

***French National Agency for Medicines and Health Products Safety***

Report No: **19MPP051NCR01**

**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 <sup>1</sup>***

**Part 1**

Issued following an inspection in accordance with :  
Art. 80(7) of Directive 2001/82/EC as amended

The competent authority of France confirms the following:

The manufacturer: ***Jiangxi Dongfeng Pharmaceutical Co., Ltd***

Site address: ***1 Dongfeng Road, Leping Industrial Park, Leping City, Jiangxi Province, 333300, China***

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on **2019-06-27** , it is considered that **it does not comply with the Good Manufacturing Practice** requirements referred to in

- The principles of GMP for active substances referred to in Article 51 of Directive 2001/82/EC .

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<sup>1</sup> The statement of non-compliance referred to in paragraph 111(7) of Directive 2001/83/EC and 80(7) of Directive 2001/82/EC, as amended, shall also be required for imports coming from third countries into a Member State.

**Part 2**

**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;

<b>1.4</b>	<b>Other products or manufacturing activity</b>
	<p>1.4.2 <i>Sterilisation of active substance/ excipients/ finished product</i></p> <p>1.4.2.1 Filtration</p> <p style="padding-left: 40px;">Special Requirements</p> <p style="padding-left: 40px;">1 B-lactam Antibiotics</p>

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

***BENZYL PENICILLIN PROCAINE +1% LECITHIN (STERILE)( en)***

***BENZYL PENICILLIN BENZATHINE +1% LECITHIN (STERILE)( en)***

**3. NON-COMPLIANT MANUFACTURING OPERATIONS - ACTIVE SUBSTANCES**

Active Substance : BENZYL PENICILLIN PROCAINE +1% LECITHIN (STERILE)

<b>3.1</b>	<b>Manufacture of Active Substance by Chemical Synthesis</b>
	<p>3.1.3 Salt formation / Purification steps : Crystallization, Filtration</p>
<b>3.4</b>	<b>Manufacture of sterile Active Substance</b>
	3.4.1 Aseptically prepared
<b>3.5</b>	<b>General Finishing Steps</b>
	<p>3.5.1 Physical processing steps : Drying, Micronizing</p> <p>3.5.2 Primary Packaging (enclosing / sealing the active substance within a packaging material which is in direct contact with the substance)</p> <p>3.5.3 Secondary Packaging (placing the sealed primary package within an outer packaging material or container. This also includes any labelling of the material which could be used for identification or traceability (lot numbering) of the active substance)</p>
<b>3.6</b>	<b>Quality Control Testing</b>
	<p>3.6.1 Physical / Chemical testing</p> <p>3.6.3 Microbiological testing including sterility testing</p>

Active Substance : BENZYL PENICILLIN BENZATHINE +1% LECITHIN (STERILE)

<b>3.1</b>	<b>Manufacture of Active Substance by Chemical Synthesis</b>
	<p>3.1.3 Salt formation / Purification steps : Crystallization, Filtration</p>
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	<p>3.5.1 Physical processing steps : Drying, Micronizing</p>

	3.5.2 Primary Packaging (enclosing / sealing the active substance within a packaging material which is in direct contact with the substance)
	3.5.3 Secondary Packaging (placing the sealed primary package within an outer packaging material or container. This also includes any labelling of the material which could be used for identification or traceability (lot numbering) of the active substance)
<b>3.6</b>	<b>Quality Control Testing</b>
	3.6.1 Physical / Chemical testing
	3.6.3 Microbiological testing including sterility testing

Clarifying remarks (for public users)

***Veterinary use / Signatory : Mr Guillaume Renaud, Deputy Director of inspection division --- The ANSM does not issue hard copies of good practices certificates***

### Part 3

<b>1. Nature of non-compliance:</b>
Overall, 28 deficiencies were observed during the inspection, including 4 Major deficiencies: [Major 1] Inappropriate frequency for the microbiological and chemical testing of the steam used for equipment sterilization; [Major 2] Risks of contamination in the manufacturing area of sterile APIs; [Major 3] Failure in the sterilization process and in the microbiological monitoring of the RABS (Restricted Access Barrier System); [Major 4] Failure for the temperature monitoring process during sterilization run for several equipment; [Major 5] Failure for the evaluation and the management of a supplier of the sterile LPDE (Low Density Polyethylene) bags used for the packaging of sterile APIs; [Major 6] Risks of loss of sterility of sterile APIs during the filling process; [Major 7] Use of reusable drums not under control; [Major 8] Failure for the aseptic process simulation test; [Major 9] Failure for the recovery process of solvents.
<b>Action taken/proposed by the NCA</b>
<b>Recall of batches already released</b> A recall of products should be considered using QRM principles.
<b>Prohibition of supply</b> After issuance of the non-compliance report and as long as it remains active, the site should not be named in any new MAs or used in drug compounding activities.
<b>Additional comments</b> The existence of MAs or MA variations referencing an active substance manufactured by Jiangxi Dongfeng Pharmaceutical Co., Ltd has to be verified. Where such a MA exists, the removal of the site from the MA should be considered using quality risk management (QRM) principles.

2019-10-17

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

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