U.S. FOOD & DRUG ADMINISTRATION

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

Via UPS
Return Receipt Requested

May 16, 2024

Dr. Satyanarayana Chava
Chief Executive Officer
Laurus Labs
2nd Floor, Serene Chambers, Road No 7, Banjarahills
Hyderabad, Telangana 500 034
India

Dear Dr. Chava:

The U.S. Food and Drug Administration (FDA) inspected your drug manufacturing facility, Laurus Synthesis Private Limited, FEI 3011524794, at Plot No. 74B, Jawarharlal Nehru Pharma City, Parawada, Anakapalli Andhra Pradesh, from December 4 to 12, 2023.

This untitled letter summarizes 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 APIs 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 reviewed your January 4, 2024 response to our Form FDA 483 in detail.

During our inspection, our investigators observed specific deviations including, but not limited to, the following:

1. Failure of your quality unit to ensure that critical deviations are investigated and resolved.

Your quality unit (QU) failed to perform adequate investigations to identify root causes or implement corrective action and preventive action (CAPA). For example, during a hold time study for intermediate (b) (4), the (b) (4) timepoint result was out-of-specification (OOS) for assay and an unspecified impurity. Your investigation concluded that this was an isolated case with no further root cause investigation or implementation of CAPA.

You also failed to thoroughly investigate an OOS result with your (b) (4) water system. After a total organic carbon OOS result, you resampled your (b) (4) water system and, after receiving a

passing result, did not investigate the original OOS result or implement sampling process improvements to prevent future contamination.

Additionally, you failed to adequately investigate product impact from damage to (b) (4) (b) (4) . Your investigation only included a small-scale solubility experiment to conclude that drug substance intermediate batches manufactured in the (b) (4) were not contaminated with (b) (4) . Your corrective action, that filtration during subsequent processing by your customer would remove any potential (b) (4) contamination, was inadequate because you did not inform your customer about the potential contamination or request they filter for (b) (4) particulates.

In your response, you provided procedural improvements and a degradation study identifying the unspecified impurity from the hold time study. You also reiterated you would not inform your customers of potential (b) (4) contamination. Your response is inadequate. You did not address the inadequacy of your investigations or provide any actions to improve root cause determination, CAPA implementation, or monitoring of CAPA effectiveness. You also did not commit to providing customers with quality related information about batches you release, such as the potential for (b) (4) contamination.

Inadequate investigations, unidentified root causes, and ineffective CAPA can result in recurring problems that compromise your ability to manufacture safe and effective drugs.

2. Failure to clean equipment and utensils to prevent contamination or carry-over of a material that would alter the quality of the API beyond the official or other established specifications.

You failed to adequately clean your manufacturing equipment. For example, our investigators observed a (b) (4) that was recorded in your preventative maintenance report to be in a clean state three days before the inspection. However, our investigators observed apparent dirt and dark residue on the (b) (4) .

In response, you state you trained engineering personnel on the (b) (4) preventative maintenance procedure and inspected all (b) (4) on-site. Your response is inadequate because you did not address the discrepancy between the preventative maintenance report indicating manufacturing equipment was in a clean state, and the observed dirt and residue. You also did not address whether you would assess other manufacturing equipment and their maintenance records.

CGMP manufacturing replies on accurate, reliable records. You must ensure the accuracy and integrity of data to support the safety, effectiveness, and quality of the drugs you manufacture.

CGMP Consultant Recommended

Based upon the nature of the deviations we identified at your firm, you should engage a consultant qualified as set forth in 21 CFR 211.34 to evaluate your operations to assist your firm in meeting CGMP requirements. The qualified consultant should also perform a comprehensive six-system audit of your entire operation for CGMP compliance and evaluate the completion and efficacy of your corrective actions and preventive actions before you pursue resolution of your

firm's compliance status with FDA. 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

The deviations cited in this letter are not intended to be an all-inclusive list of deviations that exist at your facility. You are responsible for investigating and determining the causes of any deviations and for preventing their recurrence or the occurrence of other deviations.

This letter notifies you of our findings and provides you an opportunity to address the above deficiencies. After you receive this letter, respond to this office in writing within 30 working days.[1] Specify what you have done to address any deviations and to prevent their recurrence. In response to this letter, you may provide additional information for our consideration as we continue to assess your activities and practices. If you cannot complete corrective actions within 30 working days, state your reasons for delay and your schedule for completion.

Send your electronic reply to CDER-OC-OMQ-Communications@fda.hhs.gov. Identify your response with FEI 3011524794 and ATTN: Christina Capacci-Daniel.

Sincerely,

/s/

Francis Godwin
Director
Office of Manufacturing Quality
Office of Compliance
Center for Drug Evaluation and Research

cc: U.S. Agent
Mr. Sharath Koripally
Laurus Generics Inc.
400 Connell Dr Ste 5200
Berkeley Heights, NJ 07922-2807

[1] Under program enhancements for the Generic Drug User Fee Amendments (GDUFA) reauthorization for fiscal years (FYs) 2023-2027, also known as the GDUFA III Commitment Letter, your facility may be eligible for a Post-Warning Letter Meeting to obtain preliminary feedback from FDA on the adequacy and completeness of your corrective action plans.