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Prequalification Team Inspection services WHO INSPECTION REPORT

Desk Assessment Active Pharmaceutical Ingredients (API) manufacturer

Part 1	General information			
Company information				
Name of Manufacturer	Hetero Labs Limited (Unit I)			
Corporate address of	Hetero Corporate, 7-2-A2, Indust	rial Estates, Sanath Nagar, I	Hyderabad– 500 018,	
manufacturer	Telangana, India	, 2 ,	,	
	,			
Name & address of	Hetero Labs Limited (Unit I), Sur	vev No. 10, IDA, Kazipally	. Gaddapotharam.	
manufacturing site	Jinnaram Mandal Sangareddy Dis			
Synthetic Unit/Block/	A, B, C, D, E	, , , , , , , , , , , , , , , , , , , ,		
Workshop				
1				
Start and end dates of	02 September – 01 October 2019			
review	or askassas as a successive			
API covered by this	API	PQ status	Manufacturing Blocks	
desk assessment	Lopinavir	Accepted	C & D	
	Stavudine	Accepted	Discontinued	
	Tenofovir disoproxil fumarate	Accepted	E & C	
	Emtricitabine	Accepted	E, C & D	
	Lamivudine	Accepted	С	
	Abacavir (sulfate)	Accepted	С	
	Zidovudine	Accepted	С	
	Efavirenz	Accepted	D	
	Atazanavir monosulphate	Accepted	A	
	Abacavir (sulfate)	Accepted	С	
	Sofosbuvir	Accepted	В	
	Dolutegravir Sodium	Accepted	E, B & D	
	Daclatasvir dihydrochloride	Accepted	В	
	Darunavir	Under assessment	A	
List of documents	Documentation related to	US FDA inspection		
submitted	2. Documentation related to	Health Canada letter		
according to the	3. List of regulatory inspect	ions during last 5 years		
company	4. Documentation related to	EMA inspection		
	5. Documentation related to OGYEI Hungary inspection			
	6. COFEPRIS, Mexico GMP certificate and inspection7. Ministry of industry and trade of Russian federation GMP certificate			
		shared equipment between s	-	
		Pharmaceuticals and Medi	cal Devices Agency Japan	
	GMP inspection			
	10. Hetero Unit I AHU layou		ıt, site layout	
	11. SMF dated 27 March 201	.9		

WHOPIR desk assessment Hetero Labs Limited, Unit I, India API

02 September – 01 October 2019

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	12. Analytical test reports and BPRs for		
	a. Abacavir sulfate (AB)		
	b. Abacavir sulfate (AV)		
	c. Atazanavir		
	d. Darunavir		
	e. Dolutegravir		
	f. Emtricitabine		
	g. Lopinavir		
	h. Sofosbuvir		
	13. APQRs 2018 for		
	a. Abacavir sulfate (AB)		
	b. Abacavir sulfate (AV)		
	c. Atazanavir APQR		
	d. Daclatasvir APQR		
	e. Duranavir APQR		
	f. Dolutegravir APQR		
	g. Efavirenz APQR		
	h. Emtricitabine		
	i. Lamivudine		
	j. Lopinavir		
	k. Sofosbuvir		
	1. Stavudine		
	m. Tenofovir		
	n. Zidovudine APQR 2018		
	14. Batch shifting and packaging records for:		
	a. Abacavir sulfate (DOV)		
	b. Abacavir sulfate (AB)		
	c. Atazanavir		
	d. Daclatasvir		
	e. Duranavir		
	f. Dolutegravir		
	g. Efavirenz		
	h. Emtricitabine		
	i. Lopinavir APQR 2018		
	j. Sofosbuvir APQR 2018		
	k. Stavudine APQR 2018		
	15. List of recalls		
	16. Self-inspection declaration		
	17. Out of stock situations		
	18. Risk assessment report for possible contamination of nitrosamine impurities, dated		
	25 February 2019		
	19. Amendment to risk assessment report for Nitrosamine impurities in WHO APIs,		
	dated 27 February 2019		
	20. 2 nd amendment to risk assessment report for Nitrosamine impurities in WHO APIs		
Part 2	Summary of SRA/NRA inspection evidence considered (from most recent to last) and		
	comments		
U.S. Food and Drug	Dates of inspection: 17 – 28 September 2018		

