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Japan's GMP System and Practical Aspects of GMP Inspection

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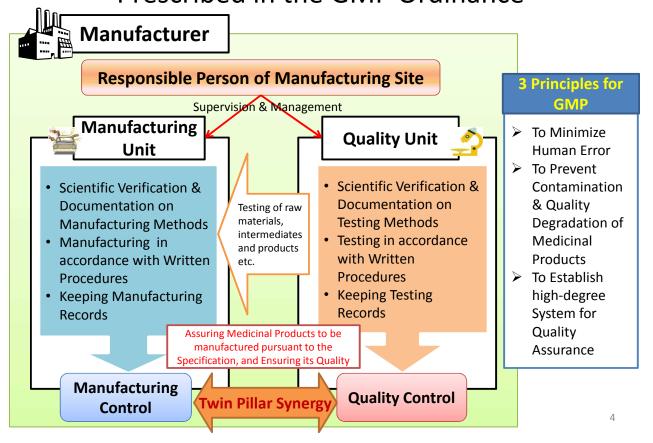
Japan's GMP System

GMP Requirements for Manufacturer

- Manufacturing of Medicinal Products (including APIs) is basically subject to the GMP Ordinance (MHLW Ministerial Ordinance No. 179, 2004).
 - ➤ Applies to manufacturing sites in Japan, but also to foreign manufacturing sites of the products to be exported to Japan
- The current GMP Ordinance has resulted from comprehensive amendment to the former GMP Ordinance (MHLW Ministerial Ordinance No. 16, 1999), having harmonized with ICH Quality Guidelines.

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Concept of Manufacturing Control & Quality Control, Prescribed in the GMP Ordinance



Manufacturer's Responsibility

- Besides routine Manufacturing Control & Quality Control, periodic duties for ensuring product quality should be undertaken under the manufacturer's system for managing quality*.
 - Product Quality Review;
 Article 5 of the GMP Ordinance, ref. ICH Q7 2.5
 - Periodic Review of Validated Systems;
 Article 13 of the GMP Ordinance, ref. ICH Q7 12.6
 - ➤ Internal Audits (Self Inspection);
 Article 18 of the GMP Ordinance, ref. ICH Q7 2.4
 - > Training; Article 20 of the GMP Ordinance, ref. ICH Q7 3.1
- * ICH Q7 2.11

"Each manufacturer should establish, document, and implement an effective system for managing quality that involves the active participation of management and appropriate manufacturing personnel."

Quality Assurance by Marketing Authorization Holder

- ◆ Under Japan's legislation, implementation of Manufacturing Control & Quality Control at the manufacturing site (including for APIs) is one of the Requirements for Marketing Authorization (MA) of each finished product, in principle.
 - ➤ Implementation of Manufacturing Control & Quality Control at the manufacturing site, is undertaken by the manufacturer itself, but also assured under the supervision by the MA holder who entrusts its product manufacturing.

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Marketing Authorization Holder's Responsibility

 The Ordinance on Standards for Quality Assurance (the GQP Ordinance, Ministerial Ordinance No. 136, 2004) is enacted as one of the requirements for Licensing of MA Holder.

Key Points of the GQP Ordinance

- Article 5: Quality Standard Code
- Article 7: Contract with Manufacturers (including Foreign Manufacturers)
- > Article 9: Control of Market Release
- Article 10: Ensuring Proper Manufacturing Control & Quality Control at the Manufacturing Site (including Foreign Manufacturing Site)
- ➤ Article 11: Handling Information on Quality, etc. and Quality Defects, etc.
- ➤ Article 12: Handling Product Recall
- > Article 13: Self Inspection
- > Article 14: Training

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Marketing Authorization Holder's Responsibility

- ◆ Article 7 of the GQP Ordinance; Key items to conclude a contract with manufacturers (including foreign manufacturers)
 - ➤ The nature and extent of the periodical verification, by the MA holder, of the manufacturing duties that they are conducted under the proper and efficient Manufacturing Control & Quality Control,
 - The procedures and the responsible persons to communicate, in advance, any change in the manufacturing procedure, testing procedure, etc. to the MA holder, in case where such a change could affect the quality of the products,

