DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA/CBER/OCBQ/DMPQ 10903 New Hampshire Avenue, Silver Spring, MD 20993 Attention: Carolyn Renshaw, Building 71 Room 4042 Telephone: 240.402.7343 Industry Information: www.fda.gov/oc/industry	01/16/2023 to 01/20/2023
	FEI NUMBER 3012144557

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Shawn Kinney, CEO

FIRM NAME	STREET ADDRESS
Berkshire Sterile Manufacturing (BSM)	480 Pleasant Street
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Lee, MA 01238	Excipient Gel 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 (I) (WE) OBSERVED:

1. Written procedures lack sufficient detail describing the handling of deviations. Specifically,

a) SOP-QA-011, Deviation and Event Reporting Procedure, states that deviations are to be closed within 30 calendar days and extensions granted by Quality Assurance (QA) only under special circumstances (e.g., a justifiable need for extra investigations), for an additional 20 days. SOP-QA-011 does not specify a maximum allowable number of extensions that can be granted by QA, for any reported deviation.

b) Extensions were granted by QA without reasonable justification. Specifically, the deviation reported in report DEV-2021-0071 was resolved in the same report, yet QA extended this deviation three times under extension numbers EXT-00258, EXT-00304 and EXT-00359.

2. The responsibilities and procedures applicable to raw material management are not fully followed. Specifically,

a) Section 4.6 of SOP-QA-016 "Quality Agreement between Berkshire Sterile Manufacturing, Inc. (BSM) and Krystal Biotech, Inc." specifies that BSM is responsible to (b) (4). Currently, the (b) (4) are provided directly by Krystal, which is contrary to SOP-QA-016. Documents specifying responsibility and associated SOPs for this arrangement are not fully established.

b) SOP-QA-010 "Supplier Management Program" specifies that only qualified suppliers are used in the manufacturing and testing of cGMP products. However, the current primary packaging glass vial supplier (b) (4) and the Methocel HPMC supplier (b) (4) have not been qualified by (b) (4).

3. Cleaning procedures are not established. Specifically,

SEE REVERSE OF THIS PAGE	/S/	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
		Obinna Echeozo, Lead Inspector/Microbiologist Jie He, Consumer Safety Officer Carl Perez, Consumer Safety Officer	01/20/2023

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT OFFICE ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
FDA/CBER/OCBQ/DMPQ 10903 New Hampshire Avenue, Silver Spring, MD 20993 Attention: Carolyn Renshaw, Building 71 Room 4042 Telephone: 240.402.7343 Industry Information: www.fda.gov/oc/industry	01/16/2023 to 01/20/2023
	FEI NUMBER 3012144557

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT IS ISSUED

TO: Shawn Kinney, CEO

FIRM NAME	STREET ADDRESS
Berkshire Sterile Manufacturing (BSM)	480 Pleasant Street
CITY, STATE AND ZIP CODE	TYPE OF ESTABLISHMENT INSPECTED
Lee, MA 01238	Excipient Gel Manufacturer