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Administration	Type of inspection:	Related to Sartan APIs	
Administration	Type of hispection.	Related to Sartan Ai Is	
	Block/Unit/Workshop	Manufacturing Blocks-A, B, C, D, E, H & J, including the General Division where WHO APIs are manufactured	
	APIs covered:	APIs by chemical synthesis	
EMA (AIFA Italy)	Dates of inspection:	28 January – 2 February 2019	
	Type of inspection:	Full inspection report not received as of 1 October 2019	
	Type of inspection:	Post approval	
	Block/Unit/Workshop:	A, B, C, D, E, H, J, G, M and ONCOLOGY BLOCKS (F, I, K)	
	APIs covered:	APIs by chemical synthesis	
National Institute of	Dates of inspection:	18 – 22 March 2019	
Pharmacy and Nutrition OGYEI,	Type of inspection:	On behalf of EU in order to check the compliance of API to the EU GMP standards	
Hungary	Block/Unit/Workshop:	 Block A Block C Block D Block F Block I Block J Block K 	
	APIs covered:	APIs by chemical synthesis	
Pharmaceuticals and	Dates of inspection:	10 – 13 December 2018	
Medical Devices Agency, Japan	Scope of inspection:	Pre-approval GMP compliance inspection of gefitinib, pre- approval GMP compliance inspection for partial change (added manufacturing site)	
	Block/Unit/Workshop:	 Storage area WAREHOUSE (0): Raw material warehouse FSA (0) GROUND FLOOR: Finished product warehouse Solvent tanks Manufacturing area I-BLOCK: WET SECTION, PHARMA SECTION F-BLOCK: WET SECTION, PHARMA SECTION 	
Part 3			
Date and conclusion of most recent WHO inspection	considering the finding Inspection Report, a de No. 10. Gaddapotharam INDIA with WHO GMF	24 February 2017 and on the areas inspected, the people met, and the documents reviewed, and idering the findings of the inspection, including the observations listed in the ection Report, a decision on the compliance of HeteroLabs Ltd. Unit-I, 1 Survey 10. Gaddapotharam Village, Jinnaram Mandal, Sangareddy District, Telangana, IA with WHO GMP guidelines will be made after the manufacturer's response to all e observations hasbeen assessed.	
	Inspection closing letter, dated 3 January 2018:		
	inspectors have recomm	ndings of the inspection and these subsequent responses the ended that the API:	

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	 Lopinavir Stavudine Tenofovir Disoproxil Fumarate Emtricitabine Lamivudine anhydrous (Not covered) Abacavir hemisulphate, Zidovudine (Not covered) Efavirenz (Not covered) Atazanavir Sulphate Abacavir Sulfate (Process-II) Sofosbuvir Dolutegravir Sodium are considered to be compliant with the standards of Good Manufacturing Practices (GMP) for APIs published by the World Health Organization (WHO), for the scope of activities listed below: Manufacture and packaging of APIs.
Brief summary of manufacturing activities	Production and Laboratory Control of APIs
General information about the company and manufacturing site (according to the latest WHO report)	The site is located in 7-2-A2, Industrial Estates, Sanath Nagar, Hyderabad- 500 018, Telangana, India. There are approximately 1467 employees at the site at the time of inspection. There were 13 Production blocks (A, B, C, D, E, F, G, H, I, J, K, L, M) for pharmarelated production: Blocks E, G and M were for intermediates production. Blocks F, I,K and L were for oncology APIs. Penicillin, beta lactam antibiotics and hormones APIs were not produced on this site.
Focus of the last WHO inspection	Production and quality control of APIs
Unit / block / workshop number	Block A, B, C, D and H Production blocks: E/CS-I, VCS-III, IDS, E/PB-11, I/PS-III. Warehouses, including raw material (RM), finished APIs, packaging material, extended WH ("Warehouse 2") for solid material. Water system 1.
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

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Complaints and recalls		
Contract manufacturers (including laboratories)		
Inspection was limited to the APIs produced, with WHO grade only.		
Out of scope: Oncology APIs		
Lopinavir		
Stavudine		
Tenofovir Disoproxil Fumarate		
Emtricitabine		
Abacavir hemisulphate		
Atazanavir Sulphate		
Abacavir Sulfate (Process-II)		
Sofosbuvir		
Dolutegravir Sodium		
Lamivudine		
Zidovudine		
Efavirenz		
Daclatasvir dihydrochloride		
Darunavir		
Darunavir		
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eaning Intel manufacturing record Intel production re		

Part 4 Summary of the assessment of supporting documentation

a) Manufacturing authorization and GMP certificate granted by the local authority:

Manufacturing licence: 25/MD/AP/97/B/R in Form.25, valid till 31/12/2022

GMP certificate: according to Drugs and Cosmetics Act, 1940 and Rules, dated 24.01.2019, valid till 24.01.2022.

b) Site master file (SMF):

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SMF No SMF-001-20, effective 27/03/2019 submitted - acceptable, prepared according to the WHO TRS No. 961, Annex 14.

