**Subpart E - Control of Components and Drug Product Containers and Closures**

**(21 CFR 211.80 – 211.94)**

**211.80 General requirements.**

**211.82 Receipt and storage of untested components, drug product containers, and closures.**

**211.84 Testing and approval or rejection of components, drug product containers, and closures.**

**211.86 Use of approved components, drug product containers, and closures.**

**211.87 Retesting of approved components, drug product containers, and closures.**

**211.89 Rejected components, drug product containers, and closures.**

**211.94 Drug product containers and closures.**

**Your firm failed to establish and follow written procedures describing in sufficient detail the receipt, identification, storage, handling, sampling, testing, and approval or rejection of components and drug product containers and closures (21 CFR 211.80(a)).**

Your firm approved "(b)(4)" for use as a component in your drug products. For example, "(b)(4)" is approximately (b)(4)% of your (b)(4) drug product. At a minimum, you must use (b)(4) (refer to USP (b)(4)) to manufacture your non-sterile drug products. (b)(4) must be suitable for its intended use and routinely tested to ensure ongoing conformance with appropriate chemical and microbiological attributes.

In your response, you indicate that you will discontinue the use of "(b)(4)" and procure and use only (b)(4) that meets USP (b)(4) specifications. You also state that you will initiate contract testing of your current (b)(4) supply for microbiological and chemical quality. Your response is inadequate because you failed to address drug products currently on the market that were manufactured using "(b)(4)".

**Your firm failed to conduct at least one test to verify the identity of each component of a drug product (21 CFR 211.84(d)(1)).**

Based on the records and information you provided, you did not demonstrate that you adequately performed identity testing on incoming components including, but not limited to, **(b)(4)**, which are at high-risk of **(b)(4)** contamination. Identity testing for these and certain other high-risk drug components includes a limit test in the United States Pharmacopeia

(USP) to ensure that the component meets the relevant safety limits for levels of **(b)(4)**. Because you did not perform sufficient identity testing, you failed to assure the acceptability of these components for use in manufacture of your drug products.

The use of ingredients contaminated with **(b)(4)** has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document **(b)(4)**.

In your initial response, you state that you or your contract laboratory performed identity testing on each shipment of each lot of components before they were released for use in manufacturing. On June 23, 2025, FDA specifically requested that you provide the test data; however, in response to this communication you failed to provide any records demonstrating that you tested your incoming components before use in manufacturing.

Without adequate testing, you do not have scientific evidence that incoming components conform to appropriate specifications prior to use in the manufacture of your drugs. As a manufacturer, you have a responsibility to sample, test, and examine incoming materials before use in production to assure adequate quality.

Your firm failed to adequately test your incoming components for identity before using the components to manufacture your OTC drug products. Specifically, your firm did not perform identity testing for the following raw materials: **(b)(4)**, which are used in the production of **(b)(4)** batch **(b)(4)**.

We also note that you use raw material **(b)(4)** to manufacture your OTC drug products. However, testing for the presence of methanol is not performed for incoming **(b)(4)**.

The use of **(b)(4)** contaminated with methanol has resulted in various lethal poisoning incidents in **(b)(4)**.

Without adequate testing, you do not have scientific evidence that your raw materials conform to appropriate specifications before their use in the manufacture of your drug products. As a manufacturer, you have a responsibility to sample, test, and examine drug components before their use in production to ensure adequate quality.

In your response, you commit to updating testing specifications and prioritizing the identity testing of raw materials on order for the remaining production planned in 2025. You also commit to ensuring that every **(b)(4)** container delivered will be tested for methanol by July 31, 2025.

Your response is inadequate. You did not provide a risk assessment addressing the use of untested raw material in your finished OTC products. In your response, you did not commit to testing the remaining raw materials or the retain samples of the OTC drug products already distributed.

**Your firm failed to test samples of each component for identity and conformity with all appropriate written specifications for purity, strength, and quality. Your firm also failed to validate and establish the reliability of your component supplier's test analyses at appropriate intervals (21 CFR 211.84(d)(1) and 211.84(d)(2)).**

Your firm failed to adequately test incoming components, including active pharmaceutical ingredients (APIs), for identity before using them in the manufacture of your drug products. Additionally, your firm released APIs for use based on your supplier's certificates of analysis (COAs) without establishing the reliability of your suppliers' test analyses at appropriate intervals. Furthermore, you did not demonstrate that you adequately performed identity testing on incoming glycerin, which is at high-risk of diethylene glycol (DEG) or ethylene glycol (EG) contamination.

