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Prequalification Unit Inspection services WHO PUBLIC INSPECTION REPORT (WHOPIR)

Desk Assessment of Finished Pharmaceutical Product (FPP) Manufacturer

Part 1	General information	
Company informati	ion	
Name of	Macleods Pharmaceuticals Ltd	
Manufacturer		
Corporate address	Atlanta Arcade, Church Road, Andheri – Kurla Road Andheri (E),	
of manufacturer	Mumbai 400059, India	
Inspected site		
Name & address of	Macleods Pharmaceuticals Limited Unit II	
manufacturing site	Plot No 25-27, Survey No.366,	
manufacturing site	Premiere Industrial Estate, Kachigam,	
	Daman (U.T.) 396210, India	
	Dullium (0.1.) 370210, India	
Production	Unit II, Phases II, III, IV	
Block/Unit	,,	
Desk assessment de	tails	
Date of review	18-30 April 2024	
Products covered	Lamivudine Tablet, Film-coated 150mg	
by this desk	Lamivudine/Zidovudine Tablet, Film-coated 150mg/300mg	
assessment	Lamivudine/Tenofovir disoproxil fumarate Tablet, Film-coated	
	300mg/300mg	
	Tenofovir disoproxil fumarate Tablet, Film-coated 300mg	
	Emtricitabine/Tenofovir disoproxil fumarate Tablet, Film-coated	
	200mg/300mg	
	Efavirenz/Emtricitabine/Tenofovir disoproxil fumarate Tablet, Film-coated 600mg/200mg/300mg	
	Artemether/Lumefantrine Tablet 20mg/120mg	
	Amodiaquine (hydrochloride)/Artesunate Tablet 67.5mg/25mg	
	Amodiaquine (hydrochloride)/Artesunate Tablet 135mg/50mg	
	Amodiaquine (hydrochloride)/Artesunate Tablet 270mg/100mg	
	Pyrimethamine/Sulfadoxine Tablet, Dispersible 12.5mg/250mg	
	Pyrimethamine/Sulfadoxine Tablet, Dispersible 25mg/500mg	
	Pyrimethamine/Sulfadoxine Tablet, Dispersible+Amodiaquine	
	(hydrochloride) Tablet, Dispersible 12.50mg/250mg+76.5mg	
	Pyrimethamine/Sulfadoxine Tablet, Dispersible+Amodiaquine	
	(hydrochloride) Tablet, Dispersible 25mg/500mg+153mg	
	Ethionamide Tablet, Film-coated 250mg	
	Ethambutol hydrochloride Tablet, Film-coated 400mg	



