4th Brazil-Japan Seminar of Regulations on Pharmaceuticals and Medical Devices

Session 4

Quality Certification on Medical Devices and pharmaceuticals

Proposal from Industry

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Susumu Harashima, Ph.D.
GMP Expert Committee, Quality & Technology Committee,
Japan Pharmaceutical Manufacturers Association（JPMA）

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[A] Introduction of the activities of GMP Expert Committee

GMP Expert Committee in JPMA is supporting many kinds of activities of Japan Authority through FJMAJ (The Federation of Japan Manufacturer Association, Japan), and/or by JPMA alone.

The GMP Expert Committee is contributing to the member companies through transmission of the results of the above activities for aiming at improving the level of quality issuance of the member companies.

(1) Global guideline activities

- Major Guidance (US-FDA, EMA, WHO, CFDA, TFDA, etc) Translation and Transmission
- ICH Q 11 Q & A, Q 12 and Q 9 promotion
- PIC/S transmission

(2) GDP (Good Distribution Practices) activities

- Support for releasing Japan GDP guidelines
- Commentary describing Japan GDP guideline and concrete operation

[A] Introduction of the activities of GMP Expert Committee

(3) DI (data integrity) activities

- Provide three tools which each company can use in an actual manner

  DI Master plan template

  DI compliance assessment sheet

  Equipment/System risk assessment sheet （For lab use）

- Provide training tools

(4) Asia Collaboration

- Cooperation with PIC/S Asia Training (GMP Seminar)
- Participation in ATIM (Access to the Innovative Medicine) section of APAC (Asia Partnership Conference of Pharmaceutical Association) meeting

[A] Introduction of the activities of GMP Expert Committee

(5) Collaboration with Japan Authorities

- Renewal of GMP ordinance activities
- Preparation of Q&As for Mutual Recognition Agreements Japan-EU （MRA）
- Starting a new trial of PACMP (Post-Approval Change Management Protocol), customized to Japan version

(6) Enlightenment activities on quality

- GMP case study conference
- Information exchange meeting (by JPMA member company’s only, based on raw opinions)

[B] Proposal from Industry:

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[1] Difference of "GMP certification process and its necessary timing to be issued" between Brazil and Japan

[2] Current Timing of re-issuance of GMP certificate by Japan Authority, and its characteristics

[3] Proposal for Case-2: A feasible alternative to the current situation of "Japan GMP certificate submission" to ANVISA for stable delivering of the product to the patients in Brazil.

・The above difference of [1] and "the absence/presence of the description of valid term" in the GMP certificate is one of the issues to preventing the medicine from stable supply (without any shortage of the medicine).

・To improve this situation, a feasible alternative to avoid unnecessary GMP inspection (caused by the above differences) **is proposed** in the next 4 slides **from the point of valid term of GMP certificate and its timing to be issued**.

[Disclaimer]:

The purpose of the next 3 slides (incl. some experiences by JMPA) are just for facilitation of discussion.

If there is any doubt in the description in the slide, confirm it in the regulations of each country.

JPMA is not responsible for the damage caused by misunderstanding.

[1] Difference of "GMP certification process and its necessary timing to be issued" between Brazil and Japan

[1] For the renewal of pharmaceutical products to be marketed in Brazil, the Brazil authority (ANVISA) requires GMP certificate of the product in the manufacturing site to be updated every 2 years. Although ANVISA makes inspection on a risk based criteria, the renewal may be granted without the need for an on-site new inspection.

[2]-(1) While the Japan authority requires renewal of "License for manufacturer of drugs" to be updated every 5 years, where the on-site inspections is a must. In addition, for the products exported to oversees, GMP certificate for the products needs to be granted to show that the site is manufacturing the product in compliance with GMP.

[2]-(2) Usually, on-site inspection for the above 2 purpose is conducted all together in "one set of on-site inspection". The Japan GMP certificate granted by the above has 2 characteristics (different from other countries).

(a) The expiry date of the GMP certificate is not written in the GMP certificate.

(b) 2 years later and also after that, Japan Authority does not issue the GMP certificate

This gap is causing an additional GMP inspection in order to meet the requirement from ANVISA that the GMP certificate need to be issued every 2 years, although Japan Authority does not issue it 2 years later and after that.