In your response, you state a procedure will be developed to ensure incoming active ingredients will be tested by an external or internal laboratory. You also commit to developing a plan to test glycerin for DEG and EG content.

Your response is inadequate. You lack evidence that your current raw material inventory conforms with identity requirements and all other appropriate specifications. You also lack sufficient detail describing how you will qualify your suppliers and validate their COAs. Furthermore, you did not provide a retroactive risk assessment of distributed products containing components at high-risk for DEG or EG contamination.

Your firm failed to conduct adequate identity testing on incoming components, including active pharmaceutical ingredients, used in the manufacturing of your drug products. Additionally, you relied on your suppliers' certificates of analyses (COA) without establishing the reliability of each of your component suppliers' analyses at appropriate intervals.

Without adequate testing and confirmation of reliability of supplier test results, you lack scientific evidence that the components conform to appropriate specifications prior to use in the drugs products you manufacture.

Your firm failed to test incoming raw materials including active pharmaceutical ingredients (e.g., (b)(4)) used to manufacture your drug products to determine their identity, purity, strength, and other appropriate quality attributes. You released (b)(4) USP lots into production without performing adequate acceptance testing, including identity. In addition, you relied on your suppliers' certificate of analysis (COA) without establishing the reliability of each of your component suppliers' test analyses at appropriate intervals.

In your response, you state that you will immediately withhold all incoming lots of (b)(4) USP and other raw ingredients pending sampling, testing, and approval by the quality control unit. Your response is inadequate because you do not provide details to demonstrate that your components meet all compendial requirements (e.g., specific tests to be

performed). Additionally, you do not propose testing retain samples or otherwise conducting an analysis of previously used (b)(4) USP lots as well as other drug product components to ensure that all quality attributes are met.

Without adequate testing, you do not have scientific evidence that the components conform to appropriate specifications before their use in the manufacture of your drug products. You are responsible for sampling, testing, and examining drug components before use in production to ensure that acceptable quality parameters are met.

Your response to our request for records and other information under section 704(a)(4) indicated that you did not adequately test the identity of incoming components used in the manufacture of your drug products. You also did not demonstrate that you are testing your active ingredient **(b)(4)** for **(b)(4)**.

Without adequate testing you do not have scientific evidence that your raw materials conform to appropriate specifications prior to use in the manufacture of your drug products. As a manufacturer, you have a responsibility to sample, test, and examine drug components before use in production to assure adequate quality, including testing for the presence of **(b)(4)** in **(b)(4)**.

The use of **(b)(4)** contaminated with **(b)(4)** has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document **(b)(4)**.

Your firm manufactures OTC topical analgesic drug products without adequate assurance of the quality of raw materials. For example, you did not test incoming components, such as your active pharmaceutical ingredients, for identity before using them in the manufacture of your drug products. Additionally, you relied on your suppliers' COAs without establishing the reliability of each of your suppliers' analyses at appropriate intervals.

Without adequate testing, you do not have scientific evidence that your raw materials, including but not limited to active pharmaceutical ingredients, conform to the appropriate specifications before their use in the manufacture of your drug products. As a manufacturer, you are responsible for sampling, testing, and examining drug components before their use in production to ensure adequate quality.

Your firm also used **(b)(4)** from an external source as a component in your finished drug products without conducting adequate testing to ensure it consistently meets the **(b)(4)**, United States Pharmacopeia (USP) monograph specifications and appropriate microbial limits.

Because **(b)(4)** is used as a component in your nonsterile drug products, the lack of data regarding the quality of your incoming **(b)(4)** poses a potential risk of introducing objectionable microbial contamination into your products. **(b)(4)** purposes must be suitable for its intended use and tested to ensure ongoing conformance with appropriate chemical and microbiological attributes.

In your response, you state you created SOPs for raw material receipt, quarantine, sampling, testing, handling, and approval. You also state you implemented raw material testing at a third-party laboratory and implemented testing for your **(b)(4)**, including testing for **(b)(4)**.

Your response is inadequate. You do not provide raw material specifications, test results, and copies of your SOPs for testing raw materials, including **(b)(4)**. You also fail to provide sufficient details demonstrating how you qualified the contract laboratory used for testing raw materials. In addition, your response does not state if you plan to perform retrospective testing for all lots of components already used to manufacture your drug products, and if you plan to establish the reliability of each of your suppliers' analyses.