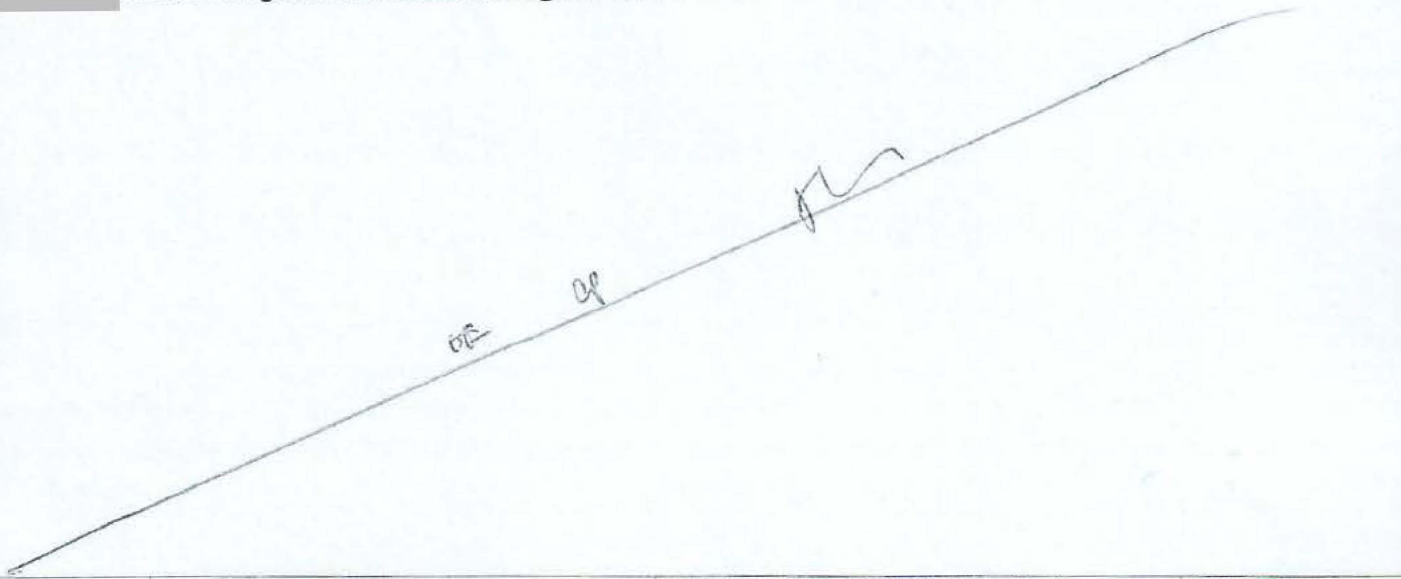
a) Removal of product or cleaning agent from the (b) (4) after (b) (4) has not been validated or verified, and protocols do not state the requirements for bioburden and TOC limits post cleaning.

b) Cleaning procedures do not exist to provide sufficient instructions for the methods and materials used in the (b) (4) cleaning of major equipment (e.g., (b) (4)).

4. Adequate contamination control during the manufacture of drug product is not used when appropriate. Specifically, there was no point of use sterile (b) (4) for the product contact (b) (4) in Room (b) (4) (filling room) during the drug product fill on January 18, 2023.

5. The shipping validation of the final excipient gel product from BSM to the contract labeling facility under the (b) (4) temperature at -20 C has not been validated.

6. Written procedures are not established for a manufacturing process step. Specifically, there is no written instruction on how long filled excipient gel vials can (b) (4) (b) (4) before being transferred into storage at -20 C.



SEE REVERSE OF THIS PAGE	EMPLOYEE(S) SIGNATURE	EMPLOYEE(S) NAME AND TITLE (*Print or Type*)	DATE ISSUED
	/S/	Obinna Echeozo, Lead Inspector/Microbiologist Jie He, Consumer Safety Officer Carl Perez, Consumer Safety Officer	01/20/2023

The observations of objectionable conditions and practices listed on the front of this form are reported:

1. Pursuant to Section 704(b) of the Federal Food, Drug and Cosmetic Act, or

2. To assist firms inspected in complying with the Acts and regulations enforced by the Food and Drug Administration.

Section 704(b) of the Federal Food, Drug, and Cosmetic Act (21 USC 374(b)) provides:

"Upon completion of any such inspection of a factory, warehouse, consulting laboratory, or other establishment, and prior to leaving the premises, the officer or employee making the inspection shall give to the owner, operator, or agent in charge a report in writing setting forth any conditions or practices observed by him which, in his judgement, indicate that any food, drug, device, or cosmetic in such establishment (1) consists in whole or in part of any filthy, putrid, or decomposed substance, or (2) has been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health. A copy of such report shall be sent promptly to the Secretary."