

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug 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

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

Specifically,

- A. The following commercial drug products test methods, including in-house and compendial test methods, were not validated, verified or transferred appropriately. These drug products have approved (b) (4) and drug product batches were distributed to customers in the US and are currently in the market. In addition, test methods for numerous approved (b) (4) products but not yet commercial were also not appropriately validated/verified/transferred.

Drug Product	(b) (4) #	Test Description	USP / Inhouse	STP#
(b) (4)				

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	<small>Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00</small> X	DATE ISSUED 6/21/2024
---------------------------------	--	--	--------------------------

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER

12420 Parklawn Drive, Room 2032
Rockville, MD 20857

DATE(S) OF INSPECTION

6/10/2024-6/21/2024*

FEI NUMBER

3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME

Cipla Limited

STREET ADDRESS

L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area

CITY, STATE, ZIP CODE, COUNTRY

Verna, Salcette, Goa, 403722 India

TYPE ESTABLISHMENT INSPECTED

Drug Manufacturer



SEE REVERSE OF THIS PAGE

EMPLOYEE(S) SIGNATURE

Tamil Arasu, Investigator - Dedicated Drug Cadre
Eileen A Liu, Investigator - Dedicated Drug Cadre
Joseph A Piechocki, Investigator

Tamil Arasu
Investigator - Dedicated Drug Cadre
Signed By: 2001563486
Date Signed: 06-21-2024
16:30:00

X

DATE ISSUED

6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---



(b) (4)

B. The following active pharmaceutical ingredients (API) test methods, including in-house and compendial test methods, were not validated or verified appropriately.

API	DMF #	Test Description	USP / Inhouse	STP#
-----	-------	------------------	------------------	------



(b) (4)

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00 X _____	DATE ISSUED 6/21/2024
---------------------------------	--	---	--------------------------

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---



SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	<small>Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00</small> <hr/> X	DATE ISSUED 6/21/2024

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER

12420 Parklawn Drive, Room 2032
Rockville, MD 20857

DATE(S) OF INSPECTION

6/10/2024-6/21/2024*

FEI NUMBER

3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME

Cipla Limited

STREET ADDRESS

L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area

CITY, STATE, ZIP CODE, COUNTRY

Verna, Salcette, Goa, 403722 India

TYPE ESTABLISHMENT INSPECTED

Drug Manufacturer

(b) (4)

**SEE REVERSE
OF THIS PAGE**

EMPLOYEE(S) SIGNATURE

Tamil Arasu, Investigator - Dedicated Drug
Cadre
Eileen A Liu, Investigator - Dedicated Drug
Cadre
Joseph A Piechocki, Investigator

Tamil Arasu
Investigator - Dedicated Drug
Cadre
Signed By: 2001563486
Date Signed: 06-21-2024
16:30:00

X

DATE ISSUED

6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---



SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	<small>Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00</small> X _____	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

C. The following in-process test methods, including in-house and compendial test methods, were not validated or verified appropriately.

Drug Product	Test Description	USP /	STP#
(b) (4)			

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	<small>Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00</small> X _____	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---



As per the firm's SOP 1035-L-0016 Validation and Verification of Analytical Test Methods, all the above tests must be validated or verified.

OBSERVATION 2

Aseptic processing areas are deficient regarding the system for monitoring environmental conditions.

Specifically,

Unit (b)(4) Line (b)(4) approved to manufacture sterile (b)(4) products for the U.S. During the inspection, I (EL) found the viable surface monitoring conducted in (b)(4) Line (b)(4) (b)(4) do not always ensure microbial contamination in the critical Grade A areas will be recognized.

