WARNING LETTER

Yino, Inc.

MARCS-CMS 578566 — AUGUST 12, 2019

Delivery Method:

VIA UPS

Product:

Drugs

Recipient:

Mr. Huaijun Yin

Co-Owner

Yino, Inc.

2 Cuiping Erxiang
Yubei Qu Chongqing Shi, 401120
China

Issuing Office:

Center for Drug Evaluation and Research

10903 New Hampshire Avenue
Silver Spring, MD 20993
United States

August 12, 2019

Warning Letter 320-19-35

Dear Mr. Yin:

The U.S. Food and Drug Administration (FDA) inspected your facility, Yino Inc. at 2 Cuiping Erxiang, Yubei District, Chongqing, from March 18 to 22, 2019.

This warning letter summarizes significant deviations from current good manufacturing practice (CGMP) for active pharmaceutical ingredients (API).

Because your methods, facilities, or controls for manufacturing, processing, packing, or holding do not conform to CGMP, your API are adulterated within the meaning of section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act (FD&C Act), 21 U.S.C. 351(a)(2)(B).

We have not received a response to our Form FDA 483 from your firm for corrective actions to the observations identified during the inspection.

During our inspection, our investigator observed specific deviations including, but not limited to, the following.

1. Failure to transfer all quality or regulatory information received from the API manufacturer to your customers.

You re-label active pharmaceutical ingredients (API) manufactured by other manufacturers and distribute the API to other facilities. API distributed by your firm was imported into the United States. For API you re-labeled, you omitted the name and address of the original manufacturer on certificates of analysis (COA) you generated with your company letterhead. For example, you omitted the manufacturer information for **(b)(4)** on the COA for several lots of **(b)(4)** API. **(b)(4)** API is used in injectable-grade drugs supplied to compounding pharmacies and intended for **(b)(4)** treatment.

Regulators and customers rely on COA to provide accurate information about the quality and source of drugs and their components. Omitting information on a COA compromises supply chain accountability and traceability and may put consumers at risk.
See our Guidance for Industry *ICH Q7 Good Manufacturing Practice Guidance for Active Pharmaceutical Ingredients (https://www.fda.gov/downloads/drugs/guidancecomplianceregulatoryinformation/guidances/ucm073497.pdf)* for more information on how API from original manufacturers as well as API re-packagers and re-labelers should be labeled to clearly identify the original API manufacturer as the API moves through the supply chain. The guidance can be found at the following website: https://www.fda.gov/media/71518/download (https://www.fda.gov/media/71518/download).
In response to this letter, provide:

- a written procedure regarding generation of COA, including controls you have implemented to demonstrate that the COA you generate, and issue include the required information about original manufacturers.
- a retrospective review to determine how your failure to provide required information may have affected drug quality.
- any actions you have taken or will take, such as notifying customers, recalling drugs, or invalidating previously issued COA for any drugs still within their labeled retest dates; and a recently issued COA that includes the required information, as well as a batch certificate.

2. Failure to establish, document, and implement an effective system to manage quality.

Your firm failed to establish an adequate quality system and lacks quality oversight on documentation. For example, COA created and issued by your firm for several lots of **(b)(4)** API distributed to the U.S. market lacked a signature and date from an authorized person in the Quality Unit. You included a test parameter and result that was not performed by the original API manufacturer, nor could you provide evidence that you had performed the test. Additionally, your firm lacked written procedures for re-labeling operations, drug release, document retention, and document control.
Failing to establish and implement a robust quality system, including an adequate organizational structure, at your firm compromises the assurance that the released API meet required specifications of quality and purity.
In response to this letter, provide a plan to establish, document, and implement an effective system for managing quality. Include written procedures for CGMP-related activities and the roles of personnel responsible for oversight.
See FDA's guidance document *Quality Systems Approach to Pharmaceutical CGMP Regulations* for help implementing quality systems, and for risk management approaches to meet the requirements of CGMP regulations 21 CFR, parts 210 and 211. The guidance can be found at the following website: https://www.fda.gov/media/71023/download (https://www.fda.gov/media/71023/download).

CGMP Consultant Recommended

Based upon the nature of the deviations we identified at your firm, we strongly recommend engaging a consultant qualified to evaluate your operations to assist your firm in meeting CGMP requirements. Your use of a consultant does not relieve your firm's obligation to comply with CGMP. Your firm's executive management remains responsible for resolving all deficiencies and systemic flaws to ensure ongoing CGMP compliance.

Conclusion

Deviations cited in this letter are not intended as an all-inclusive list. You are responsible for investigating these deviations, for determining the causes, for preventing their recurrence, and for preventing other deviations in all your facilities.

FDA placed your firm on Import Alert 66-40 on August 1, 2019.

Until you correct all deviations completely and we confirm your compliance with CGMP, FDA may withhold approval of any new applications or supplements listing your firm as a drug manufacturer.

Failure to correct these deviations may also result in the FDA continuing to refuse admission of articles manufactured at Yino Inc., 2 Cuiping Erxiang, Yubei District, Chongqing, into the United States under section 801(a)(3) of the FD&C Act, 21 U.S.C. 381(a)(3). Under the same authority, articles may be subject to refusal of admission, in that the methods and controls used in their manufacture do not appear to conform to CGMP within the meaning of section 501(a)(2)(B) of the FD&C Act, 21 U.S.C. 351(a)(2)(B).

After you receive this letter, respond to this office in writing within 15 working days. Specify what you have done since our inspection to correct your deviations and to prevent their recurrence. If you cannot complete corrective actions within 15 working days, state your reasons for delay and your schedule for completion.

Send your electronic reply to CDER-OC-OMQ-Communications@fda.hhs.gov (mailto:CDER-OC-OMQ-Communications@fda.hhs.gov) or mail your reply to:

Cesar E. Matto M.S.

Senior Policy Advisor

U.S. Food and Drug Administration

White Oak Building 51, Room 4359

10903 New Hampshire Avenue

Silver Spring, MD 20993

USA

Please identify your response with FEI 3015238172.

Sincerely,

/S/

Francis Godwin

Director

Office of Manufacturing Quality

Office of Compliance

Center for Drug Evaluation and Research

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