Marketing Authorization Holder's Responsibility

- Article 10 of the GQP Ordinance;
 Ensuring Proper Manufacturing Control & Quality
 Control at the Manufacturing Site (including foreign manufacturing site)
 - ➤ Obtaining relevant information from the Manufacturer (including Foreign Manufacturer),
 - ➤ Periodical verification (on-site, if necessary)
 that the Manufacturing Control & Quality Control
 is conducted properly by the Manufacturer
 (including Foreign Manufacturer)

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GMP Inspection by Competent Authority

- **♦** Japan's Competent Authorities
 - Office of Manufacturing/Quality and Compliance,
 Pharmaceuticals and Medical Devices Agency
 (PMDA)
 - 47 Prefectural Inspectorates

Demarcation between Japan's Inspectorates

- PMDA conducts GMP Inspections
 - > On Foreign Manufacturing Sites, or
 - Regarding the drugs (including APIs) requiring special attention in terms of Manufacturing Control & Quality Control, such as
 - ✓ New Drugs
 - ✓ Biological Products
 - ✓ Products utilizing Genetical Recombination Technology
 - ✓ Products utilizing Cell Culture Technology
 - ✓ Radio Pharmaceuticals, etc.
- Prefectural Inspectorates conduct GMP Inspections on Local Manufacturing Sites in Japan, regarding the products other than above, as of generic drugs, OTC drugs, etc.

Types of GMP Inspection

♦ GMP Audit

for which the MA Holder or the manufacture submitted an application regarding their products

GMP Surveillance

Competent Authority, even though not requested by the MA Holder/the Manufacturer, to the manufacturing site, pursuant to the provision in Article 69 or Article 75-4 paragraph 2 of the PMD Act.

Types of GMP Inspection

GMP Audit

- Pre-Marketing GMP Audit for MA (including partial change of existing MA)
- Periodical GMP Audit after MA as a Requirement for Maintaining the MA, at least Once every Five years after MA of the product
- ➤ GMP Audit on manufacture of the products to be exported from Japan where a GMP certificate being requested by foreign government and/or International Organization, regarding the domestic manufacturing site

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Types of GMP Inspection

- ◆ GMP Audit categorized by method
 - On-site Audit

to be conducted at least Once every Two years approximately in principle, to each manufacturing site

Dossier Audit (Desk-top Audit)

may be substituted for the on-site audit, taking into account of

- ✓ The type of the product to be audited
- ✓ The manufacturing process of the product to be audited
- ✓ The changing history of the manufacturing facilities
- ✓ The results of previous GMP inspections to the site
- ✓ Previous product recall caused by the site, etc.

Types of GMP Inspection

GMP Surveillance

- Usual Surveillance may be conducted without notice, taking into account of the previous GMP deficiencies and/or the degree of requiring Manufacturing Control & Quality Control
- Special Surveillance to be conducted without notice, in principle, regarding pernicious non-compliances e.g. fraud etc. (including suspected cases)

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Enhancing GMP Surveillance

<Background>

- Recent case of serious violation to the GMP Ordinance
 - -In case of the Chemo-Sero-Therapeutic Research Institute (KAKETSU-KEN), regulatory authorities had been unable to find out the MAH's fraudulence of different manufacturing methods with marketing approval documents, in spite of repeated on-site inspections.

Enhancing GMP surveillance

- ◆ On 15 Jan. 2016, MHLW issued a notification for PMDA & each prefectural inspectorate, to enhance GMP surveillance without notice, as well as announced of their enhancing GMP surveillance to pharmaceutical industries.
 - ➤ PMDA should basically conduct GMP surveillance without notice, concerning blood plasma products and vaccines.
 - ➤ Concerning other products, PMDA and prefectural inspectorates should conduct GMP surveillance without notice, if necessary, based on the products' risks and the manufacturer's antecedents, etc.

