

Baxter Heparin Manufacturing Process

Average Time Between FDA Inspections

30+ yrs

China

United States

2.7 yrs

Source: GAO/HEHS-98-21 Foreign Inspection Program

Number of Deaths of Patients Receiving Heparin Reported to FDA, January 1, 2007 through April 13, 2008		
Month the Medical Event(s) Occurred	Number of Reported Deaths*	Reported Deaths with One or More Allergic/Hypotensive Symptom(s)
Jan-07	3	1
Feb-07	1	0
Mar-07	4	2
Apr-07	4	2
May-07	2	1
Jun-07	3	2
Jul-07	4	2
Aug-07	1	1
Sep-07	2	2
Oct-07	7	4
Nov-07	11	10
Dec-07	20	13
Jan-08	31	21
Feb-08	28	18
Mar-08	3	0
Unknown date	7	2
Total	131	81

Preapproval Inspection Priorities

- 1. New molecular entities (NMEs) (includes finished drug product and the active pharmaceutical ingredient)
- 2. Priority NDAs
- 3. First application filed by an applicant
- 4. For-Cause inspection
- 5. For original applications, if the current CGMP status is unacceptable or greater than 2 years
- For Certain pre-approval supplements, such as site change or major construction, if the CGMP status is unacceptable
- 7. Treatment IND inspections
- Information is available to CDER indicating that an inspection of a clinical supplies manufacturer is warranted to protect the health of patients

Source: FDA Compliance Program Guidance Manual

Raw Material Cost

Average Cost of Crude Heparin Material

