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Health Products Regulatory Authority

Report No : 12663

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: Pharma International Company

Site address: Al Qastal, Airport Road, P.O. Box 334, Al Jubaiha 11941, Amman, Jordan

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on **2016-10-13**, 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 2003/94/EC

(1) 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.

Human Medicinal Products

1 NON-COMPLIANT MANUFACTURING OPERATIONS

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
 1.2.1.4 Impregnated matrices
 1.2.1.5 Liquids for external use
 1.2.1.6 Semi-solids
 1.2.1.11 Suppositories
 1.2.1.12 Tablets

 - 1.2.1.13 Tablets
 1.2.1.17 Other: Powders for Reconstitution(en)

1.5 Packaging

- 1.5.1 Primary Packing
 1.5.1.1 Capsules, hard shell
 1.5.1.5 Liquids for external use
 1.5.1.6 Liquids for internal use
- 1.5.1.6 Liquids tor internal use
 1.5.1.11 Semi-solids
 1.5.1.12 Suppositories
 1.5.1.13 Tablets
 1.5.1.17 Other non-sterile medicinal products: Powders for Reconstitution(en) 1.5.2 Secondary packing

1.6 Quality control testing

- 1.6.2 Microbiological: non-sterility 1.6.3 Chemical/Physical

Nature of non-compliance: During the most recent inspection of the facility, one Critical deficiency and several Other deficiencies were identified. The Critical deficiency related to the Pharmaceutical Quality System and it was comprised of six sub-parts. These related to the following: 1. The management of deviations, incidents and non-conformances 2. The management of changes (Change Control) 3. Product Quality Reviews (PQRs) 4. The controls in relation to the prevention of contamination and cross-contamination 5. Process validation 6. The on-going stability program for Cefaclor 250mg & 500mg capsules. Multiple individual deficiency points were identified in each of the above areas, and taken together, they collectively were considered to represent a critical failing of the Pharmaceutical Quality System. Note that the HPRA's risk assessment of the deficiencies was circulated on 21 February 2017 together with the Draft Statement of Non-compliance.

Action taken/proposed by the NCA:

Requested Variation of the marketing authorisation(s)
The HPRA is recommending that Pharma International Company be removed from any EEA Marketing Authorisations (MAs) as a manufacturer of non-sterile medicinal products. Non-EEA authorities should consider the impact of this issue on any MAs in their own territory. Each Member State and Partner Authority should conduct its own review to determine those MAs that may be impacted by this recommendation.

Recall of batches already released

No recall action is recommended. Note that the HPRA's risk assessment of the deficiencies was circulated on 21 February 2017 together with the Draft Statement of Non-compliance.

Prohibition of supply

Yes. No further supply of medicinal products from Pharma International Company into the EEA is recommended until such time as a new EEA GMP Certificate has been granted to the manufacturer. Non-EEA authorities should consider the supply situation in their own territory.

Suspension or voiding of CEP (action to be taken by EDQM) Not applicable

Suspension of clinical trials Not applicable

Additional comments: Note: The GMP Certificate, No. 32687, for Pharma International Company was withdrawn from EudraGMDP on 11 January 2017 by the HPRA. Note also that Pharma International Company is named as a contact manufacturer on two Irish Manufacturing & Import Authorisations, The HPRA proposes to have Pharma International Company removed as a contract manufacturer from these MIAs.

Teleconference Date : 2017-	Teleconference Time (CET): 3:00	Dial in no.: This was provided in advance of the telecon that was held on 7
03-07	p.m.	March 2017.

Products manufactured at site, if known	Products	Dosage Form	Reference Member State, National or EMA
Human Medicinal Products	Cefaclor 250mg	Hard Shell Capsules	National, MRP or DCP
	Cefaclor 500mg	Hard Shell Capsules	National, MRP or DCP
	Risperidone - multiple strengths	Tablets	National, MRP or DCP.

2017-03-15

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

Confidential

Health Products Regulatory Authority

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