Health Products Regulatory Authority

Report No: ***2024/IE/33953***

STATEMENT OF NON-COMPLIANCE WITH GMP

Exchange of information between National Competent Authorities (NCAs) of the EEA following the discovery of serious GMP non-compliance at a manufacturer[1]

Part 1

Issued following an inspection in accordance with
Art. 111(7) of Directive 2001/83/EC as amended

The competent authority of Ireland confirms the following:
The manufacturer: ***Avenza Pharmaceuticals Private Limited***
Site address: ***Block No. 111 1, Jarod Samlaya Road, Vadadala, Savli, Vadodara, 391445, India***
OMS Organisation Id. / OMS Location Id.: ***ORG-100052172*** / ***LOC-100091827***

Other
(Human) Third Country

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on ***2023-08-25***, it is considered that **it does not comply with the Good Manufacturing Practice** requirements referred to in

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Note to receiving authorities: Please contact the issuing authority within 20 working days in case there are critical(2) medicinal products potentially affected by this statement.
Manufacturing Authorisation Holders directly affected by this statement have failed to comply with their obligations under Art. 46 of Directive 2001/83/EC or Art. 93(1)(j) to (l) of Regulation (EU) 2019/6 and as a consequence the Qualified Person referred to in Art. 48 of Directive 2001/83/EC and Art. 97(1) of Regulation (EU) 2019/6 is unable to perform the batch certification referred to in Art. 51 of Directive 2001/83/EC and Art. 97 (6) and (7) of Regulation (EU) 2019/6.
In exceptional circumstances there may be no objection to the Qualified Person certifying affected batches thereby allowing their release provided all of the following conditions are fulfilled:

1. Batch certification is performed in order to maintain supply of critical medicinal products only.
2. A documented risk assessment has been performed by, or on behalf of, the Qualified Person and additional actions have been implemented by the manufacturing and/or batch release site to mitigate the risks posed by the non-compliance. Note: Repeated testing alone is not normally sufficient risk mitigation but, together with other actions, can form part of a strategy commensurate with the nature and the level of risk.
3. A thorough risk-benefit evaluation has been performed for the acceptance of risk and a report prepared that takes full account of the nature of the non-compliance with the involvement of:
    - The Manufacturing Authorisation Holder and the Qualified Person of the site responsible for batch certification.

- The manufacturing site subject to this Statement of Non-Compliance, if different from the above.
- The relevant Marketing Authorisation Holder(s).

The report has been shared with the National Competent Authorities of the countries in which distribution of the affected batches is anticipated and that any comments from those authorities have been taken into account.

4. Written confirmation has been obtained from the National Competent Authorities in whose territories the affected batches are intended to be distributed that the product is considered critical on its territory, and that there is no objection to distribution.
5. The Supervisory Authority has been informed, if different from the above, and it has not suspended or revoked the relevant Manufacturing Authorisation.
6. The affected Marketing Authorisations have not been revoked or suspended.
7. Any further conditions imposed by the Supervisory Authority and other involved National Competent Authorities are met.

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[1] *The statement of non-compliance referred to in paragraph 111(7) of Directive 2001/83/EC and Art. 94(2) of Regulation (EU) 2019/6, as amended, is also applicable to importers.*

[2] *See Appendix 3 of the relevant procedure in the Compilation of Union Procedures.*

Part 2

Human Medicinal Products

1 NON-COMPLIANT MANUFACTURING OPERATIONS	
Include total and partial manufacturing (including various processes of dividing up, packaging or presentation), batch release and certification, storage and distribution of specified dosage forms unless informed to the contrary;	
1.2	**Non-sterile products**
	1.2.1 Non-sterile products (processing operations for the following dosage forms) 1.2.1.13 Tablets
1.5	**Packaging**
	1.5.1 Primary Packaging 1.5.1.13 Tablets
	1.5.2 Secondary packaging
1.6	**Quality control testing**
	1.6.3 Chemical/Physical

Part 3

1.Nature of non-compliance:

This Statement of GMP Non-compliance relates to proposed activities at the Avenza Pharmaceuticals Pvt. Limited site identified above. The company was not compliant with EU-GMP standards. At the time of the inspection the process for manufacture of Paracetamol Tablets had not been appropriately validated, the cleaning process had not been appropriately validated and the inventory management system had not been fully validated. Inspection Outcome: Seven major deficiencies were identified during the inspection. These related to the following areas: • Management of computerized systems. • Cleaning Validation • Process Validation • Physical/Chemistry Laboratory • Investigation of OOS Results • Management of the stability program • Vendor Qualification and Management

Action taken/proposed by the NCA

Others
Importers variation withdrawn.

Additional comments
Avenza Pharmaceuticals is in the process of implementing a remediation plan to meet EU requirements and the site may be re-inspected by an EU/EEA authority following confirmation of its implementation.

Products manufactured at site, if known	Products	Dosage Form	Reference Member State, National or EMA
Human Medicinal Products	Paracetamol	Tablets	

2024-08-02 Name and signature of the authorised person of the

Competent Authority of Ireland

Confidential
Health Products Regulatory Authority
Tel:***Confidential***
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