State Institute for Drug Control

Report No: ***sukls256173/2019***

STATEMENT OF NON-COMPLIANCE WITH GMP

Exchange of information between National Competent Authorities (NCAs) of the EEA following the discovery of serious GMP non-compliance at a manufacturer [1]

Part 1

Issued following an inspection in accordance with :
Art. 111(7) of Directive 2001/83/EC as amended

The competent authority of Czechia confirms the following:
The manufacturer: ***MEHTA API Pvt. Ltd.***
Site address: ***Gut No. 546, 571, 519 & 520, Village Kumbhavali, Tarapur, District Palghar, BOISAR, MAHARASHTRA, 401506, India***

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on ***2019-09-11*** , it is considered that **it does not comply with the Good Manufacturing Practice** requirements referred to in

- The principles of GMP for active substances referred to in Article 47 of Directive 2001/83/EC .

[1] *The statement of non-compliance referred to in paragraph 111(7) of Directive 2001/83/EC and 80(7) of Directive 2001/82/EC, as amended, shall also be required for imports coming from third countries into a Member State.*

Part 2

1 NON-COMPLIANT MANUFACTURING OPERATIONS	
Include total and partial manufacturing (including various processes of dividing up, packaging or presentation), batch release and certification, storage and distribution of specified dosage forms unless informed to the contrary;	
1.4	**Other products or manufacturing activity**
	1.4.3 Other: Manufacture of APIs(en)

Manufacture of active substance. Names of substances subject to non-compliant :
ERYTHROMYCIN(en)

3. NON-COMPLIANT MANUFACTURING OPERATIONS - ACTIVE SUBSTANCES	
Active Substance : ERYTHROMYCIN	
3.1	**Manufacture of Active Substance by Chemical Synthesis**
	3.1.2 Manufacture of crude active substance
3.5	**General Finishing Steps**
	3.5.1 Physical processing steps : milling, sifting 3.5.2 Primary Packaging (enclosing / sealing the active substance within a packaging material which is in direct contact with the substance) 3.5.3 Secondary Packaging (placing the sealed primary package within an outer packaging material or container. This also includes any labelling of the material which could be used for identification or traceability (lot numbering) of the active substance)
3.6	**Quality Control Testing**
	3.6.1 Physical / Chemical testing

Clarifying remarks (for public users)

starting from erythromycin thiocyanate

Part 3

1. Nature of non-compliance:
The inspection was carried out in the framework of the EDQM inspection programme on 9 - 11 September 2019. Scope of the inspection was Erythromycin. In total 24 deficiencies were identified by the inspection team, eleven as major and one as regarding compliance with CEP dossier. The observation regarding CEP dossier was related to usage of regenerated solvent (dichloromethane) which is not included form the current dossier version. The major deficiencies were identified in most of the GMP areas with regards to change control, computerised systems, material management traceability, buildings and facilities, clean areas, cleaning validation, suppliers´ qualification, deviations, CAPA, purified water system, CoAs issuance and standards usage. The company had been subjected to 3 previous inspections, these inspections had defined similar issues as were observed during current inspection indicating a lack of QA oversight and inadequate approach with regard to addressing the issues identified during GMP inspection. Based on the number and severity of the major observations, the inspector team concluded that the inspected firm cannot be considered as in compliance as in compliance with EU GMP Part II and that the combination of deficiencies identified constitutes a critical risk of production products which could be harmful to the patient.
Action taken/proposed by the NCA **Requested Variation of the marketing authorisation(s)** This manufacturer should not be authorised in any new/ongoing marketing authorization or variation application. The submission of a variation application for introducing alternative manufacturers of the active ingredient is recommended. **Recall of batches already released** A recall of medicinal products should be evaluated by involved NCAs following the assessment. **Prohibition of supply** Prohibition of supply of Erythromycin is recommended, unless there are no alternative suppliers and there is a risk of shortage. **Suspension or voiding of CEP (action to be taken by EDQM)** Suspension or withdrawal of CEP is recommended.

2019-11-25

Name and signature of the authorised person of the Competent Authority of Czechia

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