On 06/10/2024, I (EL) observed the EM sampling of batch (b)(4) mg (b)(4) ml conducted in (b)(4) Line (b)(4) for the Iran market. (b)(4) manufacturing process and EM procedures are identical to the (b)(4) products (b)(4) for the U.S. market. I (EL) observed the followings:

1. (b)(4) viable surface monitoring are conducted at random. There is no

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	<small>Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00</small> X _____	DATE ISSUED 6/21/2024
---------------------------------	--	--	--------------------------

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857		DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
		FEI NUMBER 3004081307
NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED Pankaj Vijay Shitole, Senior Director & Site Head		
FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area	
CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer	

systematic sampling plan to ensure uniform and representative coverage of all accessible (b)(4). For examples, from 11/2022 to 04/2024, Line (b)(4) #13 was sampled only once for a total of (b)(4) batches manufactured. From 11/23/2022 to 02/26/2023, Line (b)(4) # (b)(4) were each sampled once for a total of (b)(4) batches manufactured. Additionally, from 11/21/2023 to 06/01/2024, Line (b)(4) #54 was sampled only twice for a total of (b)(4) batches manufactured.

- The (b)(4) swabs are used to conduct Grade A viable surface monitoring in the (b)(4) Line (b)(4). The firm assigns (b)(4) swab samples when no growth was observed after incubation to have “<(b)(4) cfu detected”. However, no limit of detection was established during validation. During the (b)(4) swab validation, (b)(4) cfu to (b)(4) cfu of test microorganisms were inoculated to challenge recoveries. A vendor’s validation for (b)(4) swabs recovery per change control 1035-D-19-00132 showed no growth was obtained after inoculating with (b)(4) surfaces with (b)(4) cfu and (b)(4) cfu S. aureus. The validation failed to assure swab sample with no growth after incubation truly has <(b)(4) cfu, which is the Grade A action limit. There have been no Grade A excursions observed post implementation of the (b)(4) swabs during the review period from 09/30/2022 to 06/18/2024.
- The (b)(4) swab validation failed to include testing of the Grade A (b)(4) flexible pipes (b)(4) surfaces and the Grade A (b)(4) formation (b)(4) surfaces.
- Monitoring procedure UQCP 158 “Environmental Monitoring in (b)(4) Facility” lacks sufficient details describing how to swab (b)(4) or flexible pipes to ensure consistent and maximum coverage of the Grade A surfaces. Additionally, monitoring SOP 1035-L-0086 “Microbiological Environment Monitoring of Air, Surfaces and Personnel” instructs operators to swab appropriate size i.e., (b)(4) wherever applicable or as per the technician’s discretion. SOP 1035-L-0086 fails to provide sufficient details for how to swab (b)(4) or to

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00 X	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

cover maximum areas for the Grade A surfaces. On 06/10/2024, I (EL) observed Grade A swabbing after (b)(4) batch (b)(4). Specifically, I (EL) observed the operators either did not follow procedure or swabbing at their discretions due to SOPs lacking sufficient details.

- NVPC (non-viable particle count) for the Grade A (b)(4) formation areas are conducted under only static condition (b)(4) batch. No NVPC was monitored during active filling under dynamic condition to ensure NVPC is within the acceptable Grade A specification. On 06/10/2024, I (EL) observed a layer of white particles on the assembly top in the Grade A (b)(4) formation areas after completion of batch (b)(4). The firm lacks assurance that the Grade A NVPC did not exceed specified limits during active filling.

OBSERVATION 3

Aseptic processing areas are deficient regarding the system for cleaning and disinfecting the room and equipment to produce aseptic conditions.

Specifically,

During the inspection, I (EL) reviewed Unit (b)(4) Line (b)(4) CCTV recording of post fill cleaning activities performed on 06/07/2024 for (b)(4) ml (b)(4) ml batch (b)(4). The cleaning activities were in preparation for the filling of the subsequent batch (b)(4). I (EL) observed the following:

- Spraying with the scheduled disinfectant is intended for area decontamination of places the operators cannot reach. The observed spraying process has not been qualified to demonstrate it is effective for intended use. Failure to qualify a spraying process for disinfection of aseptic manufacturing areas is a repeat observation from the August 2022 FDA 483.