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	Cycloserine Capsules, hard 250mg			
	Rifampicin/Isoniazid 150/75mg tab			
	Pyrazinamide Tablet 400mg			
	Ethambutol hydrochloride/Isoniazid/Pyrazinamide/Rifampicin Tablet, Film-			
	coated 275mg/75mg/400mg/150mg			
	Isoniazid Tablet 100mg			
	Isoniazid Tablet 300mg			
	Ethambutol hydrochloride/Isoniazid/Rifampicin Tablet, Film-coated			
	275mg/75mg/150mg			
	Ethambutol hydrochloride Tablet, Film-coated 100mg			
	Moxifloxacin (hydrochloride) Tablet, Film-coated 400mg			
	Rifampicin/Isoniazid 300/150mg fc tab			
	Pyrazinamide Tablet 500mg			
	Rifampicin 150mg hard cap			
	Isoniazid/Rifampicin DT 50/75mg			
	Isoniazid/Pyrazinamide/Rifampicin D	Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg		
	Cycloserine Capsules, hard 125mg			
	Rifampicin 300mg hard cap			
	Ethionamide Tablet, Dispersible 125mg			
	Ethambutol hydrochloride Tablet, Dis			
	Pyridoxine hydrochloride Tablet 10m	g		
	Pyridoxine hydrochloride Tablet 50m			
	Ethambutol hydrochloride Tablet, Film	n-coated 400mg		
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		-		
Part 2	Summary of SRA/NRA inspection e	vidence considered		
Part 2 USFDA	Summary of SRA/NRA inspection e Dates of inspection:	-		
	Dates of inspection: Type of inspection:	vidence considered 22-26.05.2023 Surveillance inspection		
	Dates of inspection:	vidence considered 22-26.05.2023		
	Dates of inspection: Type of inspection:	vidence considered 22-26.05.2023 Surveillance inspection		
	Dates of inspection: Type of inspection: Block/Unit:	vidence considered 22-26.05.2023 Surveillance inspection Phases II, III, IV		
	Dates of inspection: Type of inspection: Block/Unit: Type of products/Dosage forms	vidence considered 22-26.05.2023 Surveillance inspection Phases II, III, IV Solid dosage forms (tablets and capsules)		
USFDA	Dates of inspection: Type of inspection: Block/Unit: Type of products/Dosage forms covered:	vidence considered 22-26.05.2023 Surveillance inspection Phases II, III, IV Solid dosage forms (tablets and capsules)		
USFDA Part 3	Dates of inspection: Type of inspection: Block/Unit: Type of products/Dosage forms covered: Summary of the last WHO inspection	vidence considered 22-26.05.2023 Surveillance inspection Phases II, III, IV Solid dosage forms (tablets and capsules) on nspection during 19-22 June 2023. At		
USFDA Part 3 Date and	Dates of inspection: Type of inspection: Block/Unit: Type of products/Dosage forms covered: Summary of the last WHO inspection WHO Prequalification carried out an in	vidence considered 22-26.05.2023 Surveillance inspection Phases II, III, IV Solid dosage forms (tablets and capsules) on inspection during 19-22 June 2023. At m was informed that Phases II, III and		
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General information about the company and manufacturing site	of the QC laboratory. Building 3 included the printed carton warehouse, IT support and engineering, as well as HR offices. Buildings 4, 5 and 6 included Phase III manufacturing facilities, receipt, quarantine, sampling and approved area for raw materials and finished goods as well as the stability testing area. Building 7 consisted of the packaging area, control sample area and document storage area. Building 8 included the microbiological laboratory, QC and QA areas. The laboratories were common for all Phases. Building 9 (Phase IV) included manufacturing areas for non-Rifa oral solid dosage forms and the respective warehouse. Macleods Pharmaceuticals Limited (Macleods) manufactures and markets a wide range of pharmaceutical formulations and APIs. The headquarters are located at Andheri, Mumbai. Macleods has ten facilities: - Pharmaceutical Formulation (Unit I), Palghar (Maharashtra). - Pharmaceutical Formulation (Unit II), Daman (Union Territory). - Research & Development (R&D) Centre, Andheri (Mumbai). - Active Pharmaceutical Ingredient and Pharmaceutical Formulation (Unit V), Sarigam (Gujarat). - Pharmaceutical Formulation (Unit VI), Nalagarh (Himachal Pradesh). - Pharmaceutical Formulation (Unit IX), Sikkim - Active Pharmaceutical Ingredient (Unit X), Dahej -Bharuch (Gujarat) - Pharmaceutical Formulation (Unit IX), Daman (Union Territory). - Pharmaceutical Formulation (Unit IX), Dahej -Bharuch (Gujarat) - Pharmaceutical Formulation (Unit XI) Indore SEZ (MP). The Kachigam site is located approximately 200Km north of Mumbai. In Unit II (Phase I) only sterile API and FPP are manufactured. In Unit III
	(Phase II, III and IV) only OSD are manufactured. Some of the warehousing, sampling and QC facilities are shared.
Focus of the last	The inspection focused on Phase I and Phase II (Rifa products)
WHO inspection	The hispection rocused on r hase r and r hase if (Kita products)
Areas inspected	Documents reviewed included but were not limited: • Quality Manual – management review meetings • Organization Chart • Job descriptions for key personnel • Personnel training and hygiene • Product Quality Review • Quality Risk Management • Responsibilities of the quality unit and production • Complaints and Recalls • Deviation handling and CAPA • Change control