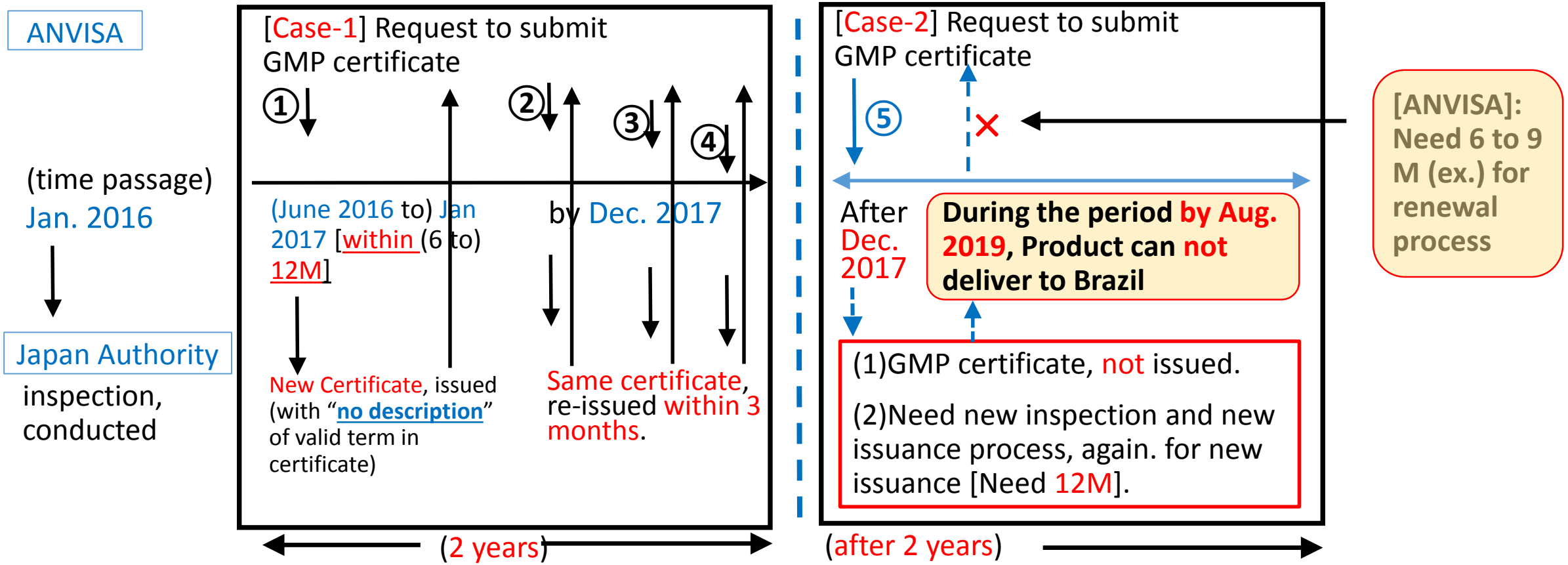
In order to avoid unnecessary additional inspection above, an feasible alternative to the current process is proposed in the next slide.

[2] Current Timing of re-issuance of GMP certificate by Japan Authority, and its characteristics

(1) Japan Authority re-issues GMP certificate within 3 months on company's request, in case the certificate has already been issued based on the latest inspection (=within 2 years).

(2) 2 years later and after that, Japan Authority does not issue the certificate.

Depending on the timing of request from ANVISA, submission of Japan GMP certificate to ANVISA comes to be "2 cases" (below).



(a) MAH: marketing authorization holder, (b) ANVISA does not recognize the certificates from other Authorities. GMP certificate from the country of origin is necessary to be submitted to ANVISA for its approval process by ANVISA. (c)In Japan case, "no description of valid term" in the certificate

[3] Proposal for Case-2: A feasible alternative to the current situation of "Japan GMP certificate submission" to ANVISA for stable delivering of the product to the patients in Brazil

[1] By the time a new GMP certificate is issued by Japan Authority, the following documents might be the alternatives to a new GMP certificate.

(Documents):

(1)latest issued (current) GMP certificate

(2)document to show that "License for manufacturer of drugs" was granted by Japan Authority (issued ever 5 years based on on-site inspection by Japan Authority), and

(3)document to show that the company is holding "License for manufacturer of drugs" also at present. [with all apostilled for (1), (2) and (3)]

[2] At the time when a new GMP certificate is granted by Japan authority, the new certificate is promptly submitted to ANVISA for proceeding with ANVISA's certification renewal process.

By the proposed alternative above:

the most desirable pharmaceutical products will be fully guaranteed to be stably delivered to the right patients in Brazil in a timely manner (without a shortage the product).

JPMA would like to ask to both of the authorities "to open the window" to continue the discussion on this issue. JPMA will be happy to support the discussion between both authorities.

Thank you so much for your kind attention.