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00 X	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

- Operators were observed climbing and walking inside the Grade A (b)(4) formation areas to perform cleaning activities. Operators did not thoroughly sanitize or disinfect the previously traversed machine bed areas as they backed out of the (b)(4) formation machine. Machine cleaning procedure SOP CT-413 "Cleaning of (b)(4) Machine" lacks requirement and details for how to clean the Grade A (b)(4) formation interior machine bed after performing sanitizing/disinfection activities.
- Operators did not always follow SOP CT-413 "Cleaning of (b)(4) Machine" in applying the appropriate cleaning technique. Specifically I (EL) observed the (b)(4) (b)(4) technique was not followed while cleaning the Grade A (b)(4) formation areas. I (EL) observed operators using one-fold side of the wipe to cover multiple cleaning strokes.

OBSERVATION 4

There is a failure to thoroughly review the failure of a batch or any of its components to meet any of its specifications whether or not the batch has been already distributed.

Specifically,

- The Unit (b)(4) Line (b)(4) is approved for (b)(4) mcg (b)(4) ml and (b)(4) mg (b)(4) ml (b)(4) solution.

DEV-1003-2023-00049 investigation is deficient for MF (media fill) failure for Batch (b)(4) executed in Unit (b)(4) Line (b)(4) ated 05/2024. Specifically,

Two turbid (b)(4) units (container) were observed at the end of MF (b)(4) incubation. Damage to the surface of each (b)(4) during transport to the incubator was identified as the

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	<small>Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00</small> <input checked="" type="checkbox"/>	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

probable root cause. (b) (4) used for transport were examined and all were found acceptable. The two turbid units were tested and rejected by the firm's pinhole inspection machine indicating the presence of moisture or leakage. However, the pinhole inspection test method was not validated for the examination of the above turbid units. The two turbid units were sent to an external laboratory for CT scan. The laboratory report was inconclusive and no one at the firm could understand the CT scan report. However, without scientific and conclusive evidence, the investigation determined that the observed microbial contamination was due to damages done to the (b) (4) surfaces during transport of the MF units. The above investigation was inadequate in that you failed to provide conclusive evidence that the observed microbial contamination was the result of damaged and leaking containers and was not the result of failures in the aseptic filling process.

2. QMS# 408214 (36M Stability Assay, Product: (b) (4) Tablets (b) (4) mg, Batch# (b) (4))

Long term stability at 36M (25°C / 60% RH) gave an OOS value of (b) (4) % for assay. Your firm attributed the most probable cause for the lower content due to the usage of (b) (4) compartment of the Sonicator. However, your analysts always used this (b) (4) compartment for routine sample preparation.

During the additional tests after completing hypothesis tests, analysts collected (b) (4) tablets after (b) (4) (b) (4) for the official assay test unlike the routine assay test sample preparation. Since the failure of this batch at 36M, you have not shown any passing stability beyond 12M.

OBSERVATION 5

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

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00 X	DATE ISSUED 6/21/2024
---------------------------------	--	---	--------------------------

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

Specifically,

A) User privileges assigned within the manufacturing equipment used for products intended for the US market are not appropriate for the job functions being performed nor are they adequately defined. For example,

1. The software PC VISUAL for (b) (4) machine (b) (4) 491 has the three privilege groups "Operator", "Supervisor", and "Admin" defined. Quality Assurance personnel are assigned "Admin" privileges within the system, which includes all the abilities of the operator and supervisor roles for operating the equipment, and additionally includes the ability to perform additional functions, including but not limited to modifying the date and time, creating and modifying users, and deleting batches.
2. According to the equipment privilege details document where the user privileges are defined for Factory Talk View Studio for (b) (4) 043, the user groups established within the system are "Operator", "Supervisor", "Admin", and "Maintenance". However, upon further review of the audit trail related to the system and the user role review documentation, additional groups including "Default", "Administrators", and "Engineer" were identified and not defined within the user privilege document. Furthermore, quality assurance personnel are assigned administrative privileges within the system, which includes operator and supervisor abilities and additional privileges to change system security and machine settings.

