DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2037 Rockville, MD 20857 ORAPHARMInternationalresponses@fda.hhs.gov	01/25/2024-02/02/2024 FEI NUMBER 3006895982

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Dr. Jaidev Sanjeev Rajpal, Managing Director & CEO

FIRM NAME	STREET ADDRESS
Jubilant Generics Limited	Village Sikandarpur Bhainswal, Bhagwanpur
CITY, STATE, ZIP CODE, COUNTRY Roorkee, Uttarakhand, 247661, India	TYPE ESTABLISHMENT INSPECTED 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

Written records are not always made of investigations into unexplained discrepancies. Specifically,

As per your cleaning verification protocol (PR-CV-22-0021) you performed only (b) (4) cleaning verification in 2023 for (b) (4) USP. Deviation investigation (PR# 209693) was opened when unknown extraneous peaks were obtained during the (b) (4) cleaning verification residue test of swab samples collected from manufacturing equipment. The following unknown extraneous peaks were obtained from swab samples collected at different locations of the cleaned manufacturing equipment:

Product Name / Batch manufactured before Cleaning	Equipment / Swab Sample Location	Unknown Extraneous Peak HPLC Retention Time
(b) (4) Tablets USP (b) (4) mg /	(b) (4) / Inner surface (b) (4)-3	(b) (4)
Tablets USP (b) (4) mg /	(b) (4) / Gasket (b) (4) (b) (4)-4	
Tablets USP (b) (4) mg /	(b) (4) / (b) (4) of (b) (4) (b) (4) 1, (b) (4) 1, (b) (4)-1	
Tablets USP (b) (4) mg /	(b) (4) surface- (b) (4) 2, (b) (4)-2	

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
	Jeffrey P. Raimondi Tamil Arasu	Jeffrey P. Raimondi, CSO Tamil Arasu, CSO	02/02/2024

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2037 Rockville, MD 20857 ORAPHARMInternationalresponses@fda.hhs.gov	01/25/2024-02/02/2024
	FEI NUMBER 3006895982

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

Dr. Jaidev Sanjeev Rajpal, Managing Director & CEO

FIRM NAME	STREET ADDRESS
Jubilant Generics Limited	Village Sikandarpur Bhainswal, Bhagwanpur
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Roorkee, Uttarakhand, 247661, India	Drug Product Manufacturer

(b) (4)	Tablets USP (b) (4) mg /	(b) (4) / Inner surface of (b) (4) -2, (b) (4) -2	(b) (4)
	Tablets USP (b) (4) mg /	(b) (4) / Inner surface of (b) (4) 6, (b) (4) -6	
	Tablets USP (b) (4) mg /	(b) (4) surface- (b) (4) -3	

Review of the Deviation (PR# 209693) revealed the following deficiencies and/or discrepancies:

A. Your firm did not identify the root cause of the out of specification (OOS) result obtained for (b) (4) residue when HPLC test for the swab sample taken from the (b) (4) surface even after Phase 1 and Phase 2 investigations (PR#212885). The result obtained for (b) (4) residue was (b) (4) ppm against the specification limit of (b) (4) ppm. This swab sample was taken (b) (4) Type B cleaning performed on the equipment (b) (4) the production of (b) (4) Tablets USP (b) (4) mg (Batch# (b) (4) to support the above deviation investigation arising from the extraneous unknown peaks obtained from swab samples taken at various locations on multiple equipment.

B. Your investigation attributed two of the extraneous unknown peaks to (b) (4) and (b) (4) based on LC-MS study, however, your investigation failed to identify a root cause why these drugs were found in the cleaning verification swab samples taken (b) (4) manufacturing of (b) (4) and take appropriate corrective and preventive actions. The remaining extraneous peaks which appeared at (b) (4) and (b) (4) remain unidentified until date. You have distributed these affected lots, (b) (4) and (b) (4) in the US market.

C. The above referenced deviation investigation (PR# 209693) was not mentioned in your (b) (4) cleaning verification report (RR-CV-23-0007, dated 05 October 2023) though the report has a separate "Deviation" section. You wrote under this section, "During execution there is no discrepancy observed. Hence, no deviation has been reported during cleaning verification of

	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
SEE REVERSE OF THIS PAGE	JPR TA	Jeffrey P. Raimondi, CSO Tamil Arasu, CSO	02/02/2024

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2037 Rockville, MD 20857 ORAPHARMInternationalresponses@fda.hhs.gov	01/25/2024-02/02/2024
	FEI NUMBER 3006895982

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Dr. Jaidev Sanjeev Rajpal, Managing Director & CEO	
FIRM NAME Jubilant Generics Limited	STREET ADDRESS Village Sikandarpur Bhainswal, Bhagwanpur
CITY, STATE, ZIP CODE, COUNTRY Roorkee, Uttarakhand, 247661, India	TYPE ESTABLISHMENT INSPECTED Drug Product Manufacturer

[redacted] Tablets USP [redacted] mg." Also, no reference was made to the OOS investigation (PR#212885) for [redacted] residue for swab samples during the deviation investigation arising out of [redacted] cleaning verification. However, you concluded your cleaning verification report by stating "The cleaning procedure is effective, and equipment is safe for further manufacturing of next product."

