DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
10903 New Hampshire Ave,Bldg 51,Rm 4225 Silver Springs, MD 20993 (301)796-3334 Fax:(301)847-8738	1/15/2018-1/19/2018
	FEI NUMBER 3006644152

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Mr. Rajendra Potabatti, General Manager Production

FIRM NAME	STREET ADDRESS
Indoco Remedies Limited (Plant I)	L - 14 I D C Verna Industrial Road
CITY, STATE, ZIP CODE, COUNTRY Vasco Da Gama, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED 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

Laboratory records do not include complete data derived from all tests, examinations and assay necessary to assure compliance with established specifications and standards. Electronic records are used, but they do not meet requirements to ensure that they are trustworthy, reliable and generally equivalent to paper records.

Specifically,

a) laboratory records for (b) (4) Tablets USP shipped to the U.S. are not always complete in that you do not include copies of original HPLC chromatograms prior to reprocessing data after changing method parameters and peak integration in analytical protocols. Stability Testing Analytical Protocol for (b) (4) Tablets USP (b) (4) mg batch (b) (4) stability study time point 9 months (long-term stability study conditions) indicates changes made to the QNT (Quantification Method) in Chromeleon software for dissolution testing including but not limited to: turning on Valley to Valley peak integration, turning on inhibit integration at RT (Retention Time) (b) (4) and turning off inhibit integration at RT (b) (4) Your Senior Manager Corporate QA stated QC analysts do not process data, QC reviewers (other analysts in the QC laboratory) process data. Your Senior Manager Corporate QA also stated QC reviewers process data and review the chromatograms and then change the inhibit integration times and/or change the integration peak type prior to reprocessing data if a peak is not identified or a peak is not integrated.

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b)you do not have a written procedure(s) describing review of raw electronic data to ensure all data is reported and all data reported is accurate prior to batch approval and release.

c) you do not verify the total number of injections for each test for each batch are the same as the total number of injections reported for each test for each batch to ensure all data is reported and no data is omitted.

OBSERVATION 2

Laboratory controls do not include the establishment of scientifically sound and appropriate test procedures designed to assure that drug products conform to appropriate standards of identity, strength, quality and purity.

Specifically, laboratory test procedures are not always scientifically sound and laboratory test procedures for (b) (4) Tablets USP shipped to the U.S. do not always include sufficient detail to ensure consistent implementation in that Standard Analytical Procedure (b) (4) Tablets, USP (b) (4) mg PSAP/RS (b) (4) /E version 8 effective September 9, 2014 does not include specific details:

a) the aforementioned procedure does not specify to turn on inhibit integration as part of Related Substance testing, however, QC Reviewers turn on inhibit integration prior to processing/reprocessing data thereby blocking identification and quantification of unknown impurities. Chromeleon software print-outs for Related Substance testing of (b) (4) Tablets USP including but not limited to (b) (4) Tablets USP (b) (4) mg batch (b) (4) list inhibit integration turned on prior to testing and inhibit integration times changed prior to reprocessing data. Your Senior Manager Corporate QA stated QC reviewers can change the inhibit integration times prior to processing/reprocessing data.

b) defining the number of times to rinse the cuvette prior to testing and between test samples as part of identification testing by UV-Visible spectrophotometry.

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c) degassing the dissolution media in accordance with USP <711> as part of dissolution testing. Your Senior Manager Corporate QA stated you are not currently degassing the dissolution media but are adding degassing the dissolution media to written test procedures as procedures are revised.

OBSERVATION 3

The written stability program for drug products does not include test intervals based on statistical criteria for each attribute examined to assure valid estimates of stability.

Specifically, stability study time points do not always represent the shelf life of the product in the product's commercial packaging under stability study conditions in that:

a) Stability Testing QC/047 effective January 25, 2017 section 4.5.2 states "The samples shall be loaded within (b) (4) after completion of testing". Your Vice President of Corporate QA stated you establish your initial time point based on the date of completion of product release testing. Your Vice President of Corporate QA also stated if an OOS investigation is initiated the initial time point is set based on the closing date of the OOS investigation.

b) The Stability Study Report, long-term stability study conditions, for (b) (4) Tablets USP (b) (4) mg (b) (4) count batch (b) (4) ackaged October 24, 2015 lists the initial time point as August 26, 2015, time point 6 months as March 23, 2016, time point 9 months as June 23, 2016, time point 12 months as September 26, 2016, time point 18 months as March 10, 2017, and time point 24 months as September 25, 2017. The initial long-term stability study time point listed occurs nearly two months prior to completion of packaging operations and the 24 month time point occurs approximately one month prior to the actual 24 months after completion of packaging operations (October 24, 2017).

OBSERVATION 4

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Reserve samples from representative sample lots or batches of drug products selected by acceptable statistical procedures are not examined visually at least once a year for evidence of deterioration.