**Your firm failed to conduct at least one test to verify the identity of each component of a drug product. (21 CFR 211.84(d)(1))**

Based on the records and information you provided, you did not demonstrate that you tested the identity of incoming components including **(b)(4)** used to manufacture your OTC drug products. For example, your February 26, 2025, response states that you do not perform identity testing for your components before use in manufacturing.

You also did not provide evidence that the **(b)(4)** you use to manufacture your drug products meets USP limits for **(b)(4)**. See FDA's guidance document **(b)(4)**.

Without adequate testing, you do not have scientific evidence that your components conform to appropriate specifications prior to use in the manufacture of your drug products.

Your firm repeatedly failed to adequately perform identity testing of incoming high-risk components for (b)(4) contamination. In response to our December 15, 2023, FDA Warning Letter 320-24-13 pertaining to the 704(a)(4) records request, you committed to updating your specifications and ensuring robust and documented testing procedures for each high-risk component, including but not limited to (b)(4) solution, used in the manufacture of your OTC (b)(4) drug products. During our recent inspection, we found your practices continued to be inadequate, in that:

- You continued to use the Indian Pharmacopoeia (IP-(b)(4)) specification for (b)(4) solution which did not require impurities or identity testing for (b)(4).
- You have not updated sampling procedures to ensure that sampling was properly documented and adequately represented each shipment of each lot of high-risk components.
- You affirmed that the methods used by your third-party lab to perform identity testing are neither validated nor verified.

Your responses are inadequate and demonstrate a failure to meet commitments. In your response to Warning Letter 320-24-13, you claimed that testing would be implemented. In your August 2025 response you reiterate previous commitments, stating that you will initiate validation/verification of all analytical methods using ICH guidelines and that USP-

compliant (b)(4) testing protocols will be adopted. Your current response is inadequate because you did not provide timeframes for completion, documented method validation, and an updated specification with sampling plan to ensure the quality of your high-risk components.

The use of ingredients contaminated with (b)(4) has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document (b)(4) to help you meet the CGMP requirements when manufacturing drugs containing ingredients at high-risk for (b)(4) contamination at (b)(4).

**Your firm failed to conduct at least one test to verify the identity of each component of a drug product. Your firm also failed to validate and establish the reliability of your component supplier's test analyses at appropriate intervals (21 CFR 211.84(d)(1) and 211.84(d)(2)).**

Your firm failed to perform adequate testing for your raw materials that were used to manufacture the following:

- OTC (b)(4) and (b)(4) drug products
- Specially (b)(4), an in-process material used in (b)(4) prescription drug products

For example, you did not adequately test for identity of each incoming shipment of each lot of raw materials (e.g., (b)(4)) used in the manufacture of your OTC drug products, drug components, and in-process material. In addition, you relied on your suppliers' certificates of analysis (COAs) without establishing the reliability of your component suppliers' test analyses at appropriate intervals.

Products Containing (b)(4)

Your firm failed to adequately test for (b)(4) in your incoming component (b)(4) used as an active pharmaceutical ingredient (API) and as a component in an in-process material. The use of (b)(4) contaminated with (b)(4) has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document (b)(4)

Products Containing (b)(4)

Your firm also failed to adequately test your incoming components at high risk of (b)(4) contamination for identity before using them to manufacture your drug products and in-process material. This includes, but is not limited to, testing of (b)(4) to determine its appropriate identity, prior to use in manufacturing your OTC (b)(4) drug products and in-process material for prescription drug products.

Identity testing for (b)(4) and certain other high-risk drug components includes a limit test in the United States Pharmacopeia (USP) to ensure the component meets the relevant safety limits for (b)(4) levels. Because you did not perform identity testing on each shipment of each lot using the USP identification test that detects these hazardous impurities, you failed to

assure the acceptability of these components for use in the manufacture of your drug products and in-process material.

The use of ingredients contaminated with (b)(4) has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document (b)(4)

In your response, you state that you will develop a test method and/or use a contract testing laboratory to test incoming (b)(4) for (b)(4) and incoming high risk drug components, including but not limited to, (b)(4) for (b)(4). Your response is inadequate because you do not provide adequate details that ensure identity testing for raw materials will meet all USP monograph requirements.

