Italian Medicines Agency

Report No: ***IT/NRC/01/H/2025***

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 Italy confirms the following:
The manufacturer: ***Valpharma International S.p.A.***
Site address: ***Via Giambattista Morgagni 2, Pennabilli, 47864, Italy***
OMS Organisation Id. / OMS Location Id.: ***ORG-100008861*** / ***LOC-100014453***

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on ***2025-09-19***, it is considered that **it does not comply with the Good Manufacturing Practice** requirements referred to in

- The principles and guidelines of Good Manufacturing Practice laid down in Directive (EU) 2017/1572 and/or Commission Delegated Regulation (EU) 2017/1569, as reflected by the product categories stated in Part 2.

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) 1.2.1.1 Capsules, hard shell 1.2.1.8 Other solid dosage forms: Granules, pellets(en) 1.2.1.13 Tablets
	1.2.2 Batch certification
1.5	**Packaging**
	1.5.1 Primary Packaging 1.5.1.1 Capsules, hard shell 1.5.1.13 Tablets
	1.5.2 Secondary packaging
1.6	**Quality control testing**
	1.6.3 Chemical/Physical

2 NON-COMPLIANT IMPORTATION OPERATIONS	
2.1	**Quality control testing of imported medicinal products**
	2.1.3 Chemical/Physical

Clarifying remarks (for public users)

1.2.1.8 Other solid dosage forms: Granules, pellets.

Part 3

1.Nature of non-compliance:
The company manufactures exclusively non-sterile bulk products. Manufacturing activities were found to be non-compliant with EU GMP standards. The Pharmaceutical Quality System was deemed inadequate to ensure proper GMP implementation and full traceability of materials and production steps. Deficiencies were identified in the traceability of raw materials throughout the product lifecycle. Although management responsibilities were formally defined, an effective quality management system was not implemented. Inspection outcome: 11 deviations, including 3 classified as critical. Key findings include: 1) Raw materials stored in non-GMP areas/rooms. 2) Inconsistencies between the raw materials stored in non-GMP rooms and those reported in the BRs. 3) Senior management failed to implement an effective quality management system. 4) The ERP (SAP) information system does not track all the metadata necessary to ensure complete reconciliation and traceability of materials, raw materials, and excipients. 5) User logins within the scales are not properly tracked. 6) Some labels on the containers state "Technical Test." These activities are performed as part of the equipment qualification process or at the customer's simple request, making the conformity of the qualifications performed and/or the established frequency unreliable. 7) The qualification of some equipment (e.g. CD4 automatic coating machines) of the production equipment was not carried out in accordance with Annex 11.
Action taken/proposed by the NCA **Suspensionof the manufacturing authorisation No. aM-14/2025in Full** **Withdrawal, of current valid GMP certificate No. IT/21/H/2025** Restriction of current valid GMP certificate No. IT/21/H/2025 **Recall of batches already released** Market actions should be determined by each Member State based on QRM principles to avoid market shortages. Furthermore, marketing authorization applications, line extensions, or variations to existing marketing authorization applications should not be authorized at this time. **Prohibition of supply** The shortage of Valpharma medicinal products is not considered a real risk. The lack of alternative suppliers and the risk of shortages must be assessed on a case-by-case basis. **Others** This manufacturer should not be authorised in any new/ongoing marketing authorisation or variation applications for medicinal products as long as the non- compliance statement is in force.

2025-10-23

Name and signature of the authorised person of the Competent Authority of Italy

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Confidential
Italian Medicines Agency
Tel:***Confidential***
Fax:***Confidential***