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Types of GMP Inspection

◆ Competent Authorities may conduct a surveillance without notice, concerning the matters which the Manufacturer does not anticipate, in the course of the notified GMP Audit which have been requested by the MA Holder/the Manufacturer.

International Cooperation on GMP Inspection

PIC/S

Pharmaceutical Inspection Convention and Pharmaceutical Inspection Co-operation Scheme



- An International Framework for Cooperation among Competent Authorities responsible for Pharmaceutical Inspection
 - 48 participating authorities from European countries and others (as of Jan. 2016)

Activities;

- i. International Harmonization on Pharmaceutical GMP
- ii. International Cooperation on Pharmaceutical Inspection, such as information sharing and training, etc.

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International Cooperation on GMP Inspection

♦ PIC/S

Pharmaceutical Inspection Convention and Pharmaceutical Inspection Co-operation Scheme

- ➢ Procedure to inform Foreign Regulatory Agencies of Foreign Inspections to be conducted in their Jurisdiction
 - came into effect since Nov. 2015
 - ✓ the date of the last inspection
 - ✓ the possibility to share available inspection reports (in the language in which the inspection report was written)
 - ✓ where appropriate, request for opportunities to participate as an observer in the inspection or explore options for that of a joint inspection

Japan's Participation in PIC/S

- Mar. 2012;
 MHLW submitted the application form to the PIC/S office.
- May 2012;
 Japan's application was accepted at the PIC/S Committee.
- Sep. 2013;
 Local assessment was conducted in Japan.
 - As preparatory efforts for participation in PIC/S, Japan upgraded its GMP System in each inspectorate, including training of inspectors of PMDA and 47 prefectural inspectorates, revision of GMP inspection manual etc.
- May 2014; Japan's application for participation in PIC/S was approved at the PIC/S Committee.
- Jul. 2014; Japan's Competent Authority (MHLW, PMDA and 47 prefectural inspectorates) officially became the 45th PIC/S participating authority.

Participation in PIC/S proves that the participating authority possess GMP Inspection system on a certain international level, however, does not ensure the equivalence of GMP requirements and their implementation among participating authorities.

Bilateral Cooperation on GMP Inspection

- ◆ Exchange of Letters for the establishment of a mechanism for facilitating the mutual exchange of GMP inspection information, between competent authorities of Australia and Japan, in Apr. 1993
 - Recognizing the equivalence of GMP inspection system between Australia and Japan, PMDA ascertains GMP conformity of the products manufactured in Australia, in principle, through the GMP certificate issued by the Australian competent authority, TGA.

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Bilateral Cooperation on GMP Inspection

- Mutual Recognition Agreement (MRA) between Japan and the European Community, including GMP for medicinal products, since May 2004
 - The Scope of MRA are currently limited to chemical pharmaceuticals (excluding APIs and sterile products). >> to be expanded...
 - European competent authorities which are confirmed the equivalence of GMP requirements and their implementation were expanded from previous 15 countries to 28 countries (All EU members), in Apr. 2016.

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Practical Aspects of GMP Inspection

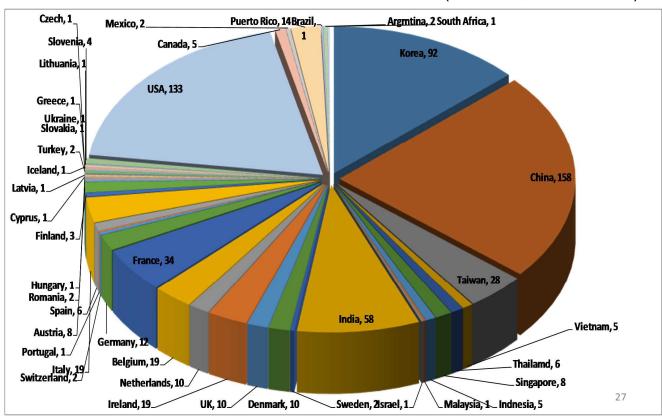
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Number of the manufacturing sites subject to PMDA's inspection (as of April 2014)

