World Health Organization

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Prequalification Unit Inspection services
WHO PUBLIC INSPECTION REPORT
DESK ASSESSMENT OF CONTRACT RESEARCH ORGANIZATION (CRO)
WHOPIR

Part 1	**General information**
Company information	
Name of Company	Sitec Labs Ltd.
Corporate address of Company	Pee-Dee Info Tech, Plot No. Gen 40, TTC, MIDC Behind Millenium Business Park, Near Nelco Mahape Navi Mumbai - 400 710 India
Inspected sites	
Name & address of sites where the studies in the scope of this desk review assessment took place	Sitec Labs Bioanalytical facility: 2nd Floor, Building No 14, CTS No 82, 82 (1-17) Village Hariyali, LBS Marg Vikhroli (W) Mumbai, 400 083 India **This site was terminated in October 2010.** Sitec Labs Clinical & Statistical facility 1st Floor, Jayshree Plaza Near Dreams Mall, LBS Marg Bhandup (W) Mumbai 400 078 India **This site is not operating as clinical & statistical facility any longer.** Sitec Labs Pee-Dee Info Tech, Plot No. Gen 40, TTC, MIDC Behind Millenium Business Park, Near Nelco Mahape Navi Mumbai - 400 710 India
Desk assessment details	
Date of review	31 August 2020
Product and study information covered by this desk assessment	**Study no: 09-09-337** Abacavir 600 mg as Abacavir sulfate and Lamivudine 300 mg tablet

	Study no: ARL/11/228 (Only Bioanalytical part) Ritonavir 100 mg Tablets	
Part 2	**Summary of SRA/NRA inspection evidence considered (from most recent to last)**	
US FDA, USA	Dates of inspection:	16 – 20 September 2019
	Type of inspection:	FY2019 analytical BTMO program inspection
	Unit:	Bioanalytical site (Navi Mumbai, Maharashtra, 400 701)
	Type of study covered:	In vivo & In vitro studies
US FDA, USA	Dates of inspection:	19 - 22 August 2019
	Type of inspection:	A Comprehensive FY19- Premarket Original BIMO Inspection Assignment
	Unit:	Clinical site (Navi Mumbai, Maharashtra 400701), as well as Screening & Clinical laboratory (Mumbai, Maharashtra 400078)
	Type of study covered:	In Vivo Bioavailability /Bioequivalences Studies (Clinical)
MHRA, UK	Dates of inspection:	15 – 19 April 2019
	Type of inspection:	Bioequivalence Good Clinical Practice (GCP) Inspection
	Unit:	Bioanalytical & Clinical units
	Type of study covered:	Bioequivalence
Malaysian Authority (NPRA), Malaysia	Dates of inspection:	10-14 July 2017
	Type of inspection:	The first bioequivalence (BE) center Inspection on Sitec Labs Pvt Ltd
	Unit:	Clinical & Bioanalytical sites (Mahape, Navi Mumbai-4000 710)
	Type of study covered:	Bioequivalence study
Part 3	**Summary of the last WHO inspection**	
Date and conclusion of most recent WHO inspection	Sitec Labs Pvt. Ltd. Mahape was previously inspected by the WHO from 30 July to 3 August 2018. Some major findings (7) were identified in the inspection report which were addressed in the corresponding CAPA plan. The studies in the scope of the inspection were considered to be performed in compliance with WHO GCP/GLP guidelines.	
Brief description of the site's activities	Sitec Labs Pvt. Ltd is a private limited company, established in 2004, known as Sitec Labs Limited since June 2019. Sitec is located in Mahape, an industrial area of Navi Mumbai. It is divided into Bioanlytical Department and Bioclinical Section. There are dedicated areas for different activities, with a Bioclinical unit that houses 112	

	beds. The CRO is licensed for the following activities: - Contract testing laboratory - Conducting Bioavailability & Bioequivalence studies on healthy human volunteers - Development and validation of new analytical methods for national as well as international pharmaceutical companies
Areas inspected during the last WHO inspection	Clinical & Bioanalytical unit of Sitec Labs Pvt. Ltd. Mahape.
WHO product(s) and clinical trial(s) covered by the last WHO inspection	Study no: 14-11-107 Artesunate suppositories 100 mg Study no: 15-05-100 Sofosbuvir 400 mg film-coated tablet Study no: 15-03-040 Tenofovir disoproxil 245 mg (containing 245 mg of tenofovir disoproxil as fumarate, equivalent to 300 mg tenofovir disoproxil fumarate) and Lamivudine 300 mg combination film-coated tablet Study no: 15-10-180 Zidovudine and Lamivudine 300 mg/ 150 mg tablet
Abbreviations	**Meaning**
CCs	Calibration Curve standards
CAPA	Corrective and preventive action
CROMF	CRO master file
GCP	Good clinical practices
GLP	Good laboratory practices
NC	Non-conformity
NRA	National regulatory agency
QA	Quality assurance
QC	Quality control
SOP	Standard operating procedure
SRA	Stringent regulatory authority

Part 4	**Summary of the assessment of supporting documentation**

a) Clinical trial license granted by the local authority:

The sponsor Cipla is unable to locate the import license for the product used in the study no 09-09-337 since this study was conducted in 2009. The maintenance of import documentation was not part of the systems that existed during that period. However, systems have been implemented to maintain all documentation related to import license of the products used in Bioequivalence study.

b) CRO Master File:

A Site Master File authorized by Mr. Krishnan Alyer was submitted. The Site Master File was arranged in accordance with WHO Technical Report Series, No. 957, 2010 Annex 7 for Guidelines for the preparation of a contract research organization master file.