Specifically, annual visual examinations of reserve samples are not adequate in that:

a) Standard Operating Procedure for Collection, Storage , Withdrawal, Visual Examination and Destruction of Reference/Retention Samples QA/073 effective June 30, 2017 does not describe or give examples of types of product defects showing evidence of product deterioration to document and quantify as part of annual visual examination of reserve samples.

b) you (b) (4) on reserve samples (b) (4) tablet for visual examination, and (b) (4) (b) (4) of remaining tablets to your reserve samples storage for future visual examinations.

c) the (b) (4) tablet visually examined is placed on a (b) (4) nd examined without the aid of a light or magnifying lens to identify hard to see signs of product deterioration.

QUALITY SYSTEM

OBSERVATION 5

The responsibilities and procedures applicable to the quality control unit are not in writing and fully followed.

Specifically, your quality unit does not always have written procedures describing how to perform their responsibilities and your quality unit does not always ensure written procedures are followed in that:

a) Finished Product Inspection and Sampling Report no. 19 lists (b) (4) Tablets USP (b) (4) mg batch (b) (4) shipped to the U.S. sampled at start of batch (b) (4) at 15:30. The Batch Packaging Record for (b) (4) Tablets USP (b) (4) mg batch section F.10 lists the

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compression start time as (b) (4) at 13:38. QA did not note the delay of about two hours in collecting the beginning compression sample on the Finished Product Inspection and Sampling Report and QA did not investigate the delayed sample collection.

b) Finished Product Inspection and Sampling Report no. 13 lists (b) (4) Tablets USP (b) (4) mg batch (b) (4) quantity to be sampled for analysis about (b) (4) T (tablets) and no. 14 lists quantity to be sampled as retention sample about (b) (4) T. Your Deputy Manager QA stated sample quantities are defined in your Finished Product Sample Quantity list. Finished Product Sample Quantity no. 107 for (b) (4) Tablets USP (b) (4) mg lists the finished product analysis quantity as (b) (4) T and retention sample quantity as (b) (4) T. QA did not correct the quantities to be sampled on the Finished Product Inspection and Sampling Report or explain the discrepancy between the quantity to be sampled and the actual sample quantities.

c) your Deputy Manager QA stated you generate two original CoAs (Certificates of Analysis) for each batch. Testing, Approval or Rejection of Finished Products QC/012 effective June 23, 2017 does not specify to generate two original CoAs. You do not have one authentic CoA for each batch.

d) Operation, Calibration, Cleaning and Maintenance of UV-Visible Spectrophotometer QC/221 effective November 28, 2016 section 6.5 states "Rinse cuvettes after use, first with purified water and then wash with (b) (4) lightly and let it dry". On January 17, 2018 I observed cuvettes QE/263 stored wet.

PRODUCTION SYSTEM

OBSERVATION 6

The batch production and control records are deficient in that they do not include documentation of the accomplishment of each significant step in manufacturing, processing, packing and holding.

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Specifically, batch records do not always contain all relevant data and information in that:

a) you do not verify all tablets and tablet fragments from previous batches are removed from the compression area before the tablet compression area is released for use by IPQA (In-Process QA) in that your Checklist for Manufacturing Line Clearance During Product Changeover in Compression Area does not include inspection of the compression area for tablets and tablet fragments from previous batches.

b) (b) (4) Tablet USP batch packaging records including but not limited to the batch packaging record for (b) (4) Tablets USP (b) (4) mg batch number (b) (4) do not include the date, time, and sample quantity of samples taken during compression to ensure samples are representative of the batch.

PACKAGING AND LABELING SYSTEM

OBSERVATION 7

There is no documentation of the examination and review of labels and labeling for conformity with established specifications.

Specifically, examination and review of labels/labeling for conformity with established specifications is not adequate in that Standard Operating Procedure for Testing of Outer Label PD/027 effective June 10, 2017 does not include specific details describing how to examine and review primary packaging labels and what to examine and review including but not limited to: confirming the product name and product strength printed on the label, label font size, and label font style. Packaging Material Specification for (b) (4) Tablets USP (b) (4) mg tablets does not include specific criteria for specifications including but not limited to: font style, font size, drug product name, drug product dosage, or tablet count.

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FACILITIES AND EQUIPMENT SYSTEM

OBSERVATION 8

Equipment used in the manufacture, processing, packing or holding of drug products is not of appropriate design to facilitate operations for its intended use.

Specifically, the connection between transfer pipes from (b) (4) and compression machines are not always appropriately designed in that the transfer pipe to compression machine T2/224 is smaller in diameter than the compression machine inlet for (b) (4) The pipe goes through a (b) (4) lid which does not fit flush with the compression machine inlet for (b) (4) On January 18, 2018 I observed an open gap between the lid and the compression machine inlet exposing the (b) (4) during transfer and the interior of the compression machine during compression operations.

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