



August 15, 2022

Mr. Muhammad Waheed Hafeez
Proprietor
Subhan Instrumed Co.
Chenab Rangers Road
Near Ali General Hospital
Sialkot, Pakistan 51310

FEI: 3023189244

&

Mr. Muhammad Ejaz
Lead Auditor
QA International Pakistan (North)
1st Floor Shahab Center, Opp S.I.E.,
Sialkot, Pakistan 51310

Dear Mr. Hafeez and Mr. Ejaz:

This is to acknowledge receipt of the June 18, 2022 letter from Mr. Muhammad Ejaz (Auditor) certifying the compliance of Subhan Instrumed Co. (Firm) with the United States Food and Drug Administration (FDA) Quality System Regulation of 1997, which includes the current good manufacturing practice (cGMP) requirements. The Quality System Regulation is set forth in Title 21, Code of Federal Regulations (CFR), Part 820.

The quality system audit report provided by the Auditor states that Subhan Instrumed Co. manufactures surgical instruments and that a quality system audit was performed on June 8, 2022. The inspection found deficiencies and the Auditor states that a corrective action plan was implemented on June 18, 2022. The Auditor recommends that the Firm be added to the Green List of Import Alert 76-01, "Exempt from Detention Without Physical Examination of Medical Instruments from Pakistan."

FDA has reviewed the audit report of Subhan Instrumed Co., including the Quality System Manual, Test Data, and the Corrective Action Plan submitted.

Based on our review, Subhan Instrumed Co. will be placed on the Green List of Import Alert 76-01. The Firm may begin exporting devices to the United States that were manufactured after the consultant certified the Firm's compliance with the cGMP's; however, the Firm's shipments are subject to the guidance outlined in the revised Import Alert 76-01.

The FDA may periodically detain and sample devices from the Firm for verification of conformance to the Quality System Regulation. Failure of the sample will result in the Firm being removed from the Green List of Import Alert 76-01 until the Firm is re-inspected and documentation is submitted to the FDA to show compliance with the Quality System Regulation.

The Firm's placement on the Green List of Import Alert 76-01 is limited to medical instrument devices manufactured under the name of Subhan Instrumed Co., Chenab Rangers Road Near Ali General Hospital, Sialkot - 51310 - Pakistan. In the event the Firm's name and/or manufacturing facility address change, FDA requests that notification be immediately forwarded to this office. A change in the name and/or address of the Firm's manufacturing facility without notifying FDA will result in a re-evaluation of the compliance status of the Firm.

The decision based on the Auditor's certification will remain in effect until such time that FDA is able to visit the Firm for an inspection of the manufacturing facility. During this inspection all corrections and procedures will be evaluated and confirmed. Any new cGMP deviations, or any uncorrected deviations that were previously certified to, may result in a re-evaluation of the compliance status of the Firm, including the possibility of removal from the Green List of Import Alert 76-01. You will be advised of the timing of FDA's inspection schedule.

If the Firm has not conducted a Quality System audit in the past two years, we request that a Quality System audit be conducted within 6 months of receiving this letter. A copy of the Firm's most recent audit should be submitted to FDA for review. The Firm has a responsibility to conduct periodic Quality System audits to ensure conformance with the Quality System regulation.

The audit report should address, at a minimum, the applicable elements of the Quality System Regulation including the following information, as appropriate. This should not be considered an all-inclusive list and additional information may be included.

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|-----------------------------------|--------------------------------|
| o Current Audit Summary | o Facilities |
| o Audit Follow-up Recommendations | o Supplier Control |
| o Corrective Action Plan | o Specifications |
| o Device Master Record | o Production Equipment |
| o Device History Record | o Cleaning and Sanitation |
| o Material Analysis | o Personal Hygiene |
| o Material Hardness Tests | o Training |
| o Material Corrosion Tests | o Hazardous Materials Handling |
| o Quality Manual | o Receiving, Storage, Shipping |
| o Calibration | o Traceability and Recall |
| o Internal Audits | o Consumer Complaints/MDRs |
| o External Audits | o Pest Control |

All manufacturers exporting surgical instruments to the United States should use stainless steel meeting the latest version of the Standard Specification for Wrought Stainless Steels for Surgical

Instruments, ASTM standard F-899. Please assure that the Firm's documents and requirements conform to ASTM standard F-899.

Establishments that are involved in the production and distribution of medical devices intended for use in the United States are required to register and list the devices annually with the FDA. This registration and listing process may be completed electronically. For more information and to complete the process please go to:

<http://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/HowtoMarketYourDevice/RegistrationandListing/default.htm>.

Electronic submission documents should be emailed to cdrhocpakistanaudit@fda.hhs.gov.

Cover letters contained in the electronic submission should be addressed to:

Ms. Deniz B. Mackey, Assistant Director
Imports and Registration & Listing Team
U.S. Food and Drug Administration - CDRH
Office of Regulatory Programs
Division of Regulatory Programs 2
White Oak Building 66
10903 New Hampshire Avenue
Silver Spring, Maryland 20993 USA

Please reference your Facility Establishment Number (FEI), 3023189244, in future correspondence and in the registration process.

If you have any questions regarding this correspondence, or need further assistance, please contact Daniel LaShoto at Daniel.lashoto@fda.hhs.gov.

Sincerely yours,

Tanisha L. Date: 2022.08.16
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Deniz B. Mackey
Assistant Director
Imports and Registration & Listing Team
Division of Regulatory Programs 2
Office of Regulatory Programs
Center for Devices and Radiological Health