**Your firm failed to test samples of each component for specific identity and conformity with all appropriate written specifications for purity, strength, and quality (21 CFR 211.84(d)(1) and 211.84(d)(2)).**

Your firm manufactures over-the-counter (OTC) drug products, such as **(b)(4)**. You failed to perform adequate identity testing on each incoming component lot used in the manufacture of your drug products, including for **(b)(4)** and the active ingredient **(b)(4)**.

**(b)(4)**

Your firm's incoming component testing for **(b)(4)** consists of evaluating appearance and microbiological attributes but does not include adequate identity tests, such as spectroscopic identification, limits for **(b)(4)**, and chromatographic comparison to the retention time of a standard. You did not test the incoming component, **(b)(4)**, for the presence of **(b)(4)** contamination prior to using in your drug products. Additionally, based on documentation you provided during the inspection, your firm accepted and used several lots of an incorrect excipient, **(b)(4)**, instead of the specified **(b)(4)** as described in your formulation, and subsequently used these **(b)(4)** lots in the manufacture of your drug products. Adequate incoming material controls should have identified the incorrect excipient, so that your quality unit could have prevented its use in the drug products.

The use of ingredients contaminated with **(b)(4)** has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document **(b)(4)** to help you meet the CGMP requirements when manufacturing drugs containing ingredients at high-risk for **(b)(4)** contamination at **(b)(4)**.

**(b)(4)**

The United States Pharmacopeia (USP) monograph describes **(b)(4)** as a **(b)(4)**. You received and used **(b)(4)** that contained greater than **(b)(4)** based on the supplier's certificate of analysis (COA) and your own internal specification for the manufacture of your drug product. This material does not conform with the USP monograph.

**Your firm failed to test samples of each component for identity and conformity with all appropriate written specifications for purity, strength, and quality. Your firm also failed to validate and establish the reliability of your component supplier's test analyses at appropriate intervals (21 CFR 211.84(d)(1) and 211.84(d)(2)).**

You failed to perform adequate identity testing on each shipment of each lot of incoming components (e.g., **(b)(4)**) used in the manufacture of your drug products. In addition, you relied on your suppliers' certificate of analysis (COA) without establishing the reliability of each of your component suppliers' analyses at appropriate intervals.

**(b)(4)**

You failed to adequately test each shipment of each lot of **(b)(4)**, which you used as inactive ingredients in your drug products, for **(b)(4)** contamination. Complete identity testing for **(b)(4)**, and certain other high-risk drug components includes a limit test in the USP to ensure that the component meets the relevant safety limits for levels of **(b)(4)**. Because you did not perform identity testing on each shipment of each lot using the USP identification test that detects these hazardous impurities, you failed to ensure the acceptability of these components for use in the manufacture of your drug products.

The use of ingredients contaminated with **(b)(4)** has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document to help you meet the CGMP requirements when manufacturing drugs containing ingredients at high-risk for **(b)(4)** contamination at **(b)(4)**.

In your response, you state that you have conducted a retrospective analysis and intend to have a qualified independent laboratory perform additional analysis. However, you fail to show that the retrospective testing meets full USP compendial requirements for ingredients at high risk for **(b)(4)** contamination. You also fail to show that the **(b)(4)** you tested from your current inventory are fully representative of the component lots you used in your drug products that remain within expiry.

Without adequate testing, you do not have assurance that components conform to appropriate specifications prior to use in the drug products you manufacture. As a manufacturer, you have the responsibility to sample, test, and examine drug components before use in production to assure adequate quality.

You failed to conduct adequate identity testing on incoming components used in the manufacture of your over-the-counter (OTC) drug products. For example, you failed to adequately test each shipment of each lot of **(b)(4)** for **(b)(4)**.

See FDA's guidance for industry **(b)(4)**.

Identity testing for the high-risk drug component **(b)(4)** includes a limit test in the United States Pharmacopeia (USP) to ensure the component meets the relevant safety limits for **(b)(4)**. Because you did not perform adequate identity testing using the USP identification test that detects this hazardous impurity, you failed to ensure the acceptability of the component for use in the manufacture of your drug products.

Additionally, you relied on your suppliers' Certificates of Analysis (COAs) without establishing the reliability of each of your component supplier's test analysis at appropriate intervals.

In your response, you state that you will establish or revise raw material specification sheets for appropriate comprehensive testing of all incoming materials, and you will review your program for periodically validating supplier COAs for all raw materials.

Your response is inadequate because it does not provide sufficient details to ensure adequate remediation of your incoming materials testing program, and it lacks a retrospective review, analysis, and risk assessment for previously distributed drug products that are within expiry.