	Foreign sites	approx. 3100	
•	Manufacturing sites accredited by N	лнLW 2872	<u>)</u>
	– Asia, Middle East	1220	
	– Europe	1091	
	 North America and others 	561	
•	Other manufacturing sites (of API precurs	ors, etc.)	
	specified in the marketing approval documents	approx. 200	
	Domestic sites	approx. 440	
•	Manufacturing sites licensed by MF	ILW 81	
	 Biological products, etc. 	62	
	 Radio-pharmaceutical products 	19	
•	Manufacturing sites involved in new d	rugs approx. 350 ₂₆	6

Overseas on-site GMP Audits by PMDA

2005.4 - 2015.12 (684sites, 43 countries)



PMDA's On-Site GMP Audits to Manufacturing Sites in Korea

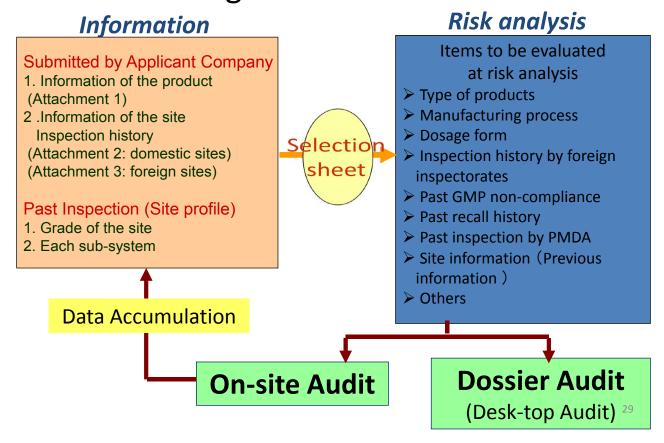
	2011	2012	2013	2014	2015
Total Number of Overseas On-Site GMP Audit	61	65	66	71	65
Number of On-Site GMP Audit in Korea (Number of Site Evaluation:	17 (7/0)	13 (3/2)	11 (4/0)	13 (3/0)	10 (5/0)
Percentage to Total Number (%)	28	20	17	18	15

^{*} Manufacturing Sites were graded as S, A, B, C or D in accordance with the outcome of PMDA's On-Site GMP Audit

D: Manufacturers in non-compliance with GMP Ordinance

C: Manufacturers in compliance with GMP Ordinance, but needed to be given continuous instructions

Risk-based approach in selecting On-site or Dossier Audit



Examples of PMDA's findings at manufacturing sites in Korea

Prevent Cross-Contamination

- Method on cleaning were not verified in advance.
- Validation of cleaning were not applied.
- No evaluation on the appropriateness of cleaning method at single-purpose facility.
- No evaluation on the cross-contamination risk with multiple products at a common facility.
- No evaluation on the appropriateness of an onsite visual confirmation after cleaning.

Containment

- Single changing room was used.
- Powder drifting workroom was positively pressurized.
- Treatment of drug substance adhered to production record was not appropriate.
- There was no specific procedure for air filters replacement.
- Monitoring had never been performed to confirm the level of containment at the manufacturing building.

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Examples of PMDA's findings at manufacturing sites in Korea

Aseptic Assurance

- Final containers are handled in non-aseptic area after sterilization.
- Materials using aseptic area are charged through the non-aseptic area.
- Operators are not trained and don't have enough knowledge about aseptic operations.
- Laminar flow is not ensured in the aseptic area.

Examples of PMDA's findings at manufacturing sites in Korea

Compare and Review Product Quality

- Failure, revision, and complaints were not considered.
- Although the percentage of impurities of a product is not normal, no specific actions were taken.

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Manufacturers' frequent misunderstanding

Complied with the specified test of products



What is GMP?

Positive

Standard of methods for Manufacturing Control & Quality Control, which are strictly required to comply by the PMD Act.
Passive Activities

No!

