

# SoCalBio Regulatory Workshop

## Recent Trends in FDA Inspections

### Contract Manufacturing Operations CMOs

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## CMO's

- **Economic Conditions Favorable to CMO's**
- **CMO growth expected to be >15% yearly over next 5 years**



# CMO's

- **FDA Inspections**
  - **Clinical**
  - **Commercial**
- **Ca FDB Inspections**
- **Client Inspections**



# Clinical Inspections

- **Not required at Sponsors**
- **Optional for clinical-only CMO**
- **Voluntary inspection program**
- **“For Cause”**



**Regulatory Expectations**

**Type V DMF for Filing**

**Type II BBMF for manufacturing**

**FDB License**



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**Systems Based Inspections**

**Vs.**

**Pre Approval Inspections**



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Quality Systems  
(QA)

Facilities and  
Equipment

Production  
Controls

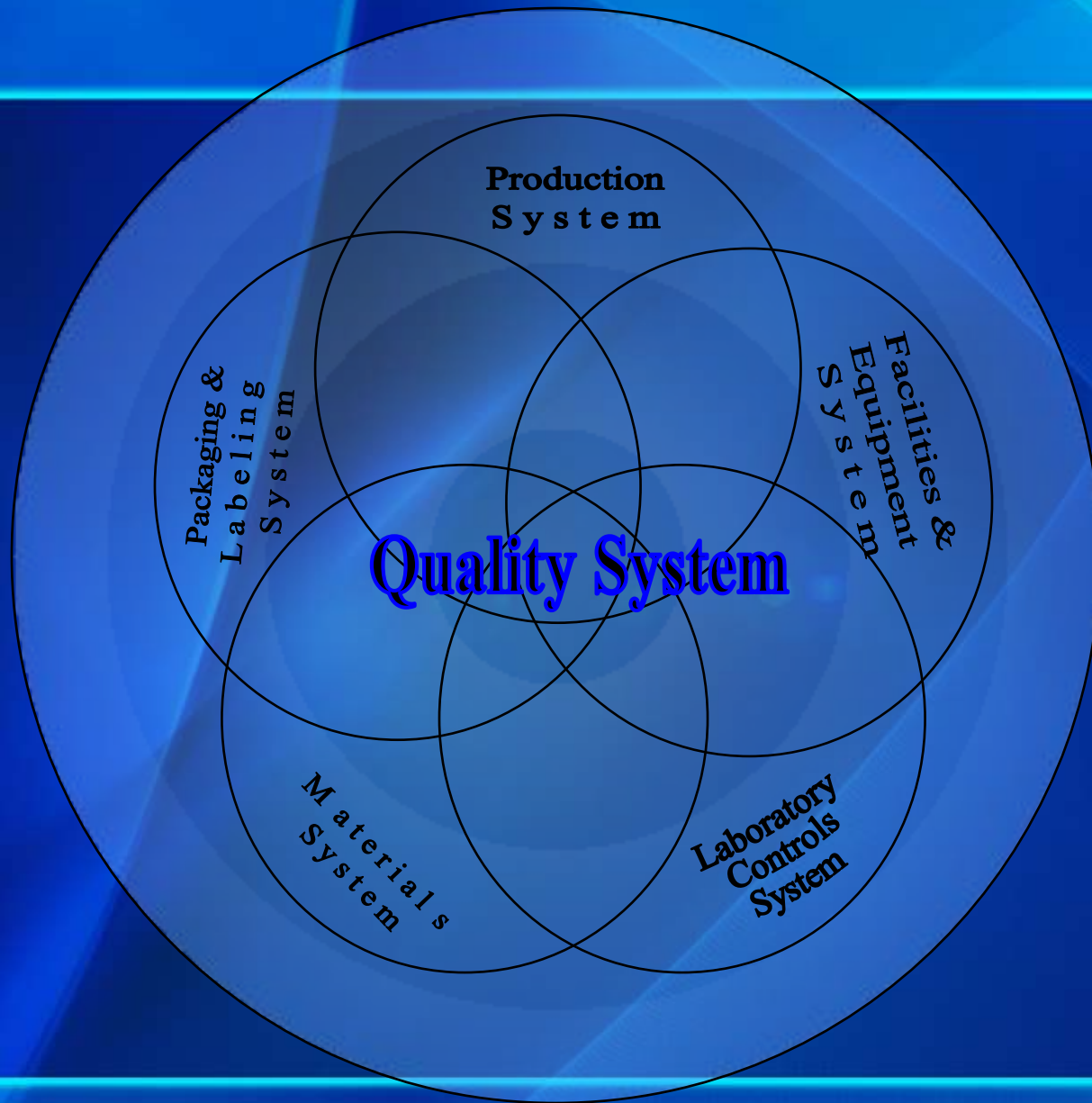
Laboratory  
Controls

Packaging and  
Labeling

Warehouse



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# **Systems Based Inspections**

- After PAI, return visits may focus on Quality Systems and only 2 others**

- Regardless of the party performing a manufacturing step, adequate control over manufacturing is maintained
- Ultimately the applicant is responsible for all manufacturing, testing, and quality aspects of the product
- There should be lot-to-lot consistency of the product through a controlled process, regardless of the site of manufacture



## **Pre-Approval Inspections**

- Generated by a NDA, BLA or CBE**
- Product Specific**
- If facility already has FDA clinical inspections, PAI may be abbreviated**
- Team of Product Reviewer, General Inspectors and District Office**



# Pre-Approval Inspections

- 5 Days or more
- All 6 Systems Covered



# Most Recent Code Violations –

## Warning Letters

21CFR211.192      **Deviation investigations**

21CFR211.22      Quality unit

21CFR211.100  
Written procedures (process and production controls)

21CFR211.160  
Laboratory controls

21CFR211.67  
Equipment cleaning & maintenance



# Most Recent Code Violations

21CFR211.113

Control of microbial contamination

21CFR211.42

Design/construction of facilities

21CFR211.165

Testing and release for distribution

21CFR211.166      Stability testing

21CFR211.25

Personnel qualifications and training



# Strategies For Success

## -Automated Audit System

- Tracks requests
- Generates reports
- Notifies Area Experts
- Generates cover pages
- Removes the “Runnner”



# Inspection Prep

- **Flow Diagrams wherever possible**
- **Product, Air, Personnel, Waste**
- **Routing of Documents**
- **Procedures**



# Inspection Prep

- **Experts Identified, with backups**
- **Audit staff Identified, Trained, Backups**
- **Rehearsal of Questioning**
- **Mock Inspections**
- **Scheduling of Activities**



**THANK YOU!**



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