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## Prequalification Unit Inspection services WHO PUBLIC INSPECTION REPORT (WHOPIR) API Manufacturer

Part 1	General information
Manufacturers deta	ails
Name of	Mangalam Drugs and Organics Ltd, Unit 2
manufacturer	
Corporate address	Rupam Building, 3 <sup>rd</sup> floor, 239, P D' Mellow Road, near GPO,
of manufacturer	Mumbai 400 001, India
Inspected site	
Name & address	G.I.D.C, 3rd Phase, Plot no. 1203, Vapi, Valsad, Gujarat, 396 195, India
of inspected	
manufacturing	
site if different	
from that given	
above	
Unit / block /	Unit 2
workshop	
number	
Inspection details	
Dates of inspection	25-28 June 2022
Type of	Routine inspection
inspection	Koutine inspection
Introduction	
	Unit 2 is leasted anneximately 175K is north of Marshai Internation
Brief description of	Unit-2 is located approximately 175Km north of Mumbai Internation
the manufacturing	Airport. It consists of the following buildings:
activities	Plant 2A (Block 19) $- 3$ floors, used for the manufacture of intermediates
	API building (Block 22) $-3$ floors. Ground floor warehouse, dispensar
	sampling room. The first and second floor include two separate manufacturin
	areas (Plant 2B and 2C
	Pilot plant (Block 18)- 3 floors (Intermediate and API manufacturing), used f
	small scale batches or scale up batches.
	The facility has a separate area for the storage of solvents in drums an
	hazardous materials as well as a tank farm and a solvent recovery plant (Blo
	04).
	Quality Control facilities are housed in Block 23
	This was a multi-product manufacturing facility. No pesticides, steroid
	hormones or beta lactams were manufactured on site.
	Major changes since the last WHO inspection:
	Introduction of Corporate Quality Assurance System
	Introduction of Chromeleon Software in the laboratories
	Introduction of new equipment in production and quality control

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	Manufacture of new APIs (Amodiaquine HCl, Piperaquine Phosphate,		
	Dolutegravir Sodium, Pyronaridine Tetra Phosphate)		
General	Mangalam Drugs & Organics Ltd specializes in manufacturing active		
information about	pharmaceutical ingredients and their intermediates. It was established in 1977		
the company and	as an aromatic and speciality chemicals manufacturer and in 1996 started		
site	engaging in the manufacture of APIs and pharmaceutical intermediates. It has		
	two manufacturing facilities, namely Unit 1 and Unit 2, located at two		
	different areas, in Vapi, Valsad District, Gujarat State, India. Both units are of		
	interest to WHO PQ and it is recommended that they are consecutively		
	inspected since they operate under the same Corporate Quality Management		
	System and there is transfer of raw material and intermediates between these		
	sites.		
	This report should be read in combination with Mangalam Unit-1		
	inspection report since they both contain information on the Corporate		
	Quality Management System and observations on Corporate procedures		
	are applicable to both sites.		
History	The site was previously inspected by WHO in 2017 and by MFDS, Korea		
	in 2018. Unit-2 was periodically inspected by the Gujarat Food and Drug		
	Administration. The most recent inspection took place in September 2019.		
Brief report of insp	ection activities undertaken – Scope and limitations		
Areas inspected	Pharmaceutical Quality System		
	Documentation		
	Facilities and Equipment		
	Utilities		
	Production		
	Quality Control		
	Packaging and labelling		
Restrictions	N/A		
Out of scope	APIs out of WHO Prequalification scope		
WHO products	Lumefantrine [APIMF 100]		
covered by the	Artemether [APIMF 138]		
inspection	Amodiaquine Hydrochloride [APIMF 134]		
	Artesunate [APIMF 135]		
	Piperaquine Phosphate [APIMF 149]		
	Tenofovir Disoproxil Fumarate [APIMF 204]		
	Emtricitabine [APIMF 314]		
	Efavirenz [APIMF 318]		
	Sulfadoxine [APIMF 356]		
	Pyrimethamine [APIMF 360]		
	Dolutegravir [APIMF 386]		
	Pyronaridine Tetraphosphate [APIMF 405] Primaguine Phosphate (to be submitted to WHO PO)		
	Primaquine Phosphate (to be submitted to WHO PQ)		