Macleods Pharmaceuticals Limited Unit II (Phases II, III, IV), Daman, India

18-30 April 2024



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	OOS and OOT investigations
	Material release
	Self-inspection and vendor qualification
	Validation and qualification
	Equipment calibration
	Data integrity
	Sampling and testing of materials
	Batch processing records
	Materials management system
	Analytical methods – stability
	HVAC system
	PW/WFI systems
	Areas visited:
	Starting materials, packaging materials and FPP warehouses
	Sampling and dispensing areas
	Manufacturing operations for API and FPP
	QC laboratories (Analytical and microbiological
	The inspection covered Phase I as well operations and activities related to
	Rifa products manufactured in Phase II.
Out of scope and	Products not submitted to Prequalification were excluded from the scope
_	
restrictions	of this inspection.
	-
WHO products	Phase I
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and
WHO products	Phase I
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II – Rifa Products
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II – Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II – Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II – Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II – Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg
WHO products covered by the last	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg
WHO products covered by the last WHO inspection	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II – Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB332 Rifampicin 300mg hard cap
WHO products covered by the last WHO inspection Abbreviations	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB332 Rifampicin 300mg hard cap Meaning
WHO products covered by the last WHO inspection Abbreviations AHU	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB332 Rifampicin 300mg hard cap Meaning Air handling unit
WHO products covered by the last WHO inspection Abbreviations	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB332 Rifampicin 300mg hard cap Meaning Air handling unit Active pharmaceutical ingredient
WHO products covered by the last WHO inspection Abbreviations AHU API	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB332 Rifampicin 300mg hard cap Meaning Air handling unit
WHO products covered by the last WHO inspection Abbreviations AHU API BMR	Phase I MA152 Artesunate + Sodium Bicarbonate + Sodium Chloride Powder and solvent for solution for injection 60mg + 50mg/ml + 9mg/ml Phase II - Rifa Products TB158 Rifampicin/Isoniazid 150/75mg tab TB168 Rifampicin/Isoniazid/Pyrazinamide/Ethambutol 150/75/400/275mg tab TB183 Rifampicin/Isoniazid/Ethambutol 150/75/275mg tab TB231 Rifampicin/Isoniazid 300/150mg fc tab TB259 Rifampicin 150mg hard cap TB302 Isoniazid/Rifampicin DT 50/75mg TB309 Isoniazid/Pyrazinamide/Rifampicin DT 50/150/75mg TB332 Rifampicin 300mg hard cap Meaning Air handling unit Active pharmaceutical ingredient Batch manufacturing record



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GMP	Good manufacturing practices
NC	Non conformity
NRA	National regulatory agency
PQR	Product quality review
PQS	Pharmaceutical quality system
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
SOP	Standard operating procedure

Part 4	Summary of the assessment of supporting documentation
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a) Manufacturing authorization and GMP certificate granted by the local authority:

The company provided a valid Manufacturing License and GMP certificate. These were also included in the SMF.

b) Site master file (SMF):

The company shared the SMFs for Phase I and Phases II, III, and IV prior to the on-site inspection. These documents did not give rise to any observations.

c) List of regulatory inspections performed in the last 5 years and their outcome:

This was the 8th WHO Prequalification on-site inspection. The site was regularly inspected by CDSCO. The most recent inspections by USFDA were conducted in May 2023 and in January 2019. The site had also been inspected by MHRA in December 2019. All the inspections concluded that the site was GMP compliant.

d) List of all the products and dosage forms manufactured on-site:

The list of products manufactured in Phases II, III & IV are included in Annex I of the SMF.

e) Most recent product quality review(s) (PQR)(s) of the concerned WHO product(s):

Product Quality Reviews were carried out in accordance with a written procedure using an approved template. PQRs were conducted and documented annually on a rolling basis considering one year from the start of the first batch for all approved and commercialized pharmaceutical drug products. PQRs had to be completed within two months of the due date. A PQR schedule was prepared the first two weeks of the year. PQRs were prepared regardless of the number of batches manufactured during the year, even if no batches were manufactured during the review period. Statistical tools (process capability, control charts) were applied to evaluate critical process parameters and product quality attributes. A minimum of 30 batches was necessary for statistical evaluation and batches from the 3 previous years could be used.