The failure to identify the root cause of the presence of extraneous unknown peaks at various retention times in the HPLC chromatograms during repeated swab sample analyses on at least two different batches indicates that your cleaning validation and verification is deficient and unreliable. Your impact assessment and CAPA are inadequate. Since January 2022, you have released approximately [redacted] batches of [redacted] Tablets USP to the US market.

OBSERVATION 2

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

A. During the walk-through inspection of your facility, we observed the presence of at least three uncontrolled investigation documents in a locked bin that were placed for shredding. Your SOP QA103, Rev R04, 'Investigation' section 6.3.3 requires, 'Responsible person shall perform the investigation and prepare the investigation report as per format F-QA-0314 in EDMS electronically as per SOP QA116 "Management of Electronic Document Management System (EDMS)" for further review and approval'. However, the investigation documents found in the bin were prepared outside of EDMS and TrackWise with no document control number and traceability. For example, the signed copy of document identified in the destruction bin titled, "Experimental analysis protocol" which was signed on 26DEC2023 could neither be located in the corresponding TrackWise deviation record or EDMS system. No reference was found in the TrackWise for the existence of such document. Also, your log for the shredder does not identify what type of documents are destroyed.

	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
SEE REVERSE OF THIS PAGE	JPR TA	Jeffrey P. Raimondi, CSO Tamil Arasu, CSO	02/02/2024

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2037 Rockville, MD 20857 ORAPHARMInternationalresponses@fda.hhs.gov	01/25/2024-02/02/2024
	FEI NUMBER 3006895982

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

Dr. Jaidev Sanjeev Rajpal, Managing Director & CEO

FIRM NAME	STREET ADDRESS
Jubilant Generics Limited	Village Sikandarpur Bhainswal, Bhagwanpur
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Roorkee, Uttarakhand, 247661, India	Drug Product Manufacturer

B. Entries for the purported swab samples obtained from cleaned equipment during cleaning verification and follow-up investigations were not found in their respective logbooks. For example, swab samples were collected from different locations of (b) (4) (PR/ (b) (4) 003), (b) (4) (PR/ (b) (4) 070), (b) (4) (PR/ (b) (4) 020) and (b) (4) (PR/ (b) (4) 009) to support (b) (4) cleaning verification and during investigation (PR# 209693). However, the logbooks for these equipment did not always show the sample collection activity on the claimed dates.

C. Your QC inward sampling log for swab samples, in addition to sample receiving date, has entries like 'Complies' meant for test results outcome, but it is not attributable to any analyst or reviewer with date. It is not clear if this entry is made after reviewing all the test results and associated investigations. When asked your QC manager as to who made those entries, he stated that he was not sure and he cannot verify as it was not signed or dated by anyone for the test results outcome. In addition, this log is not reviewed by the Quality Unit.

D. LOT/AR Numbers (b) (4) and (b) (4) show (b) (4) samples were collected on 29-Jan-24 for micro testing at 08:14, 08:20, and 08:04, respectively, The Horizontal Laminar Air Flow Usage Record shows these samples were not tested until (b) (4) on the same day. There are no records documenting if these (b) (4) samples were stored in a refrigerator, who they would have been stored by, and who removed them for testing to verify chain-of-custody. Procedure: QC017, Evaluation of (b) (4) Quality, Revision: 32, Effective Date: 09-Dec-2023, states to analyze (b) (4) samples within (b) (4) of sample, and if not possible, to store the samples refrigerated for a maximum (b) (4)

E. Appropriate controls, including the removal/archival of obsolete recipes, are not placed over your Tablet Compression Machine PR/TCP/012 to ensure only current versions of recipes can be selected for use. Recipe: (b) (4) TCP012V02 was approved for use on 07-March-2023 and is the current recipe to be used for (b) (4) USP (b) (4) ng tablets, it's prior (obsolete) version: (b) (4) TCP012V01 was not archived and removed from the Industrial Process Control Computer, until 29-Jan-2024, approximately 10 months later.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
	JPR TA	Jeffrey P. Raimondi, CSO Tamil Arasu, CSO	02/02/2024