Measures to guarantee the quality of manufactured products, as a responsibility of the manufacturer

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Business Counterparts for GMP System

- Manufacturing Control & Quality Control
 - Manufacturer(s) in Japan/Korea
- Quality Assurance
 - Pharmaceutical Company in Japan, as MA Holder
- GMP Inspection (Audit & Surveillance)
 - > MHLW/PMDA/Prefectural Inspectorate (Japan)
 - > MFDS (Korea)

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Thank You for Listening

GMP system and International Cooperation of Korea

- Joint Symposium on Medical Products -

23 June 2016, Tokyo

Director Myengho KIM Pharmaceutical Quality Division



韓国のGMP規定と国際協力の推進

- 韓日共同シンポジウム -

2016. 6. 23.

医薬品品質課長 キム・ミョンホ





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- 1 韓国食品医薬品安全処の医薬品GMP運営
- ² GMP規定現況
- 3 GMP分野における韓国の国際協力現況

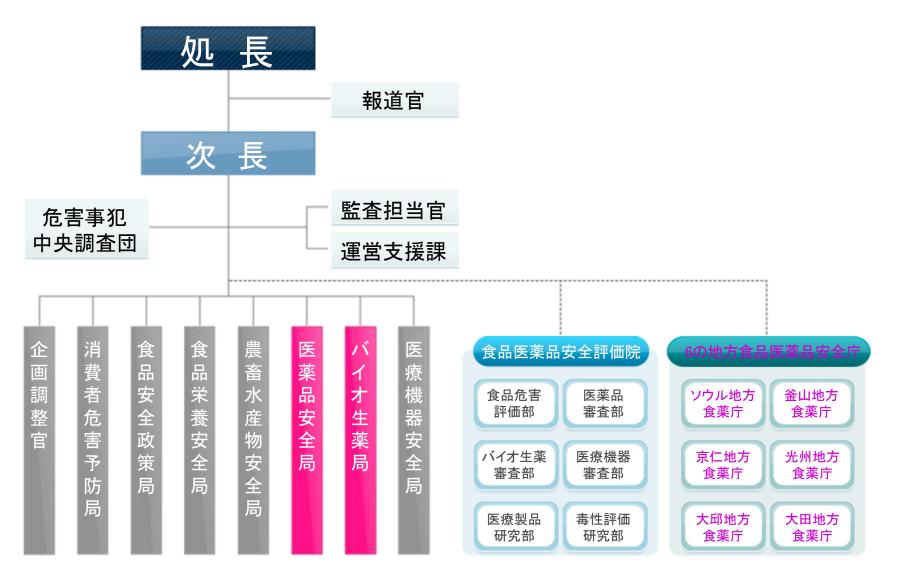




韓国食品医薬品安全処の医薬品GMP運営



食品医薬品安全処(MFDS)の組織図





食品医薬品安全処の分野別業務

医薬品安全管理に関する政策開発および総合計画の策定

医薬品に関する法令および 告示の制・改定

医薬品の適正使用情報の提供

医薬品の市販後の安全管理

医薬品の製造およびGMP関連 計画策定

> 医薬品の製造・輸入品目の GMP評価

医薬品の回収・廃棄管理

医薬品の収去・検査総括

医薬品 安全管理 医薬品 許可審査 医薬品の製造・輸入品目の許可

医薬品の許可・申請管理システムの運営