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Abbreviations	Meaning	
AHU	Air handling unit	
ALCOA	Attributable, legible, contemporaneous, original and accurate	
API	Active pharmaceutical ingredient	
APR	Annual product review	
APS	Aseptic process simulation	
BMR	Batch manufacturing record	
BPR	Batch production record	
CC	Change control	
CFU	Colony-forming unit	
CIP	Cleaning in place	
СоА	Certificate of analysis	
СрК	Process capability	
DQ	Design qualification	
EDI	Electronic deionization	
EM	Environmental monitoring	
FMEA	Failure modes and effects analysis	
FPP	Finished pharmaceutical product	
FTA	Fault tree analysis	
GMP	Good manufacturing practices	
GPT	Growth promotion test	
НЕРА	High efficiency particulate air	
HPLC	High performance liquid chromatography (or high performance liquid	
	chromatography equipment)	
HVAC	Heating, ventilation and air conditioning	
IQ	Installation qualification	
LAF	Laminar air flow	
LIMS	Laboratory information management system	
MB	Microbiology	
MBL	Microbiology laboratory	
MF	Master formulae	
MFT	Media fill Test	
MR	Management review	
NC	Non conformity	
NRA	National regulatory agency	
OQ	Operational qualification	
PHA	Process hazard analysis	
PLC	Programmable logic controller	
РМ	Preventive maintenance	
PQ	Performance qualification	
PQR	Product quality review	
PQS	Pharmaceutical quality system	
PW	Purified water	



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QA	Quality assurance	
QC	Quality control	
QCL	Quality control laboratory	
QMS	Quality management system	
QRM	Quality risk management	
RA	Risk assessment	
RCA	Root cause analysis	
RO	Reverse osmosis	
SIP	Sterilization in place	
SMF	Site master file	
SOP	Standard operating procedure	
URS	User requirements specifications	
UV	Ultraviolet-visible spectrophotometer	
WFI	Water for injection	

### Part 2 Summary of the findings and comments

#### 1. Quality management

A corporate documented system of quality assurance applicable both to Unit-1 and Unit-2 was established, with corporate and site procedures covering all expected key quality elements. QA and QC departments were independent of production and were reporting to Corporate QA. Corporate QA was directly reporting to senior management. Senior management responsibilities were defined. Operations were specified in written form and GMP requirements were essentially being met. Procedures were in place for notifying responsible management of regulatory inspections, serious GMP deficiencies, product defects and related actions. The procedures that were reviewed and discussed during the inspection were generally of a satisfactory standard. Product and processes were monitored, and these results were considered during batch release. Release of finished products and salable intermediates followed the principles described in a procedure. The responsibility for release lied with the site's Head QA. A batch could not be dispatched before being released. Regular monitoring and reviews of the quality of APIs were being conducted according to documented schedules and procedures.

#### Quality risk Management (QRM)

Quality Risk Management was part of the company's Corporate Quality Assurance System and was used as quality management tool to evaluate risk in different operations and at different levels. A procedure was in place and risk assessments were incorporated among others, in handling of deviations, change management and complaints investigations. FMEA was the tool of choice for performing risk assessments. The risk assessment on the installation of new reactors and equipment in Plant 2A was reviewed. In addition, the implementation of risk management in the installation of the new GC in the laboratory was reviewed.



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# Product Quality Review (PQR)

PQRs were carried out in accordance with a Corporate procedure and consisted of a Summary report and an APQR. If no batches of the API were manufactured during the previous review period only the Summary report was compiled. PQRs had to be completed within 90 days of the end date of the review period.

