DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
ORA OPQO HQ Room # 2032 12420 Parklawn, Rockville, MD 20857 E-mail: ORAPHARMInternational483responses@fda.hhs.gov	06/26/2023-07/04/2023 FEI NUMBER 3005023799

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Mr. Nicolas Tieche, Head of Bulle Site

FIRM NAME	STREET ADDRESS
UCB Farchim SA	Chemin de la Croix-Blanche 10
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Bulle, Fribourg, 1630 Switzerland	Drug Substance and Bulk Drug Product 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 WE OBSERVED:

OBSERVATION 1

Quality unit oversight over quality control operations is deficient, including laboratory and productions electronic systems and data review.

A. During my review of your Empower 3 chromatography software, interrupted sequences were observed, which generated "Data Incomplete" and "Missing Data" chromatographic data. As a result, the interrupted sample injections were not adequately documented to have occurred within your quality control system, and evaluations were not performed to determine whether the interrupted test injections were within specification, if applicable. Additionally, your Quality Unit was not aware that the software has the capability to verify the incomplete data and evaluate whether the sample did run, and if so, view the chromatogram. During my review of electronic test data for HPLC and GC, I observed multiple instances of interrupted injections, which I requested to be verified (brought back), for further evaluation. In addition, test runs appeared to have been manually interrupted via a "user abort" function, which, like "Data Incomplete" and "Data Missing" interruptions, your firm does not document and/or trend. This discrepancy in your firm's ability to review, document, and investigate all electronic data is a gap in your firm's Data Integrity Program.

B. There is no adequate data integrity program in place to include a statistically sound comprehensive review of all electronic data by the Quality Assurance Unit for standalone and network systems, to ensure completeness, consistency, and accuracy of all chromatographic and non-chromatographic electronic data generated by the Quality Control Laboratory. Specifically, per your firm's

	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE *(Print or Type)*	DATE ISSUED
SEE REVERSE OF THIS PAGE		Arsen Karapetyan, Investigator, Dedicated Drug Cadre	07/04/2023

procedure, only a (b)(4) analyst verifies laboratory work, after which the Quality Assurance Unit confirms QC review. No electronic data is reviewed by the Quality Assurance unit, whether batch to batch, or an established time frame.

C. Your Quality Unit lacks adequate control over electronic records generated in support of quality operations. Approximately (b)(4) personnel form QA and QC have the capability to delete data on their desktops, after which the file vanishes from the desktop, not even available for restoration and review in the recycle bin. During the walkthrough of the inspection on 06/27/2023, I observed a QA personnel delete a recently issued manufacturing batch records on their desktop following your firm's procedure, after which the recycle bin continued to be clear, showing no recent deletes. After further review, your firm's IT team was able to determine that name of files deleted are available dating back 6 months, however documents are not able to be restored.

D. The Quality Unit lacks adequate control over issuance of manufacturing batch records which are purported to be controlled by your quality unit under SOP 011207, titled "Edition Des Blank Batch Record", effective date 03/15/2022. Manufacturing batch records issued to the production unit during the inspection did not appear to be adequately controlled, considering that there is no unique identifier on issued documents to prevent additionally copies from being made outside your firm's document control system.

OBSERVATION 2

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

GMP related computerized systems and equipment have not been validated/qualified to demonstrate the suitability of computer hardware and software to perform assigned tasks. For example, your firm appears to have performed Performance Verification for Empower 3 software, however the verification does not evaluate the consistent performance of the software/equipment over a specified period and

operating environment. During my review of your Empower 3 chromatography software, interrupted sequences were observed, which generated "Data Incomplete" and "Missing Data" chromatographic data. Your firm has not demonstrated to fully understand the different types of communication errors and circumstances which may lead to a "Data incomplete" or "Missing Data" chromatography considering the relationship between the Empower application and database server, Empower RDS servers, LAN cables, Empower LAC/Es, and the instruments connected to LAC/Es.

OBSERVATION 3

The accuracy, sensitivity, specificity, and reproducibility of test methods have not been established and documented.

Your firm has not performed analytical method transfers for the following active pharmaceutical ingredients:

- [(b) (4)] with respect to '[(b) (4)] and 'achiral HPLC Assay ([(b) (4)]'.
- [(b) (4)] with respect to Assay by titration ([(b) (4)].

Additionally, standard and sample solution stability has not been established by your firm as part of the HPLC method validation reports and testing operations for [(b) (4)] [(b) (4)]

OBSERVATION 4

Written procedures are lacking which describe in sufficient detail the handling of components.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
ORA OPQO HQ Room # 2032 12420 Parklawn, Rockville, MD 20857 E-mail: ORAPHARMInternational483responses@fda.hhs.gov	06/26/2023-07/04/2023
	FEI NUMBER 3005023799

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Mr. Nicolas Tieche, Head of Bulle Site

FIRM NAME	STREET ADDRESS
UCB Farchim SA	Chemin de la Croix-Blanche 10
CITY, STATE, ZIP CODE, COUNTRY Bulle, Fribourg, 1630 Switzerland	TYPE ESTABLISHMENT INSPECTED Drug Substance and Bulk Drug Product Manufacturer

Procedures applicable to the warehouse facility operations, with respect to material receipt activities are not in writing in your firm's material receipt procedure SOP 001453, titled "Flux de reception" (Reception Flow), effective date. During my walkthrough of your material receipt area on 06/26/2023, I observed (b) (4) placed on (b) (4) bulk large bags for raw material (b) (4) batch # (b) (4) Per your firm's warehouse supervisor, (b) (4) This practice of using (b) (4) to indicate not to perform a specific activity, such as (b) (4) is not written in your firm's material receipt procedure.

	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE *(Print or Type)*	DATE ISSUED
SEE REVERSE OF THIS PAGE	Arsen Karapetyan	Arsen Karapetyan, Investigator, Dedicated Drug Cadre	07/04/2023