大韓民国薬典(薬局方)など医薬品の基 準・規格の設定および運営

医薬品の品質および安全性・有効性審査

臨床試験計画書の審査

生物学的同等性試験評価

バイオ医薬品の国家出荷承認

医薬品 品質管理 麻薬類 安全管理 ■麻薬類関連法令および制度の検討

麻薬類管理基本計画の 策定・調整および諸般の統計管理

麻薬類の製造・輸出入業および品目許可



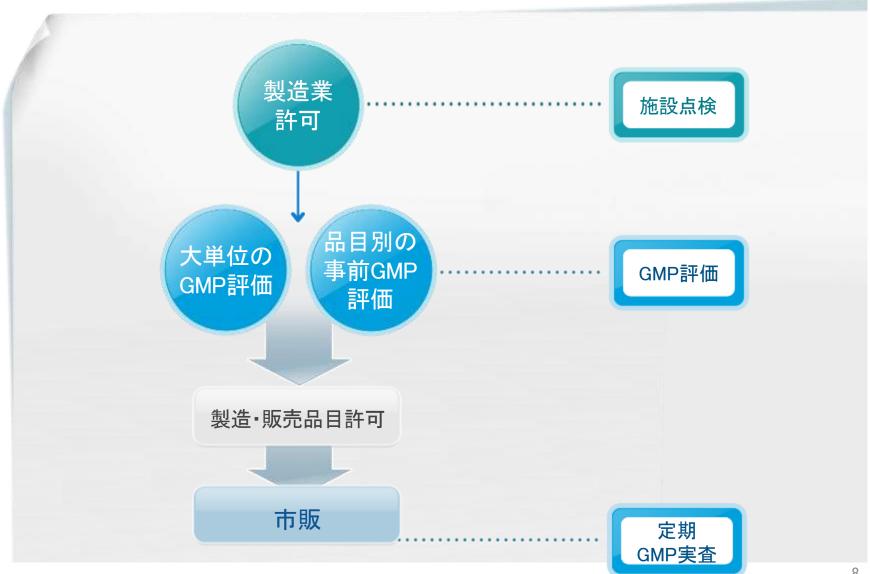


GMP分野の業務





医薬品製造業の許可とGMP評価





医薬品のGMP管理

◎ 事前GMP実査

- ■書類評価を基本に、剤形や製造方法などの特性を考慮して現場評価を実施
 - ※ 根拠: 医薬品等品目別の事前GMP評価運営指針(2012.05.)

◎ 事後GMP実査(定期実査)

- ■危害要素基盤点検体制の構築
- 医薬品 GMP実査履歴、製造・品質関連規定違反、GMP評価結果、 特殊製剤製造の有無などを考慮して対象企業を選定
- バイオ医薬品 危害要素の確認および遮断を中心とした点検プロセスの確立

区分	周期	方法
医薬品	3年	現場実態調査
バイオ医薬品	3年	現場実態調査



^{**} 海外の製造所については年間計画に沿って別途実施



GMP調査官の管理

◎ PIC/S登録のGMP調査官現況(`15 基準)



② GMP調査官の業務範囲

- 医薬品製造会社に対する定期 随時監視
- 品目別の事前GMP評価
- その他の薬事監視員の業務

O GMP調査官の条件

- •薬事監視員のうち以下の条件を満たす者
 - 1 薬剤師または漢方薬剤師/この基準に関する豊富な知識と経験を有する者
 - ② GMP調査官教育を履修した者
 - ※ 医薬品等安全に関する規則[別表1] 15.3 調査官



GMP調査官の能力管理

O GMP調査官の教育現況



GMP : CSI

- 随時開催
- GMP専門家の講演
- Case Study

能力強化ワーク

- 年2回
- 外部講師による講演、 最新のGMP現況の 共有

能力評価ワーク

- 年2回
- GMP調査官を対象に した評価および教育

サイバー教育

食品医薬品安全処 のサイバー教育センター



初級

- * GMP規定
- ・バリデーション
- 模擬実査(基本)

中級

- バリデーション実務
- 模擬実査(中級)



PIC/S主管セミナー

 Workshops, Seminars, Expert circle meetings WHO, ICH, US FDA-PDA, EMA-PDA開催セミナーなど



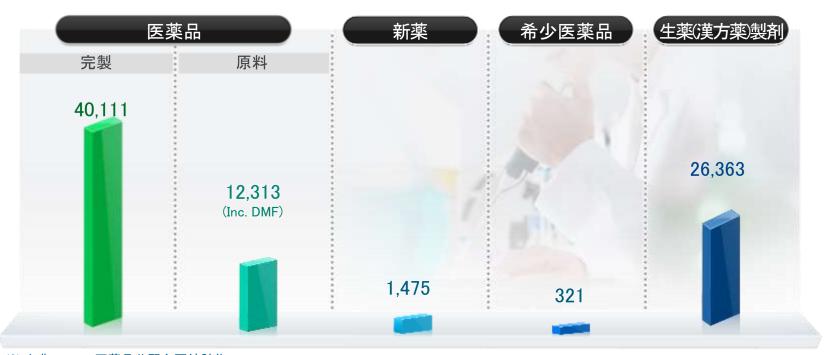
医薬品製薬産業現況(`15年基準)