Without adequate testing and confirmation of the reliability of supplier test results, you lack scientific evidence that the components used in your drug products conform to appropriate specifications before their use in the drug products you manufacture.

You failed to perform adequate identity testing on each shipment of each lot of incoming components (for example, **(b)(4)**) used in the manufacture of your homeopathic drug products. Your firm's testing was limited to Identification **(b)(4)** (specific gravity) and you failed to adequately test your incoming component **(b)(4)**, used as an active pharmaceutical ingredient (API), for **(b)(4)**. In addition, you relied on your suppliers' certificates of analysis (COAs) without establishing the reliability of your component suppliers' test analyses at appropriate intervals.

*Products containing* **(b)(4)**

You manufacture multiple drugs that contain **(b)(4)**. The use of **(b)(4)** contaminated with **(b)(4)** has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document **(b)(4)**.

In your response, you stated that your firm was not following the current United States Pharmacopeia (USP) requirements for **(b)(4)** identification testing. USP pharmaceutical standards are applicable to drugs, including drug components, such as **(b)(4)**, of finished pharmaceuticals, per section 501(b) of the FD&C Act.

Your response is inadequate. It does not provide sufficient details about how you will establish the reliability of your component suppliers' COAs at appropriate intervals. Furthermore, it does not indicate you will perform the required testing for each lot of

incoming raw materials. Your response also lacks an appropriate and thorough risk assessment of the quality of previously distributed drug products that are within expiry.

You failed to perform adequate identity testing on each shipment of each lot of incoming components (e.g., benzalkonium chloride, ethanol, glycerin) used in the manufacture of your OTC drug products. In addition, you relied on your suppliers' certificate of analysis without establishing the reliability of each of your component suppliers' test analyses at appropriate intervals.

Identity testing for high-risk drug components ethanol and glycerin include a limit test in the United States Pharmacopeia (USP) to ensure the component meets the relevant safety limits for methanol or diethylene glycol (DEG) or ethylene glycol (EG) levels, respectively. Because you did not perform identity testing on each shipment of each lot using the USP identification test that detects these hazardous impurities, you failed to assure the acceptability of these components for use in the manufacture of your drug products.

**Ethanol**

You failed to adequately test each shipment of each lot of ethanol, used as an active pharmaceutical ingredient, for methanol. The use of ethanol contaminated with methanol has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document Policy for Testing of Alcohol (Ethanol) and Isopropyl Alcohol for Methanol at: https://www.fda.gov/regulatory-information/search-fda-guidance-documents/policy-testing-alcohol-ethanol-and-isopropyl-alcohol-methanol.

**Glycerin**

You failed to adequately test each shipment of each lot of glycerin, used as an inactive ingredient, for DEG or EG contamination.

The use of ingredients contaminated with DEG or EG has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document *Testing of Glycerin, Propylene Glycol, Maltitol Solution, Hydrogenated Starch Hydrolysate, Sorbitol Solution, and Other High-Risk Drug Components for Diethylene Glycol and Ethylene Glycol* to help you meet the CGMP requirements when manufacturing drugs containing ingredients at high-risk for DEG or EG contamination at https://www.fda.gov/regulatory-information/search-fda-guidance-documents/testing-glycerin-propylene-glycol-maltitol-solution-hydrogenated-starch-hydrolysate-sorbitol.

In your response, you commit to full USP compendial testing of raw materials from your vendors, including methanol testing for ethanol and DEG/EG for glycerin. Your response is inadequate. You failed to specify the timing for implementation of testing and how you intend to sample and monitor incoming materials. Further, you did not evaluate previously distributed drug products or describe how suppliers will be qualified.

Without adequate testing, you do not have appropriate assurance that components conform to appropriate specifications prior to use in the drug products you manufacture. As a manufacturer, you have the responsibility to sample, test, and examine drug components before use in production to assure adequate quality.

Your firm failed to conduct adequate identity testing on incoming components, including active pharmaceutical ingredients, used in the manufacturing of your drug products. Additionally, you relied on your suppliers' certificates of analyses (COA) without establishing the reliability of each of your component suppliers' analyses at appropriate intervals.

Without adequate testing and confirmation of reliability of supplier test results, you lack scientific evidence that the components conform to appropriate specifications prior to use in the drugs products you manufacture.

Your firm failed to test incoming components used in manufacturing your finished OTC drug products to determine identity, purity, strength, and quality. Additionally, your firm did not establish a vendor qualification program for your raw material suppliers.