It has been noted that Sitec Labs do not have any operations at *Vikhroli* site where the bioanalytical part of study no 09-09-337 was conducted.

c) List of all regulatory inspections performed in the last 3 years and their outcome:

A list of all regulatory inspection performed in the last 3 years was provided. For more details, refer to Part 2 of this report.

d) Copy of any warning letter, or equivalent regulatory action, issued by any authority for the site:

There was no warning letter, or any equivalent regulatory action issued by any authority.

e) Confirmation by the senior quality assurance representative that a full self-inspection or external audit dedicated to the studies conducted for WHO product(s) has been performed and all matters dealt with:

A signed statement of the Quality Assurance Head is available for all studies (e.g. in-process, retrospective) along with the dates of inspections and date of reporting to the study Director and if applicable, Principal Investigator.

The Quality Assurance Statement reflects that the conduct of the study was adequately covered by the QA inspections of study conduct and conforms that the report completely reflects the raw data of the studies.

Confirmation from the Quality Assurance Unit of Sitec Labs Limited was signed on 19 Aug 2020.

f) IRB/IEC clinical trial approval (including the approved protocol, the amended protocol and consent form):

BE Study of Fixed Dose Combination of Abacavir 600 mg as Abacavir sulfate and Lamivudine 300 mg Tablet under fasting conditions was approved by Dakshata IEC.

The IEC composition was also submitted for the inspection team's review.

g) A list of any study failures in the last three years:

A list of study failures since January 2017 was submitted.

h) Additional documents submitted:

Following additional documentation was submitted and reviewed:

- List of inspections from January 2017 until August 2020
- ANVISA inspection report (Brazil) & the respective CAPA plans
- USA FDA inspection report; performed on 10 – 17 Jul 2017
- USA FDA inspection report; performed on 06 – 09 Mar 2017

- Application request for import license.
- Invoice copy for Epzicom tablets from Byron chemical Company INC. (Vendor) with Custom officer stamp and signature.
- Bill of entry of Indian Customs for Epzicom tablets.
- Correspondence Letter received from the sponsor which provides the details of shipment.
- Gate-Pass (this is a Document to register entry of goods into Sitec Labs) which provides the delivery details of the investigational product at Sitec Labs.
- Investigational product receipt form which provides the details of receipt of investigational product at Sitec Labs.
- Investigational product stock record which provides the usage and accountability of the investigational product for study 09-09-337.
- SOP for Management of Investigational product (Procurement, maintenance and handling) prevalent at the time of the study 09-09-337.

Part 5	**Conclusion – Desk assessment outcome**

Based on the previous WHO inspections and the GCP/GLP/BE evidence received and reviewed, it is considered that a desk assessment is acceptable in lieu of a WHO onsite inspection. The ***Sitec Labs Ltd*** located at ***Pee-Dee Info Tech, Plot No. Gen 40, TTC, MIDC, Behind Millenium Business Park, Near Nelco, Mahape, Navi Mumbai - 400 710; India*** is considered to have performed the studies submitted to WHO PQT under an acceptable level of compliance with WHO guidelines.

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**

1. Guidance for organizations performing in vivo bioequivalence studies. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fiftieth Report Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 9.
   Short name: WHO BE guidance or ***TRS996 Annex 9***
   http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996_annex09.pdf

2. Good clinical laboratory practice (GCLP), WHO on behalf of the Special Programme for Research and Training in Tropical Diseases. Geneva, 2009
   Short name: WHO GCLP
   https://www.who.int/tdr/publications/documents/gclp-web.pdf

3. Guidelines for good clinical practice for trials on pharmaceutical products. WHO Technical Report Series, No. 850, 1995 (pp. 97–137). ***Short name: WHO GCP***
   http://apps.who.int/medicinedocs/en/d/Js5516e/19.11.html

4. Handbook – Good Laboratory Practice (GLP): quality practices for regulated non-clinical research and development – Annex I: The OECD Principles on GLP, 2nd ed., 2009. ***Short name: OECD GLP***
   http://www.who.int/tdr/publications/documents/glp-handbook.pdf

5. Standards and operational guidance for ethics review of health-related research with human participants. Guidance Document. Geneva, World Health Organization, 2011. ***Short name: WHO Ethics Committee Guidance***
https://www.who.int/ethics/publications/9789241502948/en/

6. 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 storage and transport guidance*** or ***TRS 961 Annex 9***
http://apps.who.int/medicinedocs/documents/s18683en/s18683en.pdf

7. Guidelines for the preparation of a contract research organization master file, WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957), Annex 7.
Short name: WHO CROMF Guidelines or ***TRS No. 957, Annex 7***
http://www.who.int/medicines/publications/44threport/en/

8. Glove use information leaflet, Patient Safety, Save lives clean your hands. Geneva, World Health Organization, 2009 (revised). ***Short name: Glove use information leaflet***
http://www.who.int/gpsc/5may/Glove_Use_Information_Leaflet.pdf

9. WHO guidance on good data and record management practices. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fiftieth Report Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 5.
Short name: TRS 996 Annex 5 or ***WHO GDRMP guidance***
http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996_annex05.pdf

10. Multisource (generic) pharmaceutical products: guidelines on registration requirements to establish interchangeability. Republication of multisource (generic) pharmaceutical products: guidelines on registration requirements to establish interchangeability. WHO Technical Report Series No. 992, Annex 7 with a new appendix 2. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-first Report Geneva, World Health Organization, 2017 (WHO Technical Report Series, No. 1003), Annex 6. ***Short name: TRS 1003 Annex 6***
http://apps.who.int/medicinedocs/documents/s23245en/s23245en.pdf

11. Good chromatography practice. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-fourth Report. Geneva, World Health Organization, 2020 (WHO Technical Report Series, No. 1025), Annex 4.
Short name: WHO TRS No. 1025, Annex 4
https://www.who.int/publications-detail/978-92-4-000182-4

12. 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