Australian Government

Department of Health
Therapeutic Goods Administration

[redacted]
South Eastern Sydney Local Health District
Level 1 North Block
Sydney/Sydney Eye Hospital
8 Macquarie St
Sydney NSW 2000
Ref: 2016/027968

**RE: The Therapeutic Goods Act 1989**
**Inspection of: South Eastern Sydney Local Health District Macquarie Street Sydney**

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**Manufacturers Licence Number: MI-2013-LI-00831-1**

Dear s22 [redacted],

I would like to thank you and the management and staff for the courtesy and attention extended during the inspection conducted at your Sydney, NSW site on 14-17 November, 2017.

During the inspection, a number of inspection findings listed as deficiencies in the appendix to this letter have been identified that indicate a departure from acceptable GMP standards, and these items require prompt resolution. You are requested to respond to the deficiencies recorded below within four (4) weeks from the date of this letter. A standard form (in Word) to prepare the response has been issued with this letter. The preferable format for your response is:

- For the response form (Close out record): as a Word document that is not marked as final;
- For all other documents: in any searchable electronic format, e.g. PDF.
- For all deficiencies categorised as 'critical' or 'major' a CAPA plan should be submitted that includes root cause analysis, corrective action/s to the root cause, preventative action/s to the root cause, corrections to observed examples, and due date for completion of actions.
- For the deficiencies categorised as 'other', a CAPA is not required; however, the response date, the correction and due date for completion are required to be provided.

All correspondence regarding the inspection should be addressed to me at the email address below.

PO Box 100 Woden ACT 2606 ABN 40 939 406 804
Phone: 02 6232 8444 Fax: 02 6232 8605 Email: info@tga.gov.au www.tga.gov.au

TGA Health Safety Regulation

Yours sincerely

s22 [redacted]

*(Signed electronically; contains no visible signature)*

s22 [redacted]
Manufacturing Quality Branch

Date: XX/12/2017

[redacted]@health.gov.au

**Brief report of the inspection activities undertaken**

**Scope of inspection**

The scope of the inspection was to review compliance with the requirements of the Australian Code of GMP for Human Blood and blood components, human tissues and human cellular therapy products – 2013 for the proposed manufacturing steps listed on the manufacturer's licence, namely:

- Human Tissue, Musculoskeletal tissue:
  - Retrieval
  - Storage
  - Processing
  - Release for supply

- Human Tissue, Fresh Frozen Bone:
  - Retrieval
  - Storage
  - Processing
  - Release for supply

- Human Tissue, Ocular Tissue:
  - Retrieval
  - Storage
  - Processing
  - Release for supply

And on the variation application, tracking number MI-2017-LI-07144-1, namely:

- Human Tissue, Amnion Tissue:
  - Retrieval
  - Storage
  - Processing
  - Release for supply

- Human Tissue, Skin Tissue:
  - Retrieval
  - Storage
  - Processing
  - Release for supply

**List of Deficiencies observed during the inspection**

**Critical deficiencies:**
None observed

**Major deficiencies:**

1. The requirements of Clause 107 that corrective or preventive action should be taken to eliminate the cause of nonconformities in order to prevent recurrence or occurrence were not met as the investigation into DISC-17/648 that had been instigated by a number of recalls had as an outcome an "action plan" that did not address the need for primary input of an

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experienced and qualified physician in determining and reviewing the causality of the adverse events.

[redacted]

**Commented [redacted]:** I am not sure as the requirement lies a lot in the PV space

**Commented [redacted]:** Maybe consider 704 here as well? There is not really a code requirement as to who performs the investigation? I think maybe an other deficiency would be better – perhaps linked to the procedure?

**Other deficiencies:**

[redacted]

**DEFINITIONS**

**Marketing Authorisation**

Compliance with regulatory requirements specified on the ARTG and any other requirements imposed by a relevant Delegate of Secretary upon product listing or registration.

Examples of regulatory requirements include but not limited to the following: compliance with registered formulations, special storage and transportation conditions, shelf life, labelling, batch release testing requirements etc.

**Critical Deficiency**

A deficiency in a practice or process that has produced, or may result in, a significant risk of producing a product that is harmful to the user. Also occurs when it is observed that the manufacturer has engaged in fraud, misrepresentation or falsification of products or data.

**Major Deficiency**

A non-critical deficiency that:

- has produced or may produce a product which does not comply with its marketing authorisation; and/or
- indicates a major deviation from the Code of GMP; and/or
- indicates a major deviation from the terms of the manufacturing licence or GMP approval (overseas manufacturers); and/or
- indicates a failure to carry out satisfactory procedures for release of batches; and/or
- indicates a failure of the person responsible for QA/QC to fulfil his/her duties; and/or
- consists of several other deficiencies, none of which on its own may be major, but which may together represent a major deficiency and should be explained and reported as such.

**Other Deficiency**

A deficiency that cannot be classified as either critical or major, but indicates a departure from good manufacturing practice.

A deficiency may be "other" either because it is judged as minor, or because there is insufficient information to classify it as major or critical.

One-off minor lapses or less significant issues are usually not formally reported, but are brought to the attention of the manufacturer.

**Note:**

1. Classification of a deficiency is based on the assessed risk level and may vary depending on the nature of products manufactured, e.g in some circumstances an example of major deficiency may be categorised as critical.
2. A deficiency that was reported at a previous inspection and not corrected may be reported in a higher classification.