# Desk Assessment of Active Pharmaceutical Ingredient (API) Manufacturer

## Part 1
### General information

<table>
<thead>
<tr>
<th><strong>Company information</strong></th>
<th><strong>Name of Manufacturer</strong></th>
<th>Shanghai Shyndec Pharmaceutical (Haimen) Co Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Corporate address of manufacturer</strong></td>
<td>Shanghai Shyndec headquarter address is 1320 Beijing Road (West), Jingan District, Shanghai, China</td>
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<tr>
<td><strong>Name &amp; address of manufacturing site</strong></td>
<td>No 1 Linjiang Avenue, Linjiang Town, Haimen, Jiangsu, 226133, China (People's Republic of)</td>
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<tr>
<td><strong>Synthetic Unit/Block/Workshop</strong></td>
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### Desk assessment details

<table>
<thead>
<tr>
<th><strong>Start and end dates of review</strong></th>
<th>23 – 24 August 2019</th>
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<tbody>
<tr>
<td><strong>API covered by this desk assessment</strong></td>
<td>Zidovudine, Abacavir sulfate</td>
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## Part 2

<table>
<thead>
<tr>
<th><strong>Summary of SRA/NRA inspection evidence considered (from most recent to last) and comments</strong></th>
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<tbody>
<tr>
<td><strong>U.S. Food and Drug Administration</strong></td>
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## Part 3

### Summary of the last WHO inspection

**Date and conclusion of most recent WHO inspection**
August 24 – 27, 2015

Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the deficiencies listed in the Inspection Report, a decision on the compliance of Shanghai Shyndec Pharmaceutical (Haimen) Co Ltd, located at No 1 Linjiang Avenue, Linjiang Town, Haimen, Jiangsu, China, with WHO GMP guidelines will be made after the manufacturer's response to the deficiencies has been assessed.

Inspection closing letter, dated 14 January 2016:
The actions taken or proposed to be taken in relation to the observations have been reviewed by the inspectors. In general, they are considered acceptable and their satisfactory implementation will be verified during future inspections.

On the basis of the findings of the inspection and these subsequent response(s) the inspectors have recommended that the API:

- APIMF267 Zidovudine is considered to be manufactured in compliance with WHO GMPs for Active Pharmaceutical Ingredients published by WHO for the scope activities listed below:
  - manufacture and packaging of Active Pharmaceutical Ingredients by chemical synthesis; and
  - analytical and microbiological testing of raw materials associated intermediates and API

### Brief summary of manufacturing activities

Production and quality control of intermediates and finished APIs (chemical synthesis)

### General information about the company and manufacturing

Shanghai Shyndec Pharmaceutical (Haimen) Co., Ltd. (Hereinafter refer to as "Shyndec Haimen") was founded in January 2010, as a wholly owned subsidiary of the Shanghai Shyndec Pharmaceutical Co., Ltd. Shyndec Haimen started the trial production in August 2013 after the Government issued the trial production approval. Main products of Shyndec Haimen were anti-HIV, macrolide
The site is located at No 1 Linjiang Avenue, Linjiang Town, Haimen, Jiangsu, China. There were four production workshops, one hydrogenation workshop, one building for QC laboratory and administration office, one utility centre, and warehouses for starting and finished substances. Workshop 3 was divided into 2 parts: General production area and “clean area”.

Focus of the last WHO inspection:
Inspection focused on the production and quality control operations related to the Zidovudine API (APIMF267).

Areas inspected:
- Quality Management
- Personnel
- Buildings and facilities
- Process equipment
- Documentation and records
- Materials management
- Production and in-process controls
- Packaging and identification labelling of APIs and intermediates
- Storage and distribution
- Laboratory controls
- Validation
- Change control
- Rejection and reuse of materials
- Complaints and recalls
- Contract manufacturers (including laboratories)

Out of scope and restrictions (last WHO inspection):
N/A

WHO APIs covered by the last WHO inspection:
Zidovudine

Additional products to be covered by this desk assessment:
Abacavir sulfate

<table>
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<tr>
<th>Abbreviations</th>
<th>Meaning</th>
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<tbody>
<tr>
<td>BMR</td>
<td>Batch manufacturing record</td>
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<tr>
<td>BPR</td>
<td>Batch production record</td>
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<tr>
<td>CAPA</td>
<td>Corrective and preventive action</td>
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<tr>
<td>CC</td>
<td>Change control</td>
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<tr>
<td>GMP</td>
<td>Good manufacturing practices</td>
</tr>
<tr>
<td>NC</td>
<td>Non-conformity</td>
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<td>NRA</td>
<td>National regulatory agency</td>
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<tr>
<td>PQR</td>
<td>Product quality review</td>
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<td>PQS</td>
<td>Pharmaceutical quality system</td>
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<td>QA</td>
<td>Quality assurance</td>
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<tr>
<td>QC</td>
<td>Quality control</td>
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Part 4  Summary of the assessment of supporting documentation

a) Manufacturing authorization and GMP certificate granted by the local authority:
   Submitted:
   • GMP certificate No JS20170695, issued 30/8/2017, valid until 29/8/2022.
   • Manufacturing license: No. Su20160259, issued by Jiangsu Food and Drug Administration, for the manufacture of the APIs and pharmaceutical products, dated July 11, 2018, valid until December 31, 2020.

