

Federal Agency For Medicines And Health Products

Report No: **BE/NC/2026/01**

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 manufacturer¹

Part 1

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

The competent authority of Belgium confirms the following:

The manufacturer: ***Lianyungang Guike Pharmaceutical Co. Ltd.***

Site address: ***No. 1 Xianfeng Road, Dapu Industrial Zone, Lianyungang Economic And Technological Development Zone, Lianyungang, Jiangsu, 222000, China***

OMS Organisation Id. / OMS Location Id.: ***ORG-100018661 / LOC-100027454***

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on ***2026-06-12***, 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
- The principles of GMP for active substances referred to in Article 47 of Directive 2001/83/EC and an appropriate level of GMP as referred to in Article 46(f) of Directive 2001/83/EC.

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.

¹The 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.

²See 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;	
1.4	Other products or manufacturing activity
	1.4.3 Other: Active substance and active substance intermediate(en)

Manufacture of active substance. Names of substances subject to non-compliant:

ATRACURIUM BESILATE(en)

3. NON-COMPLIANT MANUFACTURING OPERATIONS - ACTIVE SUBSTANCES	
Active Substance:ATRACURIUM BESILATE	
3.1	Manufacture of Active Substance by Chemical Synthesis
	3.1.1 Manufacture of active substance intermediates 3.1.2 Manufacture of crude active substance 3.1.3 Salt formation / Purification steps: crystallisation
3.5	General Finishing Steps
	3.5.1 Physical processing steps: drying, milling 3.5.2 Primary Packaging (enclosing / sealing the active substance within a packaging material which is in direct contact with the substance)
3.6	Quality Control Testing
	3.6.1 Physical / Chemical testing

4. Non-Compliant Other Activities - Active Substances:

This Statement of Non-Compliance is extended to the activities performed in Workshop 2, where the identified GMP non-compliances were observed and assessed.

Clarifying remarks (for public users)

This Statement of Non-Compliance is extended to the activities performed in Workshop 2, where the identified GMP non-compliances were observed and assessed.

Part 3

1. Nature of non-compliance:

During the inspection of the manufacturing site, in the frame of EDQM's inspection programme, 21 deficiencies against EU GMP were identified. One deficiency was classified as critical due to inadequate control of contamination and cross-contamination risk in shared facilities. The risk assessments and contamination control strategy for Workshop 2 and the dispensing area were insufficiently robust, specific, justified, and effectively implemented, notably for exposed product operations, gowning, area and equipment cleanliness, material entry, dispensing activities, and the use of shared equipment for potentially highly potent products. Furthermore, absence of contraindications between APIs manufactured in the shared facility was not evaluated consistently. These represent a potential risk to patient safety. Five deficiencies were classified as major and were related to the following areas: cleaning validation and cleaning procedures, preventive maintenance and equipment condition, data integrity, change control management, and batch release and compliance to CEP. In addition, 15 other deficiencies were found (i.e. records, quality system, personnel training, calibration, labelling management, equipment qualification).

Action taken/proposed by the NCA**Requested Variation of the marketing authorisation(s)**

For medicinal products containing APIs manufactured by LIANYUNGANG GUIKE PHARMACEUTICAL CO. LTD. in Workshop 2, assessment of the MA to remove or substitute this manufacturer of active substances and intermediates should be considered. In addition, no new MAs should be granted for products relying on this API source while the statement of non-compliance remains in force.

Recall of batches already released

If there are alternative suppliers and there is no risk of shortage, recall of medicinal product should be evaluated by the involved NCAs following assessment conducted in conjunction with MAHs.

Prohibition of supply

Due to the nature of the non-compliance, prohibition of supply is recommended, unless there are no alternative suppliers and there is a risk of shortage.

Suspension or voiding of CEP (action to be taken by EDQM)

The EDQM had taken the decision to suspend all granted CEPs from LIANYUNGANG GUIKE PHARMACEUTICAL CO. LTD. CEP 2013-019 Atracurium besilate CEP 2021-236 Cisatracurium besilate CEP 2017-271 Entecavir monohydrate (intermediate)

2026-08-21

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

Confidential

Federal Agency For Medicines And Health Products

Tel: **Confidential**

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