PQRs of the following APIs were reviewed: Sulfadoxine Efavirenz Tenofovir Disoproxil Fumarate Dolutegravir

# 2. Personnel

Personnel in key positions were assigned with specific duties in writing. Job descriptions were compiled according to a written SOP, and they were revised every three years, unless required earlier. The job descriptions of the Unit 2 Production Manager, Block 2A Intermediate Sr. Executive, QC Sr. Manager and Stability Section Sr. Executive, were reviewed. Training of personnel was performed according to a procedure. Induction and on the job training were provided and evaluated. Annual training programs were issued based on the duties and training needs of each employee. The assessment of training was done through written questionnaires. Trainers were selected and qualified according to specific criteria and had to undergo appropriate training. The 2022 training program as well as the training records of Unit 2 Production Manager, Block 2A Intermediate Sr. Executive, QC Sr. Manager and Stability Section Sr. Executive, were reviewed.

Measures were taken to prevent unauthorized people from entering production and QC areas and appeared to be effective. Hygiene practices and gowning of the personnel, were described in written procedures. For Block 2B and 2C, a different color uniform was used.

# 3. Buildings and facilities

A tank farm was established with both underground and aboveground tanks. There was a separate building to store solvents and hazardous materials in drums. Intermediates were manufactured in Plant 2A (Block 19), a 3-storey building. The API building (Block 22) had 3 floors. On the ground floor the warehouse, dispensary and sampling room were located. The first and second floor included two separate manufacturing areas (Plant 2B and 2C). Finished product stores were temperature controlled and there were two qualified cold rooms available. Inspected workshops and facilities were in general, maintained at an acceptable level.

The manufacturing facilities were not API dedicated. Adequate ventilation, air filtration and exhaust systems were provided. Lighting in the areas visited during the inspection was considered adequate. The HVAC system provided filtered air to Grade D cleanrooms. The flow of materials and personnel through facilities were designed to prevent mix-up and cross contamination.



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## 4. Process equipment

Process equipment was not API dedicated. Additional equipment was installed in Plant 2A. Similarly, in Plant 2B two new glass reactors were installed. Materials of product contact were suitable. Reactor systems, and utilities, were installed to allow reflux, distillation and cooling required to make the APIs of interest. Tools and equipment were uniquely identified, and status labels were generally used. Similarly measuring equipment were labelled including calibration status. In general, they were maintained according to written procedures.

Preventive maintenance was described in a written SOP. Annual schedules and monthly programs were prepared for the preventive maintenance of utilities and equipment. Breakdown maintenance was performed according to a procedure. The preventive and breakdown maintenance were documented in the equipment history card. Maintenance records and history cards were checked for centrifuge CF-2B-1001, reactor RE-2B-1001 and AHU-2B-04.

# 5. Documentation and records

The documentation system was generally well established. There was an SOP in place describing the preparation, revision, review, approval, authorization, distribution, retrieval, archiving, control, maintenance, and destruction of SOPs. A draft SOP was prepared by the user and reviewed by the Head of the concerned department and site QA and finally approved by CQA. SOPs become effective after training and were revised every three years, unless otherwise necessary. Previous versions of SOPs were collected and destroyed in a controlled manner. Examples of the implementation of the procedure were spot-checked. A similar procedure was followed for the preparation, issue, review and approval of GMP related forms/templates. Documents relating to the manufacture of intermediates and APIs were prepared, reviewed, approved and distributed according to written procedures. Specifications were established for raw materials, intermediates and APIs according to a documented SOP. BMRs were retained for each batch processed.

#### 6. Materials management

There were written procedures describing the receipt, labelling, quarantine, storage, and handling of materials, as well as procedures for sampling, testing and approval or rejection of materials. With regards to quarantine labels the same practices as in Unit-1 were followed.