During the on-site inspection the following documentation was reviewed:

- Product Quality Review Plan (PQR Schedule)
- Product Quality Review Plan (PQR Schedule)
- Product Quality Review Plan for Product Not Manufactured during the Review Year
- Attachment 01 Product Quality Review Plan for Product Not Manufactured during the Review Year

Similarly, the following PQRs were reviewed:

Rifampicin/Isoniazid/Ethambutol tabs.150/75/275mg: No batches were manufactured during the review period.

Rifampicin/Isoniazid DT 75/50mg: 46 batches were manufactured during the review period.

Some observations were identified during the review of the PQR plans. CAPA were provided, and the observations were adequately addressed.

f) Batch manufacturing and packaging record(s), including the analytical part, for the most recently released batch of relevant product(s):

During the inspection spot checks on batch records were made. In general production operations followed defined procedures and records of activities were maintained. Checks on yields and reconciliation of quantities were carried out. Before processing operations were started, steps were taken to ensure that the work area and equipment were clean and free from any starting materials, products, product residues, labels or documents not required for the current operation. Environmental monitoring was conducted. Necessary inprocess controls were carried out and recorded. Similarly, before packaging operations begun, steps were taken to ensure that the work area, packaging line, printing machine and other equipment were clean and free from any products, materials or documents used previously.

During the inspection QC activities were inspected. The QC function was independent of other departments. The QC laboratories including the microbiological laboratory were separated from production areas and served all Phases. Most of the QC laboratories were located in Building 8 along with the QA area. A new microbiological laboratory was established on the 1st floor of the building while analytical and instrumental analysis took place on the 1st, 2nd and 3rd floor. Software and hardware used in the laboratory were password protected. The computer access control procedure was reviewed and more specifically the privileges for analyst, reviewer, and QA roles. Sample receiving and distribution procedure and registers were available, inspected and discussed.

The calibration/qualification procedure and the 2023 calibration plan were presented. An example of HPLC calibration/qualification was reviewed in detail. The report indicated that the following parameters were considered: pump and flow rate accuracy, gradient composition, auto sampler (linearity and accuracy), detector (noise, drift, lamp intensity, wavelength accuracy).

In addition, qualification of the fume hoods was spot-checked. The hoods were calibrated every 6 months.

The stability summary review of Rifampicin/Isoniazid DT 75/50mg was reviewed. 5 batches were included in the review manufactured during 2019-2021. All batches were placed on 24-month on-going stability studies at 25C/60%RH. For two batches the studies had been completed. Raw data indicated that all batches met their specifications at all time points.

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There was a procedure in place for registering and investigating out of specification test results in the laboratory. OOS were registered and handled in TrackWise. Examples of OOS investigations were reviewed.

g) Recalls in the past three years related to products with quality defects:

During the inspection the recall system was reviewed. Product recalls were handled according to a written SOP. This procedure described the process of withdrawing products from the market. The responsibility of recalling was assigned to the site QA, cross functional heads, corporate quality head, pharmacovigilance head, regulatory heads, and marketing and distribution head.

The depth of recall was classified into 3 levels (i.e., customer/user level, retail level and wholesale level). Mock recalls were carried out annually to test the effectiveness of the recall procedure. The mock recall protocol, for Amlodipine Besylate tablet was reviewed. The scenario included the mock recall of 14 batches of 5mg tabs and 16 batches of 10mg tabs from different customers in different countries.

Part 5 Conclusion – Desk assessment outcome

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 *Macleods Pharmaceuticals Ltd Unit 2 Phases II, III & IV* located at Plot No 25-27, Survey No.366, Premiere Industrial Estate, Kachigam, Daman (U.T.) 396210, India is considered to be operating at an acceptable level of compliance with WHO GMP guidelines.

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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