

PAGE 12 OF 13 PAGES

DEPARTMENT OF HEALTH AND HUMAN SERVICES FOOD AND DRUG ADMINISTRATION				
DISTRICT ADDRESS AND PHONE NUMBER 10903 New Hampsh re Avenue, Bu ld ng 51, Room 4225,	DATE(S) OF INSPECTION 12/07/2016-12/16/2016*			
S lver Spr ng, MD 20993-0002				
Phone: (301) 796-3334, Fax: (301) 847-8738		FEI NUMBER		
Industry Information: www.fda.gov/oc/industry	a in ngrowent y	3008307735		
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED				
TO: Mr. Pabbati Reddy Bhaskar Reddy, Vice	e President (	Operations		
FIRM NAME	STREET ADDRESS	Control of the Contro		
Hetero Labs L m ted	TSIIC Pharma S			
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED			
Polepally V llage, Jadcherla Mandal, Mahaboob Nagar Dis- Oral Solid Dose Drug Product Manufacturer				
trict, Telangana State, 509301, India				

[	b) (4)	[ . ·	· · · · · · · · · · · · · · · · · · ·	(b) (4)
26-09-2016	S) (+)	20 Min	1hr 10 min	(b) (4) Tablets (b) (4)
29-09-2016		10 Min	44 min	(b) (4)
29-09-2016		15 Min	36 min	(b) (4)
29-09-2016		15 Min	36 min	(b) (4)
04-10-2016		45 Min	1hr 40 min	(b) (4)
06-10-2016		35 Min	1hr 24min	(b) Tablets ((b) (4)
06-10-2016		40 Min	1hr 14min	(b) (4) (b) (4)
07-10-2016		15 Min	56 min	(b) (4) Tablets ((b) (4)
24-10-2016		20 Min	2hr 23min	(b) (4) (b) (4)
26-10-2016		30 Min	1hr 3min	(b) (c) (b) (4) (b) (4)
08-11-2016		40 Min	2hr 28min	(b) (4) (b) (4)



# \*DATES OF INSPECTION

12/07/2016 (Wed), 12/08/2016 (Thu), 12/09/2016 (Fri), 12/12/2016 (Mon), 12/13/2016 (Tue), 12/14/2016 (Wed), 12/15/2016 (Thu), 12/16/2016 (Fri)

	EMPLOYEE(S) SIGNATURE	DATE ISSUED
SEE REVERSE OF THIS PAGE	Massoud Motamed, Investigator Latorie S. Jones, Investigator	12/16/2016

PORM FDA 483 (09/08) PREVIOUS EDITION ORSOLETE INSPECTIONAL OBSERVATIONS PAGE 13 OF 13 PAGES