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2037 Rockville, MD 20857 ORAPHARMInternationalresponses@fda.hhs.gov	01/25/2024-02/02/2024
	FEI NUMBER 3006895982

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Dr. Jaidev Sanjeev Rajpal, Managing Director & CEO

FIRM NAME	STREET ADDRESS
Jubilant Generics Limited	Village Sikandarpur Bhainswal, Bhagwanpur
CITY, STATE, ZIP CODE, COUNTRY Roorkee, Uttarakhand, 247661, India	TYPE ESTABLISHMENT INSPECTED Drug Product Manufacturer

F. [(b) (4)] sample [(b) (4)]02 was tested for microbiology and results of TNTC/ml on 08-Jan-2024, which is outside the specification of [(b) (4)] CFU/ml. The analyst who recorded the value documented a failed result. However, the reviewer did not verify the real plate but used a zoomed in photograph on the computer and modified the result to [(b) (4)] CFU/ml which is now within the specification limit.

G. One or more of your standalone laboratory instruments do not have adequate control. For example, your analytical balances neither have audit trail capabilities nor measured weights sequentially printed. These balances are used for weighing API and [(b) (4)] drug product for [(b) (4)] [(b) (4)] testing during in-process, release and stability studies. Currently, the [(b) (4)] test does not involve a second person verification during weighing resulting in the lack of adequate control over any potential repeat analysis performed during this test.

OBSERVATION 3
Time limits are not established when appropriate for the completion of each production phase to assure the quality of the drug product. Specifically,

Specifically, the current hold time studies conducted for [(b) (4)] and compressed tablets of [(b) (4)] Tablets USP [(b) (4)] mg, [(b) (4)] mg, [(b) (4)] mg, [(b) (4)] mg and [(b) (4)] mg do not represent the commercial batch sizes of the product. The hold time study conducted in 2008 to support the [(b) (4)] used a [(b) (4)] quantity of [(b) (4)] kg and approximately [(b) (4)] compressed tablets from the exhibit batches while the commercial batch size is [(b) (4)] Kg and [(b) (4)] Tablets.

OBSERVATION 4
Control procedures are not established which validate the performance of those manufacturing processes that may be responsible for causing variability in the characteristics of in-process material and the drug product. Specifically,

Thickness and hardness specifications for [(b) (4)] USP [(b) (4)] mg were changed based on a challenge study performed under Protocol: PR-Misc-22-0098. At the conclusion of the study, the

	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
SEE REVERSE OF THIS PAGE	JPR TA	Jeffrey P. Raimondi, CSO Tamil Arasu, CSO	02/02/2024

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
12420 Parklawn Drive, Room 2037 Rockville, MD 20857 ORAPHARMInternationalresponses@fda.hhs.gov	01/25/2024-02/02/2024
	FEI NUMBER 3006895982

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED	
Dr. Jaidev Sanjeev Rajpal, Managing Director & CEO	
FIRM NAME Jubilant Generics Limited	STREET ADDRESS Village Sikandarpur Bhainswal, Bhagwanpur
CITY, STATE, ZIP CODE, COUNTRY Roorkee, Uttarakhand, 247661, India	TYPE ESTABLISHMENT INSPECTED Drug Product Manufacturer

specifications were changed from [(b) (4)]mm and [(b) (4)]kp to [(b) (4)]mm and [(b) (4)]kp, for thickness and hardness, respectively. Review of this challenge study revealed the following:

A. The challenge was only performed on the [(b) (4)]mg tablet strength due to the availability of its [(b) (4)] A challenge was not performed on [(b) (4)]mg strengths for evaluation.

B. The minimum amount of tablets needed for the study is not representative of a commercial batch. Four trials were performed [(b) (4)]of the single batch to account for "low-low hardness", "low hardness", "high hardness", and "high-high hardness" values. Each of these trials only evaluated approximately [(b) (4)] tablets, while the commercial batch size is approximately [(b) (4)]tablets.

C. The effectiveness check of the hardness and thickness specification change only evaluated six batches: 1 batch at [(b) (4)]mg, 4 batches at [(b) (4)]mg, and 1 batch at [(b) (4)]mg. No evaluation was performed for [(b) (4)]mg and [(b) (4)]mg batch strengths.

	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (Print or Type)	DATE ISSUED
SEE REVERSE OF THIS PAGE	Jeffrey P. Raimondi Tamil Arasu	Jeffrey P. Raimondi, CSO Tamil Arasu, CSO	02/02/2024