※ 出典: 2015, 医薬品分野主要統計集



医薬品許可現況(`15年基準)



※ 出典: 2015, 医薬品分野主要統計集





GMP規定現況



GMP制度の沿革



▶優秀医薬品製造管理基準の制定(保健社会部例規)



▶ 完製医薬品のGMP義務化 (医薬品の製造および品質管理基準について薬事法施行規則 [別表4] 新設)



- ▶ 原料医薬品のGMP義務化('02.7)
- ▶ 生物学的製剤のGMP新設('00)-義務化('01)、品目別事前GMP導入('02)-義務化('03)



- ► 品目別事前GMPおよびバリデーションの義務化 [新薬('08.1)、専門('08.7)、 一般('09.7)、原料および医薬外品(内用固形剤、内用液剤)('10.1)]
- ▶ 変更管理、逸脱管理、年間品質評価の導入などGMP規定の先進化(*08)



- ▶ 原料医薬品、放射性医薬品、医療用高圧ガス、臨床試験用医薬品のGMP新設 (医薬品等の安全に関する規則、'14.8.21 改正 '15.7.1 施行)
- ▶ GMP適合判定制の導入(医薬品等の安全に関する規則改正、'14.10.10)



▶ 医薬品の製造および品質管理の詳細規定を新設 (医薬品の製造および品質管理に関する規定制定、'15.7.1 施行)



GMP関連法令体系





GMP関連法令体系

○ 医薬品等の安全に関する規則(総理令)

別表 1

Annex 3-2

管理基準

医薬品の製造および品質管理基準

放射性医薬品の製造および品質

原料医薬品の製造および品質管理 漢方薬の製造および品質管理基準

基準

Annex 3-3

Annex 1-2

医療用高圧ガスの製造および品質 管理基準

生物学的製剤などの製造および品質 管理基準

Annex 3

Annex 4-2

Annex 2

臨床試験用医薬品の製造および品質 管理基準

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PIC/SレベルのGMP規定改正(総理令)

完製医薬品

「医薬品等の安全に関する規則」 [別表1] 改正

原料医薬品

「医薬品等の安全に関する規則」 [別表1の2] 新設

放射性医薬品

「医薬品等の安全に関する規則」 [別表3の2] 新設

医療用高圧ガス

「医薬品等の安全に関する規則」 [別表3の3] 新設

臨床試験用医薬品

「医薬品等の安全に関する規則」 [別表4の2] 新設

希少医薬品

「医薬品等の安全に関する規則」 第4条 改正

標準製造 基準医薬品

「医薬品等の安全に関する規則」 第5条 改正

輸出用医薬品

「医薬品品目許可・申告・審査規定」 第22条 改正 非無菌生薬製剤バリデーション、 市販後安定性試験などを導入

GMP基準施行

GMP基準施行

GMP基準施行

GMP基準施行

許可段階GMP評価

許可段階GMP評価

許可段階GMP評価

総理令 第1089号

改正 ('14.8.21)

施行 ('15.7.1)



PIC/S GMP規定16付属書の告示化(`15.7)

PIC/S GMP規定付属書

人体用生物医薬品の製造 Annex 2 8 放射性医薬品の製造 Annex 3 医療用高圧ガスの製造 Annex 6 生薬医薬品の製造 Annex 7 臨床試験用医薬品の製造 Annex 13 ヒトの血液または血漿由来医薬品の製造 Annex 14 適格性評価とバリデーション Annex 15 原料医薬品GMP (Part IIと同じ) Annex 18

総理令に 主要骨子を 中心に反映

Annex I無菌医薬品の製造Annex 8出発物質および包装資材の検体採取Annex 9液剤、クリーム剤、軟膏剤の製造Annex 10吸入用圧縮定量エアロゾル製剤の製造Annex 11コンピューター化システムAnnex 12電離放射線の医薬品製造での使用Annex 17変数に基づく出荷承認