The SOP for dispensing and issuance of materials was reviewed. It was noted that Sodium Borohydride was stored in the main warehouse and not in the hazardous material warehouse. This was done because of the dispensing conditions and process. It was recommended that instructions on handling and storage of Sodium Borohydride and Sodium Methoxide were established.

The SOP for issuing batch numbers was discussed. The procedure was applicable for batch numbering of intermediates, APIs, and recovered solvents.



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## 7. Production and in-process controls

In general, production operations followed defined procedures. Process flows and routes of synthesis were available. Access to production premises was restricted to authorized personnel. Calibration procedures and records for scales were presented. Standard weights and their certificates were available. Closed systems and dedicated pipes were used for material transfers from reactors to centrifuges. Flexible hoses were changed on each manufacturing campaign. Examination of the flow of the manufacturing process and relevant equipment was in line with the BMRs examined during the inspection.

# 8. Packaging and identification labelling of APIs and intermediates

Intermediates were handled, as required, in dedicated containers. Examples were seen of those used for Lumefantrine. Finished products were packed in double bags and protected from light, where necessary, before being placed in their final plastic container. Coded seals were used to secure the finished product containers. QC was responsible for maintaining records for the seals used. Quarantine and release labels were issued by QC and there were approved templates for each of the labels.

## 9. Storage and distribution

Storage conditions in the warehouse were recorded and temperature was monitored. Records of incoming finished goods were maintained. Distribution of salable intermediates and APIs followed the principles described in a written SOP. Raw materials and intermediates could be transferred from Unit 1 to Unit 2 and vice versa and they followed the principles described in a procedure. Records of transfer between the two facilities were reviewed.

#### **10.Laboratory controls**

The analytical and microbiological laboratories were inspected. The premises were generally of an acceptable standard and well equipped. Documents were organized in an appropriate manner and retrieval was achieved in a timely manner.

Laboratory equipment was of an appropriate standard. Qualification and validation labels were affixed on laboratory equipment. Logbooks for equipment use were maintained.

Logbooks for sampling raw materials and finished products were presented. Analytical reports of raw materials were reviewed. Laboratory standards were prepared and handled according to a written SOP. Impurities standards were qualified according to a documented procedure.

Stability studies were carried out according to a written procedure. One batch per API manufactured within the year was placed in an ongoing stability study. The stability schedule for June 2022 was spot-checked.

In the microbiological laboratory, the record for the preparation of culture media was reviewed. Growth promotion in culture media was performed according to a documented procedure and relevant records were checked.

Out of specification results were handled according to a procedure. The investigation was performed in four different phases (Phase Ia preliminary laboratory investigation, Phase Ib



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A sampling plan for PW was in place. Alert and action limits for Total Aerobic Microbial count were established. Results were trended monthly. The May 2022 PW trend report was reviewed

## 11. Validation

The VMP was prepared based on a common corporate procedure applicable to both sites. The Unit-2 VMP was reviewed.

The VMP included the basic concepts of process validation. The procedure for performing Process Validation was discussed and especially continuous process verification. The Primaquine process validation protocol and report were reviewed in detail. The Primaquine production process was originally validated in the Pilot. A technology transfer report was available and was briefly reviewed. The company had initiated concurrent process validation in Plant 2A (intermediate) and Plant 2C (finished product) in May 2020 and was completed in May 2022.

Qualification of HVAC/AHUs was performed according to a documented procedure. Annual operational qualification included particle count measurements, differential pressure, airflow volume, air-velocity, filter integrity, containment leak test, airflow visualization, temperature, relative humidity, and microbial monitoring. The 2021 requalification of AHU-2B-04 supplying air to Plant 2B was reviewed.

In addition, the SOP on conducting analytical method validation/verification was reviewed. The Primaquine analytical method validation protocol and report for assay determination were reviewed in detail. The following parameters were tested: specificity, system precision, method precision, LoD/LoQ, accuracy/recovery, linearity, intermediate precision, robustness, ruggedness, and stability of the sample.