List of all the APIs or other products manufactured on-site:

S. No.	Mfg. Block	Section	Names of APIs being manufactured	
1	Block - A	Section-I	Darunavir Amorphous, Darunavir Ethanolate, Atazanavir Sulfate, Ramipril,	
			Cilazapril, Maraviroc	
		Section-II	Terbinafine Hydrochloride, Levomilnacipran, Milnacipran Hydrochloride	
		Section-III	Aripiprazole, Darunavir Ethanolate	
		Section-IV	Ramipril, Cilazapril, Bictagravir Sodium, Darunavir Ethanolate	
2	Block - B	Section-I	Atomoxetine Hydrochloride, Saquinavir mesylate, Pioglitazone	
			Hydrochloride, Etravirine, Vortioxetine Hydrobromide, Daclatasavir	
			dihydrochloride	
		Section-II	Hydralazine Hydrochloride, Dolutegravir Sodium.	
		Section-III	Torsemide, Tenofovir, Alafanamide Hemifumarate, Sofosbuvir,	
			Desloratadine, Lamivudine, Emtricitabine	
		Section-IV	Finasteride, Dutasteride, Eplerenone	

S. No.	Mfg. Block	Section	Names of APIs being manufactured	
3	Block - C	Section-I	Tenofovir disoproxil, Simvastatin, Tenofovir Disoproxil Fumarate,	
			Lopinavir, Oseltamivir Phosphate, Zidovudine, Emtricitabine, Quetiapine	
			Fumarate	
		Section-II	Escitalopram Oxalate, Nevirapine Anhydrous, Zidovudine, Abacavir	
			Sulfate, Nevirapine Hemihydrate	
		Section-III:	Abacavir Sulfate, Tenofovir disoproxil, Emtricitabine, Lamivudine (Form-	
			I), Abacavir, Efavirenz, Zidovudine	
		Section-IV	Quetiapine fumarate, Oseltamivir Phosphate, Hydralazine Hydrochloride,	
			Pioglitazone Hydrochloride, Lopinavir	
4	Block - D	Section-I	Dolutegravir Sodium, Entacapone, Emtricitabine, Oseltamivir Phosphate,	
			Efavirenz	
		Section-II	Lopinavir, Etoricoxib Efavirenz, Lamivudine, Loratadine	
		Section-III	Levetiracetam, Emtricitabine	
		Section-IV	Zonisamide, Ezetimibe, Entacapone	
5	Block – E	Intermediates	Ramipril, Terbinafine Hydrochloride, Dolutegravir Sodium, Pioglitazone	
			Hydrochloride, Ezetimibe, Emtricitabine, Tenofovir disoproxil fumarate,	
			Simvastatin, Cilazapril	
6	Block - H	Section-I:	Valsartan, Olmesartan Medoxomil, Irbesartan	
		Section-II:	Irbesartan (Form-A)	
7	Block - J	Section-I:	Losartan Potassium	
		Section-II:	Losartan Potassium	
8	Block – G	Intermediates	Escitalopram oxalate, Nevirapine Anhydrous	
9	Block - M	Intermediates	Escitalopram oxalate	

Anti-cancer Division



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S.No.	Mfg. Block	Section	Names of APIs being manufactured	
10	Block – I	Section-I	Imatinib Mesylate Form-Amorphous, Gefitinib, Nilotinib HCl, Erlotinib HCl	
		Section-II	Imatinib Mesylate (Form-Alpha), Bicalutamide Form H1	
		Section-III	Gemcitabine Hydrochloride, Pemeterxide Disodium 2.5 Hydrate, Cyclophosphamide Monohydrate	
		Section-IV	Abiraterone Acetate, Capecitabine	
		Section-I	Lenalidomide Form H1, Lenalidomide Form-B, Tipracil HCl	
		Section-II	Capecitabine, Ibrutinib Form-A,	
11	Block IX		Imatinib Mesylate (Form-Beta), Afatinib Dimaleate, Capecitabine, Palbociclib	
Section-IV Docetaxel Trihydrate, Paclitaxel, Bendamustine Hydrochloride, R Section-VI Olaperib, Enzalutamide, Trifluridine		Docetaxel Trihydrate, Paclitaxel, Bendamustine Hydrochloride, Regorafenib		
		Section-VI	Olaperib, Enzalutamide, Trifluridine	
12	Kilo Lab		Bortezomib (Form-II), Cabazitaxel, Plerixafor, Pralatrexate	

