U.S. FOOD & DRUG ADMINISTRATION

U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

June 2, 2023

Mr. Nimish Chudgar
Chief Executive Officer & Managing Director
Intas Pharmaceuticals Limited
Plot No. 255, Magnet Corporate Park, Near Sola Bridge, S.G. Highway,
Thaltej, Ahmedabad - 380054, Gujarat 382213, India

Reference: FEI 3004011473

Dear Mr. Chudgar:

The United States Food and Drug Administration (FDA) has reviewed the Form FDA 483 and establishment inspection report (EIR) and your response to the Form FDA 483 pertaining to the inspection conducted at Intas Pharmaceuticals Limited (IPL), FEI 3004011473, at Plot No. 5 To 14, Pharmez, Near Village Matoda, Sarkhej-Bavla National Highway No. 8-A, Taluka, Sanand, India, from November 22 to December 02, 2022.

We have determined from our review of the cited deficiencies that all drugs manufactured at this facility are subject to refusal of admission pursuant to section 801(a)(3) of the Federal Food, Drug, and Cosmetic Act (the FD&C Act) in that the methods used in, or the facilities or controls used for, their manufacture, processing, packing, or holding do not appear to conform to current good manufacturing practice (CGMP) within the meaning of section 501(a)(2)(B) of the FD&C Act.

Your firm is listed under Import Alert 66-40, whereby all future shipments of drugs that originate from your facility may be refused admission into the United States (U.S.) until your firm can demonstrate the drugs manufactured at this site, and intended for the U.S. market, are in compliance with CGMP. We have not included under this import alert the following medically necessary drugs for which there are shortage implications:

Injectable drug products:	**Oral drug products:**
Atropine	Anastrozole
Azacitidine	Allopurinol
Carboplatin (and Paraplatin)	Amitriptyline
Cisplatin	Capecitabine
Cyanocobalamin	Clonazepam
Decitabine	Escitalopram
Dexmedetomidine	Methotrexate Tab
Docetaxel	Quetiapine
Fluorouracil	Spironolactone
Fulvestrant	
Furosemide	
Methotrexate	
Mitomycin	
Oxaliplatin	
Pemetrexed	
Tigecycline	

The drugs on this list will be reconsidered if shortage and medical necessity implications change.

Until then, with regards to all lots of the drugs identified above as excluded from the import alert, we note the following conditions previously communicated to you by FDA's Drug Shortage Staff (DSS), to be followed for the drugs you offer for importation to the U.S. market:

- Batch certification by an independent third-party confirming that the referenced batches meet the quality attributes and have not been associated with data integrity practices or unresolved OOS events.
    - In the event of any out-of-specification (OOS) or unexpected result, a comprehensive investigation must be conducted and documented, and reviewed and approved by an independent third-party. The third-party evaluation of the batches will include special attention to all test results and investigations. The agency will be notified prior to the release of a batch associated with an OOS result. In the event that such batch is still certified, the batch certification must indicate if the batches were involved in an OOS or unexpected result investigation that was reviewed and certified by the independent third-party, and that such review confirmed the OOS or unexpected result had no impact on the quality of the drug product.
- The independent third-party review must include a detailed evaluation of all batch manufacturing records, in-process and finished product test results including the associated electronic data, all deviations, all OOS events, and applicable environmental monitoring records, as well as visual inspection records.
- The retrospective third-party independent batch certification will be completed within 45 days of the batches being released or further distributed by IPL and submitted to the agency by IPL.
- Should the independent third-party find significant concerns with the decision made by IPL regarding any already released batch, such information will be communicated to the Agency within 3 working days through a Field Alert Report (FAR) and directly to DSS for further discussion on appropriate subsequent actions.
- For batches already manufactured, on hold or pending distribution in India or US distribution centers, triplicate testing will be conducted by an independent third-party laboratory.
- IPL will provide to FDA the certificate(s) of analysis (COA's) for the referenced batches to include the original release COA's and the COA's from the triplicate testing performed by the independent laboratory.
- Once an independent third-party registered laboratory is identified, IPL will notify the agency of the status of the qualification and method verification by this independent laboratory and provide the agency a list of all batches to be tested by the independent laboratory. The COA generated by this laboratory will be part of the independent third-party certification package sent to the agency for review within 30 days of testing be completed and certification.
- The firm will retain sufficient samples from batches on hold to allow the Agency to collect samples for full compendial testing. Specifically, for the Agency to be able to

sample batches manufactured in 2022 and are within expiry. Batch retains should allow for the collection of approximately 2x the number of units needed for full testing.

- The firm will immediately inform the DSS of any sterility failures, stability failures, and provide the investigation. The firm will immediately inform DSS of any complaint and any out of specification result associated with referenced batches and file a FAR if necessary.
- The firm will provide stability data to support referenced batches as requested. For batches with expiration dates beyond the approved expiration date you should have additional batches placed on stability to meet those extended dates. The firm will evaluate the need to add additional batches to ongoing stability studies.
- IPL will provide a protocol that will fully describe the scope, impartiality controls, qualifications of third-parties, anticipated review timeframes, and outcomes of the review(s).

If you have questions or concerns regarding this letter, contact Erika V. Butler, Compliance Officer, at CDER-OC-OMQ-Communications@fda.hhs.gov.

Sincerely,

Carmelo R. Rosa -S
Digitally signed by Carmelo R. Rosa -S
Date: 2023.06.02 07:38:27 -04'00'

Carmelo Rosa, Psy.D.
Director, Division of Drug Quality I
Office of Manufacturing Quality
Office of Compliance
Center for Drug Evaluation and Research