Your firm used results from your suppliers' certificates of analysis (COAs) without establishing the reliability of your suppliers' analyses through appropriate validation and without conducting at least one specific identity test on each incoming lot of components. You cannot rely on your suppliers' COAs to verify the identity of your components.

In addition, your firm uses **(b)(4)** as a component in the manufacture of your OTC topical pain relief drug product. During the inspection, you stated that you do not test your **(b)(4)** system for objectionable microorganisms, total organic carbon, conductivity, or pH. Your firm has not demonstrated that the **(b)(4)** is suitable for its intended use for pharmaceutical manufacturing and meets the **(b)(4)** USP monograph for chemical and microbiological attributes.

The lack of data regarding the state of control of your **(b)(4)** system poses a potential risk for objectionable microbiological contamination into your drug products. **(b)(4)** must be suitable for its intended use and routinely tested to ensure ongoing conformance with appropriate chemical and microbiological attributes. All components, including **(b)(4)**, must be tested prior to use as required by 21 CFR 211.84(a).

**(b)(4)**

Your firm's OTC topical pain relief drug product uses **(b)(4)**

Without adequate testing and confirmation of reliability of supplier and external laboratory testing results, you lack scientific evidence that your components or drug products conform to appropriate specifications.

Your response to our request for records under section 704(a)(4) indicated that you do not test the identity of each incoming component used in the manufacture of your drug products, such as **(b)(4)**, before manufacturing.

In addition, you failed to test each shipment of **(b)(4)** for **(b)(4)** contamination before use. Identity testing for **(b)(4)** and certain other high-risk drug components includes a limit test in the United States Pharmacopeia (USP) to ensure that the component meets the relevant safety limits for levels of **(b)(4)**. Because you did not perform adequate identity testing on each shipment of each lot using the USP identification test that detects these hazardous impurities, you failed to ensure the acceptability of these components for use in the manufacturing of your drug product. See FDA's guidance document **(b)(4)** for help in meeting the CGMP requirements when manufacturing drugs containing ingredients at high risk for **(b)(4)** contamination.

**Your firm failed to test samples of each component for identity and conformity with all appropriate written specifications for purity, strength, and quality. Your firm also failed to validate and establish the reliability of your component supplier's test analyses at appropriate intervals. Your firm also failed to conduct microbiological testing before use of each lot of a component with potential for objectionable microbiological contamination in light of its intended use (21 CFR 211.84(d)(1) and 211.84(d)(2)) and (21 CFR 211.84(d)(6)).**

*Active Ingredients and Components at Risk for* **(b)(4)** *Contamination*

You failed to perform adequate identity testing of each component lot used in the manufacture of your drug products including your active pharmaceutical ingredients, such as **(b)(4)**. Additionally, your firm failed to perform adequate identity testing of each shipment of each lot of incoming components at high risk of **(b)(4)** contamination. For example, your firm's in-house raw material report for **(b)(4)** lot **(b)(4)**, used to manufacture **(b)(4)** batch number **(b)(4)**, lacked data for identity, **(b)(4)** limits. Furthermore, you relied on your suppliers' COAs without establishing the reliability of each of your component supplier's test analysis at appropriate intervals.

Identity testing for **(b)(4)** and certain other high-risk drug components includes a limit test in the United States Pharmacopeia (USP) to ensure that the component meets the relevant safety limits for levels of **(b)(4)**. Because you did not perform identity testing on each shipment of each lot using the USP identification test that detects these hazardous impurities, you failed to ensure the acceptability of this component for use in the manufacture of your drug products.

The use of ingredients contaminated with **(b)(4)** has resulted in various lethal poisoning incidents in humans worldwide. See FDA's guidance document **(b)(4)**

**(b)(4)** *Used as a Component in Drug Products*

Your firm failed to adequately monitor **(b)(4)** and the microbiological quality of **(b)(4)** used as a component in drug product manufacturing. **(b)(4)** must be suitable for its intended use

and routinely tested to ensure ongoing conformance with appropriate chemical and microbiological attributes.

In your response, you state that you will establish raw material specifications, testing of all incoming materials, a supplier qualification procedure, and a microbial control program for your **(b)(4)** system.

Your response is inadequate because it lacks sufficient details on the remediation of your incoming materials testing program. It also does not include a retrospective review, analysis, and risk assessment for distributed drug products within expiry.