Medicines and Healthcare products Regulatory Agency

Report No: Insp GMP 36204/1375445-0001 NC

STATEMENT OF NON-COMPLIANCE WITH GMP

Exchange of information between National Competent Authorities (NCAs) of the EEA following the discovery of serious GMP non-compliance at a manufacturer

Part 1

Issued following an inspection in accordance with:
Art. 111(7) of Directive 2001/83/EC as amended
Art. 80(7) of Directive 2001/82/EC as amended

The competent authority of United Kingdom confirms the following:
The manufacturer: North China Pharmaceutical Co., Ltd
Site address: 388 Heping East Road, Shijiazhuang, Hebei, CN-050015, China

From the knowledge gained during inspection of this manufacturer, the latest of which was conducted on 2010-10-16, it is considered that it does not comply with the Good Manufacturing Practice requirements referred to in

- The principles and guidelines of Good Manufacturing Practice laid down in Directive 2003/94/EC
- The principles and guidelines of Good Manufacturing Practice laid down in Directive 91/412/EC

\[\text{The statement of non-compliance referred to in paragraph 111(7) of Directive 2001/83/EC and 80(7) of Directive 2001/82/EC, as amended, shall also be required for imports coming from third countries into a Member State.}\]
Part 2

<table>
<thead>
<tr>
<th>Human Medicinal Products</th>
</tr>
</thead>
<tbody>
<tr>
<td>Veterinary Medicinal Products</td>
</tr>
</tbody>
</table>

I NON-COMPLIANT MANUFACTURING OPERATIONS

Include total and partial manufacturing (including various processes of dividing up, packaging or presentation), batch release and certification, storage and distribution of specified dosage forms unless informed to the contrary;

<table>
<thead>
<tr>
<th>1.4</th>
<th>Other products or manufacturing activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4.3</td>
<td>Other: Manufacture of Active Pharmaceutical Ingredients(en)</td>
</tr>
</tbody>
</table>

Part 3

1. Nature of non-compliance:

This inspection identified three critical deficiencies and five major deficiencies against the EU Good Manufacturing Practices Guide Part II: Critical: Buildings and facilities were inadequate. The process solvent used at final API stage was contaminated. The site was being contaminated with biomass from the Phenoxymethylpenicillin Potassium (Penicillin V) fermentation. Major: The handling of drums, hoses and pipe work introduced contamination to the process. Process validation was inadequate. There was no system to control out of specification batches that had been merged. The maintenance and management of cell banks was inadequate. Commitments from the last EDQM inspection had not been adequately completed.

Action taken/proposed by the NCA

Requested Variation of the marketing authorisation(s)

Removal of the North China Pharmaceutical sites from Marketing Authorisations related to Phenoxymethylpenicillin Potassium, Oxytetracycline HCl and Oxytetracycline dihydrate.

Recall of batches already released

No batch recalls have been required.

Prohibition of supply

All current stock for veterinary products will not be supplied and no part manufactured veterinary product will be progressed for release.

Suspension or voiding of CEP (action to be taken by EDQM)

The following certificates of suitability have been suspended: CEP 2006-019 – Phenoxymethylpenicillin Potassium CEP 1999-162 – Oxytetracycline HCl CEP 1997-127 Oxytetracycline dihydrate the North China Pharmaceutical site has been removed from this CEP.

Additional comments

This site is not suitable for supply of any other APIs for EU products due to the risk of contamination with Phenoxymethylpenicillin Potassium.
<table>
<thead>
<tr>
<th>Products manufactured at site, if known</th>
<th>Products</th>
<th>Dosage Form</th>
<th>Reference Member State, National or EMA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Human Medicinal Products</strong></td>
<td>Phenoxy methyl penicillin potassium</td>
<td>API</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Oxytetracycline HCl</td>
<td>API</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Oxytetracycline dihydrate</td>
<td>API</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Veterinary Medicinal Products</strong></td>
<td>Phenoxy methyl penicillin potassium</td>
<td>API</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Oxytetracycline HCl</td>
<td>API</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Oxytetracycline dihydrate</td>
<td>API</td>
<td>N/A</td>
</tr>
</tbody>
</table>

2010-12-17

Name and signature of the authorised person of the Competent Authority of United Kingdom

Confidential
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