b) Site master file (SMF):
   Submitted – acceptable, prepared according to the WHO TRS No. 961, Annex 14

c) List of all the APIs or other products (intermediates, dosage forms) manufactured on-site:
   1. Azithromycin
   2. Zidovudine
   3. Abacavir sulfate
   4. Nebivolol hydrochloride
   5. L-alpha-Glycerophosphoryl Choline

d) List of all regulatory inspections performed in the last 3 years and their outcomes:

<table>
<thead>
<tr>
<th>Inspection dates</th>
<th>Authority</th>
<th>Product name</th>
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<tbody>
<tr>
<td>Apr. 23-25 &amp; 28-30, 2014</td>
<td>USFDA</td>
<td>Zidovudine</td>
</tr>
<tr>
<td>Jun. 22-26, 2015</td>
<td>ANVISA</td>
<td>Azithromycin</td>
</tr>
<tr>
<td>Aug. 24-27, 2015</td>
<td>WHO</td>
<td>Zidovudine</td>
</tr>
<tr>
<td>Jul. 14-16, 2016</td>
<td>CFDA</td>
<td>Zidovudine</td>
</tr>
<tr>
<td>Apr. 10-12, 2017</td>
<td>MOH Russia Federation</td>
<td>GMP inspection</td>
</tr>
<tr>
<td>May 21-23, 2017</td>
<td>CFDA</td>
<td>Azithromycin</td>
</tr>
<tr>
<td>Dec. 11-15, 2017</td>
<td>USFDA</td>
<td>Azithromycin, Zidovudine</td>
</tr>
</tbody>
</table>

e) Most recent product quality reviews (PQRs) of the concerned WHO APIs:
   Submitted and reviewed for:
   • Zidovudine API
   • Abacavir sulfate API
f) Batch manufacturing and packaging records, including the analytical part, for the most recently released batch of relevant APIs:
   Submitted and reviewed for:
   - Zidovudine
   - Abacavir sulfate

g) Master batch manufacturing and packaging records of the APIs of interest:
   Submitted for:
   - Zidovudine
   - Abacavir sulfate

h) Recalls in the past three years related to APIs with quality defects:
   Not reported

i) Confirmation by the senior quality assurance representative that a full self-inspection or external audit dedicated to the API(s) has been performed and all matters dealt with:
   Submitted and reviewed.

j) Copy of any warning letter, or equivalent regulatory action, issued by any authority for their market, to which the site provides or has applied to provide the API(s):
   Form 483 issued on December 15th, 2017 submitted

k) Out-of-stock situations:
   Not reported

l) Additional documents submitted:
   N/A

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<th>Part 5</th>
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<td>Conclusion – Desk assessment outcome</td>
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Based on the previous WHO inspections and on the GMP evidence received and reviewed, it is considered that a desk assessment is acceptable in lieu of a WHO onsite inspection. The site Shanghai Shyndec Pharmaceutical (Haimen) Co Ltd located at No 1 Linjiang Avenue, Linjiang Town, Haimen, Jiangsu, 226133, China (People's Republic of) is considered to be operating at an acceptable level of compliance with WHO GMP guidelines for APIs.

This WHOPIR will remain valid for 3 years, provided that the outcome of any inspection conducted during this period is positive.
Part 6  List of guidelines referenced in this inspection report


   [http://whqlibdoc.who.int/trs/WHO_TRS_929_eng.pdf?ua=1](http://whqlibdoc.who.int/trs/WHO_TRS_929_eng.pdf?ua=1)

   [https://apps.who.int/iris/bitstream/handle/10665/312316/9789241210287-eng.pdf?ua=1](https://apps.who.int/iris/bitstream/handle/10665/312316/9789241210287-eng.pdf?ua=1)
   
   https://apps.who.int/iris/bitstream/handle/10665/312316/9789241210287-eng.pdf?ua=1

   

   

   
   http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1

   
   http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1

   
   http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1

   
   http://whqlibdoc.who.int/trs/WHO_TRS_943_eng.pdf?ua=1
*Short name: WHO TRS No. 961, Annex 2*  
[http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1](http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1)

*Short name: WHO TRS No. 981, Annex 2*  

*Short name: WHO TRS No. 981, Annex 3*  

*Short name: WHO TRS No. 961, Annex 14*  
[http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1](http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1)

*Short name: WHO TRS No. 992, Annex 3*  

*Short name: WHO TRS No. 992, Annex 4*  

*Short name: WHO TRS No. 992, Annex 5*  
**Short name: WHO TRS No. 996, Annex 5**  

22. Stability testing of active pharmaceutical ingredients and finished pharmaceutical products.  
**Short name: WHO TRS No. 1010, Annex 10**  

**Short name: WHO TRS No. 996, Annex 10**  

**Short name: WHO TRS No. 992, Annex 6**  