The blending validation protocol for Sulfadoxine was also reviewed.

#### 12. Change control and deviations

Change requests and implementation or rejection were managed in accordance with a documented procedure.

Changes related to the introduction of the Corporate Quality Assurance System, the installation of new production equipment and the qualification of new suppliers were reviewed.

Deviations were managed based on a written procedure. The logbook for registering deviations in 2021 was reviewed.

Corrective and preventive actions were initiated and monitored and reviewed based on a written procedure.



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# 13. Rejection and re-use of materials

The company had in place an SOP for recovery and usage of recovered solvents. It included a description of the operations relating to recovery of solvents based on boiling points and their use in the same stage and product. Batch numbers for recovered solvents were issued according to a procedure.

The specifications for fresh methanol and recovered methanol were compared and found similar. Purity specifications were established. The record for recovered methanol used in Lumefantrine Stage-II was reviewed.

# 14. Complaints and recalls

Complaints were registered and handled in accordance with a documented SOP. Product recalls were performed according to a written procedure which also included instructions on conducting mock recalls.

## 15. Contract manufacturers (including laboratories)

There was a procedure in place for qualifying and evaluating suppliers. Technical agreements with vendors were in place. Usually, contracts had a five-year duration. Spot checks on vendor periodic evaluation and technical agreements were performed.

	in which to be interested in the performance in the
Part 3	Conclusion – Inspection outcome

Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the observations listed in the Inspection Report, *Mangalam Drugs and Organics Ltd, Unit2* located at *G.I.D.C, 3rd Phase, Plot no. 1203, Vapi, Valsad, Gujarat, 396 195, India* was considered to be operating at an acceptable level of compliance with WHO GMP Guidelines.

All the non-compliances observed during the inspection that were listed in the full report as well as those reflected in the WHOPIR, were addressed by the manufacturer, to a satisfactory level, prior to the publication of the WHOPIR

This WHOPIR will remain valid for 3 years, provided that the outcome of any inspection conducted during this period is positive.



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#### Part 4 List of WHO Guidelines referenced in the inspection report

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http://www.who.int/medicines/areas/quality\_safety/quality\_assurance/expert\_committee/trs\_986/en/

2. 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 TRS No. 957, Annex 2

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

- 3. 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
- 4. Supplementary guidelines on good manufacturing practices: validation. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fortieth Report. Geneva, World Health Organization, 2006 (WHO Technical Report Series, No. 937), Annex 4. Short name: WHO TRS No. 937, Annex 4 http://whqlibdoc.who.int/trs/WHO TRS 937 eng.pdf?ua=1
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- 8. WHO good manufacturing practices for sterile pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 6. Short name: WHO TRS No. 961, Annex 6 http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1



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 WHO guidelines on transfer of technology in pharmaceutical manufacturing WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 7. Short name: WHO TRS No. 961, Annex 7

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- Model guidance for the storage and transport of time-and temperature-sensitive pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 9. *Short name: WHO TRS No. 961, Annex 9* http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1
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- 15. WHO Guidelines on good manufacturing practices: validation, Appendix 7: non-sterile process validation. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-ninth Report Geneva, World Health Organization, 2015 (WHO Technical Report Series, No. 992), Annex 3. Short name: WHO TRS No. 992, Annex 3 <a href="http://www.who.int/medicines/areas/quality\_safety/quality\_assurance/expert\_committee/WHO\_TRS\_992\_web.pdf">http://www.who.int/medicines/areas/quality\_safety/quality\_assurance/expert\_committee/WHO\_TRS\_992\_web.pdf</a>
- 16. WHO General guidance on hold-time studies WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-ninth Report Geneva, World Health Organization, 2015 (WHO Technical Report Series, No. 992), Annex 4. *Short name: WHO TRS No. 992, Annex 4* <u>http://www.who.int/medicines/areas/quality\_safety/quality\_assurance/expert\_committee/WHO\_TRS\_992\_web.pdf</u>



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