B) User access for equipment used in the manufacturing of drug products intended for the US market is not adequately reviewed to ensure proper and approved access to the system is maintained. For example,

1. The software Factory Talk View Studio used for (b) (4) 043 allows the assignment of more than one privilege within the system. During review of the user access to the system, I

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00 X	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

(JAP) observed a quality assurance user having separate “Admin” and “Administrators” privileges within the system. There is no review requirement to ensure that each user is only assigned one user privilege related to their job function.

- During the review of users within the software PC VISUAL for (b)(4) equipment (b)(4) 491, I (JAP) observed a quality assurance user having two administrator user accounts which were interchangeably used within the system. There is no review requirement to ensure that each user is assigned only one login account per system.

OBSERVATION 6

The responsibilities and procedures applicable to the quality control unit are not fully followed.

Specifically,

The following procedures were not fully followed:

- Procedure 1035-L-0117, “Formats for Lab Operation”, allows for the issuance of guidance for awareness for use in analytical testing when critical analytical steps are to be taken during analysis. Simultaneously, specification requests should be initiated and change and specification numbers to be referenced. A guidance for awareness was issued for the purity and related substances testing of (b)(4) drug substance, which is used in the manufacture of (b)(4) drug products, at incoming release testing to run the reference standard, blank, and (b)(4) injections following the (b)(4) program instead of the (b)(4) program. No change control or action item specific to the drug substance intended for use in manufacturing of US marketed products was initiated as required per procedure, and no assessment was documented to ensure no regulatory impact for this

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:00 X	DATE ISSUED 6/21/2024

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION**

DISTRICT ADDRESS AND PHONE NUMBER 12420 Parklawn Drive, Room 2032 Rockville, MD 20857	DATE(S) OF INSPECTION 6/10/2024-6/21/2024*
	FEI NUMBER 3004081307

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED
Pankaj Vijay Shitole, Senior Director & Site Head

FIRM NAME Cipla Limited	STREET ADDRESS L139 to L146, S-103 to S-105, S-107 to S-112, L147 to L-147/1/2/3, L-147/A, L-138, L-150, S-116, Verna Industrial Area
----------------------------	--

CITY, STATE, ZIP CODE, COUNTRY Verna, Salcette, Goa, 403722 India	TYPE ESTABLISHMENT INSPECTED Drug Manufacturer
--	---

change in the method.

- Procedure STP-15, "Account of Stock Transfer (Plant to Plant in Same Location)", requires the completion of form STP-15/F1/3 when material is transferred between units to ensure that the material received from the sending unit has been tested per specification, all results are satisfactory, and tests are performed per the US market requirement. From January 2023 – February 2024, approximately (b)(4) materials were transferred to Unit (b)(4) without completing this form and verifying the above requirements.
- Procedure MT-766, "Handling of Nomenclature of (b)(4) in Machine", requires the creation, modification, or deletion of (b)(4) within manufacturing equipment to be verified by quality assurance, and the (b)(4) and verification information are entered within the equipment specific logbook. During the review of the list of (b)(4) created, modified, and deleted from October 2023 to May 2024, two instances were identified where the (b)(4) information was not input into the logbook nor was a quality review of the (b)(4) performed.

***DATES OF INSPECTION**

6/10/2024(Mon), 6/11/2024(Tue), 6/12/2024(Wed), 6/13/2024(Thu), 6/14/2024(Fri), 6/17/2024(Mon), 6/18/2024(Tue), 6/19/2024(Wed), 6/20/2024(Thu), 6/21/2024(Fri)

X Joseph A Piechocki
Investigator
Signed By: Joseph A. Piechocki Jr -S
Date Signed: 06-21-2024 16:27:01

X Eileen A Liu
Investigator - Dedicated Drug Cadre
Signed By: 2000427259
Date Signed: 06-21-2024 16:27:59

SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE Tamil Arasu, Investigator - Dedicated Drug Cadre Eileen A Liu, Investigator - Dedicated Drug Cadre Joseph A Piechocki, Investigator	Tamil Arasu Investigator - Dedicated Drug Cadre Signed By: 2001563486 Date Signed: 06-21-2024 16:30:09 X	DATE ISSUED 6/21/2024
---------------------------------	--	--	--------------------------