Swissmedic, Swiss Agency for Therapeutic Products

Report No: ***CH20-0566***

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

Part 1

Issued under the provisions of the Mutual Recognition Agreement between the European Union and ***Switzerland***

The competent authority of Switzerland confirms the following:
The manufacturer: ***Legacy Pharmaceuticals Switzerland GmbH***
Site address: ***Rührbergstrasse 21, Birsfelden, 4127, Switzerland***
DUNS Number: ***48-371-8149***

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on ***2020-08-28*** , it is considered that **it does not comply with the Good Manufacturing Practice** requirements referred to in

The Good Manufacturing Practice requirements referred to in the Agreement of Mutual Recognition between the European Union and ***Switzerland***

EudraGMP

Part 2

Human Medicinal Products
Veterinary Medicinal Products
Human Investigational 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;

1.1	**Sterile products**
	1.1.1 Aseptically prepared (processing operations for the following dosage forms) 1.1.1.1 Large volume liquids 1.1.1.3 Semi-solids 1.1.1.4 Small volume liquids 1.1.1.6 Other: Solids: Aseptic lyophilisation of sterile bulk and aseptic filling of sterile powder(en)
	1.1.2 Terminally Sterilised (processing operations for the following dosage forms) 1.1.2.1 Large volume liquids 1.1.2.3 Small volume liquids
	1.1.3 Batch certification
1.3	**Biological medicinal products (list of product types)**
	1.3.1 Biological medicinal products (list of product types) 1.3.1.6 Human or animal extracted products
	1.3.2 Batch Certification (list of product types) 1.3.2.6 Human or animal extracted products

Manufacture of active substance. Names of substances subject to non-compliant :
SWISSMEDIC LIST OF APIS, SEE 4 ACTIVE SUBSTANCES(en)
4. Non-Compliant Other Activities - Active Substances :
Sterile dry deproteinized dialysate of calf blood, Sterile Protamin HCl, any other sterile active pharmaceutical ingredient

Clarifying remarks (for public users)

None

Part 3

1. Nature of non-compliance:

During a Swissmedic inspection performed on August 27 – 28, 2020, 5 critical, 14 major and 6 other deficiencies were identified. The deficiencies included: - insufficient control over the air quality of clean rooms; - incomplete qualification of the air handling system of some of the clean rooms; - incomplete validation of sterile filtration operations of aseptically manufactured products; - inadequate frequency of media fills (less than 2x/year) on some of the production lines; - deviations occurring in the context of media fills were not closed in a timely manner (note, however, that the deviations did not concern turbidities); - inadequate deviation management - quality, maintenance and qualification status of equipment is not state of the art. Action taken/proposed by the NCA on the manufacturing Authorisation Swissmedic has initiated a legal procedure to partially suspend the manufacturing authorization of the company (suspension of all activities related to the manufacturing of sterile products until a follow-up inspection has confirmed the implementation of appropriate corrective actions). The company has stopped manufacturing, distribution and release of all sterile products and has committed to inform its clients on 09.09.2020. Until 18.09.2020, the company will perform a thorough risk assessment of all batches of sterile products that are currently on the market. Based on the outcome of the risk assessment, a decision whether to recall batches or not on the Swiss market will be taken. Any recall decision will be communicated via the rapid alert system. Implementation of corrective actions has been initiated. The CAPA will be reviewed and followed up by Swissmedic. While the company's quality systems were functional, in principle, there was a conspicuous lack of management oversight and, consequently, inadequate resources to address the above issues. Overall, the company's operations concerning sterile manufacturing are therefore considered not in compliance with GMP. Action taken/proposed by the NCA on GMP Certificates GMP Certificates of the company have been so far issued outside the EudraGMDP database. Already issued GMP certificates are to be considered no longer valid as for the manufacturing of sterile medicinal products.

Action taken/proposed by the NCA

Requested Variation of the marketing authorisation(s)
This manufacturer should not be authorized in any new/ongoing marketing authorization or variation application for sterile medicinal products

Recall of batches already released
Swissmedic will initiate a recall of all batches of sterile products that are on the Swiss market, with the exception of products that are critical due to its therapeutic use and/or availability of alternatives.

Additional comments
Products that are considered to be critical can be maintained on a risk based approach decision by the partner authorities.

2020-09-30

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

---

Confidential
Swissmedic, Swiss Agency for Therapeutic Products
Tel: ***Confidential***
Fax: ***Confidential***