S.No.	Mfg. Block	Section	Names of APIs being manufactured	
13	Block - F	Section-I	Bexarotene, Bicalutamide (Form-H1), Dasatinib Anhydrous, Sorafinib, Sunitinib	
		Section-II	Anastrozole, Azacitidine, Letrozole, Temozolomide, Thalidomide	
		Section-III	Cisplatin, Carboplatin, Irinotecan Hydrochloride, Melphalan, Oxaliplatin, Pomalidomide	
14	Block - L	Section-I	Busulfan	
		Section-II	Axitinib (Form-IV), Trametinib	

Manufacturing Block details for WHO API & Sartan APIs

S.No.	APIMF	API	Manufacturing block/workshop		
5.110.	AFINIF	AFI	Before FDA inspection	After FDA inspection	
1	APIMF026	Lopinavir	C & D	C & D	
2	APIMF 054	Stavudine	D	Product discontinued	
3	APIMF 098	Tenofovir disoproxil fumarate	C & E*	C & E	
4	APIMF 114	Emtricitabine	C, D & E	C, D & E	
5	APIMF 123	Lamivudine	Н	C	
6	APIMF 126	Abacavir (sulfate)	С	C	
7	APIMF 133	Zidovudine	Н	С	
8	APIMF 164	Efavirenz	D	D	
9	APIMF 184	Atazanavir monosulphate	A	A	
10	APIMF 292	Abacavir (sulfate)	С	С	
11	APIMF 297	Sofosbuvir	В	В	
12	APIMF 322	Dolutegravir Sodium	B, D & E	B, D & E	
13	APIMF 349	Daclatasvir	В	В	
		dihydrochloride			
14	APIMF368	Darunavir	A	A	
15		Valsartan	Н	Н	

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02 September – 01 October 2019

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16	 Losartan Potassium	J	J
17	 Irbesartan (Form-A)	D	Н
18	 Olmesartan Medoxomil	D	Н
19	 Candesartan	A	Product discontinued
20	 Telmisartan	C	Product discontinued

^{*} E-Block is intermediate manufactured block.

On 26 September 2019 company submitted written declaration that there is no usage of shared equipment for manufacturing process and solvent recovery between sartan & WHO PQ APIs and no impact on WHO PQ APIs for carryover / contamination of Nitrosamine impurities.

Regarding batches that were manufactured prior to the changes made to the blocks, solvent recovery and shared equipment: the risk assessment was reviewed for each WHO API.

The method that was used to test for the presence of NDMA and NDEA was provided alongside its validation report.

Overall, the risk for WHO PQ APIs that were manufactured prior changes to the process, is considered to be low and a recall is not considered to be warranted, unless any positive test results for nitrosamines are obtained in the meantime.

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

S. No.	Authority	Inspection
		months
1	EU GMP	March 2019
	(OGYEI - HUNGARY)	
2	EU GMP	January 2019
	(AIFA & AEMPS)	
3	US FDA	September 2018
		March 2017
4	WHO-Geneva	February 2017
5	PMDA Japan	December 2018
6	DCA (GMP)	May 2018

e) Most recent product quality reviews (PQRs) of the concerned WHO API(s):

Submitted for:

Lopinavir		
Stavudine		
Tenofovir disoproxil fumarate		
Emtricitabine		
Lamivudine		
Abacavir (sulfate)		
Zidovudine		
Efavirenz		
Atazanavir monosulphate		
Abacavir (sulfate)		
Sofosbuvir		



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Dolutegravir Sodium		
Daclatasvir dihydrochloride		
Darunavir		

Batch manufacturing and packaging records, including the analytical part, for the most recently released batch of relevant APIs:

Submitted for:

Lopinavir		
Stavudine		
Tenofovir disoproxil fumarate		
Emtricitabine		
Lamivudine		
Abacavir (sulfate)		
Zidovudine		
Efavirenz		
Atazanavir monosulphate		
Abacavir (sulfate)		
Sofosbuvir		
Dolutegravir Sodium		
Daclatasvir dihydrochloride		
Darunavir		

Master batch manufacturing and packaging records of the APIs of interest:

Submitted for:

Lopinavir		
Stavudine		
Tenofovir disoproxil fumarate		
Emtricitabine		
Lamivudine		
Abacavir (sulfate)		
Zidovudine		
Efavirenz		
Atazanavir monosulphate		
Abacavir (sulfate)		
Sofosbuvir		
Dolutegravir Sodium		
Daclatasvir dihydrochloride		
Darunavir		

Recalls in the past three years related to APIs with quality defects:

Name of	Date of	Total No. of	Reason for Recall
the product	Recall	Batches	
	initiation	Returned till date	



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Valsartan	16/07/2018		Complaint Investigation and recall was initiated after regulatory agency and drug product manufacturer notification for presence of NDMA impurity in Valsartan API.
Losartan Potassium	07/02/2019	12 Batches	Complaint Investigation and recall, was initiated after regulatory agency and drug product manufacturer notification for presence of NDEA impurity in Losartan Potassium API.

- Confirmation by the senior quality assurance representative that a full self-inspection or external i) audit dedicated to the API(s) has been performed and all matters dealt with: Submitted
- 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): Submitted.
- **Out-of-stock situations:** Submitted.
- Additional documents submitted: N/A

Part 5 Conclusion - Desk assessment outcome

Based on the previous WHO inspection 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 Hetero Labs Limited (Unit I), located at Survey No. 10, IDA, Kazipally, Gaddapotharam, Jinnaram Mandal Sangareddy District, Telegana, India **502110** is considered to be operating at an acceptable level of compliance with 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.

As the competent authorities (US FDA and AIFA, Italy) have yet to reach a final conclusion on the site's level of compliance, the conclusion of this desk assessment may be reassessed if new information is received from the AIFA or USFDA or another stringent regulatory authority.

Part 6 List of guidelines referenced in this inspection report

1. WHO good manufacturing practices for active pharmaceutical ingredients. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957), Annex 2. Short name: WHO GMP for APIs or TRS No. 957, Annex 2

http://apps.who.int/medicinedocs/documents/s20119en/s20119en.pdf



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2. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-eighth Report. Geneva, World Health Organization, 2014 (WHO Technical Report Series, No. 986), Annex 2. Short name: WHO GMP Guidelines or WHO TRS No. 986, Annex 2

http://www.who.int/medicines/areas/quality safety/quality assurance/expert committee/trs 986/en/

3. WHO guidance on good practices for desk assessment of compliance with good manufacturing practices, good laboratory practices and good clinical practices for medical products regulatory decisions. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-second Report. Geneva, World Health Organization, 2018 (WHO Technical Report Series, No. 1010), Annex 9. Short name: WHO TRS 1010, Annex 9

https://www.who.int/medicines/areas/quality_safety/quality_assurance/TRS1010annex9.pdf?ua=1

4. WHO Good Manufacturing Practices: water for pharmaceutical use. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-sixth Report. Geneva, World Health Organization, 2012 (WHO Technical Report Series, No. 970), Annex 2.

Short name: WHO TRS No. 970, Annex 2

http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/trs_970/en/

5. WHO guidelines for sampling of pharmaceutical products and related materials. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Thirty-ninth Report. Geneva, World Health Organization, 2005 (WHO Technical Report Series, No. 929), Annex 4.

Short name: WHO TRS No. 929, Annex 4

http://whqlibdoc.who.int/trs/WHO TRS 929 eng.pdf?ua=1

- 6. Guidelines on heating, ventilation and air-conditioning systems for non-sterile pharmaceutical products. Part 2: Interpretation of Guidelines on heating, ventilation and air-conditioning systems for non-sterile pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-third Report Geneva, World Health Organization, 2019 (WHO Technical Report Series, No. 1019), Annex 2. Short name: WHO TRS No. 1019, Annex 2 https://apps.who.int/iris/bitstream/handle/10665/312316/9789241210287-eng.pdf?ua=1
- 7. Good manufacturing practices: guidelines on validation. WHO Expert Committee on Specifications for Pharmaceutical Preparations, Fifty-third Report Geneva, World Health Organization, 2019 (WHO Technical Report Series, No. 1019), Annex 3. Short name: WHO TRS No. 1019, Annex 3 https://apps.who.int/iris/bitstream/handle/10665/312316/9789241210287-eng.pdf?ua=1
- 8. WHO Good Practices for pharmaceutical quality control laboratories. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957), Annex 1.

Short name: WHO TRS No. 957, Annex 1

http://www.who.int/medicines/publications/44threport/en/

9. WHO good practices for pharmaceutical products containing hazardous substances. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957), Annex 3.

Short name: WHO TRS No. 957, Annex 3

http://www.who.int/medicines/publications/44threport/en/

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