参照検体および保管検体

Annex 19

ガイドラインを 告示化

 Annex 4
 免疫医薬品を除く動物用医薬品の製造

 Annex 5
 動物用免疫医薬品の製造

 Annex 16
 有資格者(QP)と製造単位出荷承認

 Annex 20
 品質リスク管理(=ICHQ9)

食薬処の所管で はない。または PIC/S側の義務事 項ではない。 医薬品の製造および品質管理に関する規定(15.6.17制定 15.7.1施行)

Annex 1	別表 1 無菌医薬品の製造
Annex 2	別表 2 生物由来医薬品の原料および完製医薬品の製造
Annex 3	別表 3 放射性医薬品の製造
Annex 6	別表 4 医療用高圧ガスの製造
Annex 7	別表 5 漢方薬(生薬)製剤の製造
Annex 8	別表 6 出発物質および包装資材の検体採取
Annex 9	別表 7 液剤、クリーム剤、軟膏剤の製造
Annex 10	別表8吸入用圧縮定量エアロゾル製剤の製造
Annex 11	別表 9 コンピューター化システム
Annex 12	別表 10 電離放射線の医薬品製造での使用
Annex 13	別表 11 臨床試験用医薬品の製造
Annex 14	別表 12 ヒトの血液または血漿由来医薬品の製造
Annex 15	別表 13 適格性評価とバリデーション
Annex 17	別表 14 媒介変数に基づく出荷
Annex 18	別表 15 原料医薬品の製造
Annex 19	別表 16 参照検体および保管検体





GMP分野における韓国の国際協力現況





ICMRA*「GMP実査ワーキンググループ」の活動

- *医薬品規制当局の国際連合(ICMRA)
- : International Coalition of Medicines Regulatory Authorities
 - ▶ 2013年第8回世界医薬品規制当局長会合の結果、ICMRAを設立
 - ▶ 15カ国の規制当局およびオブザーバー規制当局とWHOで構成
- ◆ ICMRA内の7つのワーキンググループのうち「GMP実査 ワーキンググループ」に参加

No.	Working Groups	Participating Countries
1	Governance covering the operational system and rules	6 countries including Ireland (presidency)
2	Analyzing and mapping the existing global cooperative initiatives	5 countries including EU (presidency) √ 韓国参加
3	Communication with the existing global agencies and partners	5 countries including Brazil (presidency)
4	Information sharing within the association	6 countries including Ireland (presidency)
5	GMP inspection	9 countries including the UK (presidency) √ 韓国参加
6	Reviewing generic medicines	6 countries including Australia (presidency) √ 韓国参加
7	Capacity building of regulatory agencies	5 countries including Japan (presidency)

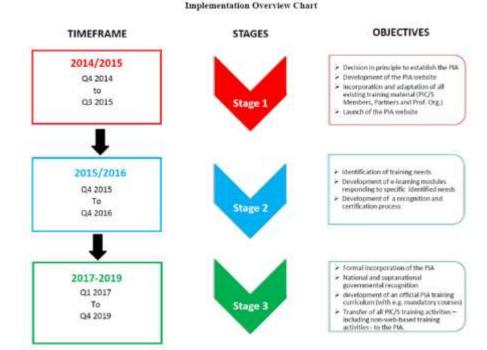




●「PIC/S調査官アカデミー(PIA)」構築活動

- * PIA運営委員国
 - : シンガポール(議長国)、スイス、米国、英国、南アフリカ共和国、ウクライナ、台湾、豪州、韓国
- ▶ (PIAとは)「インターネット基盤の低コスト・高効率、グローバルな高品質」のGMP調査官 教育訓練プログラム の構築を目指すPIC/Sの新規重点事業
- ▶ PIC/S調査官教育訓練をプロジェクトとして3段階のロードマップで進める。

●「PIC/S調査官アカデミー運営 委員国(PMSC)」として参加中







• 韓・ASEAN医薬品GMPカンファレンス

- * 第1回韓・ASEAN医薬品GMPカンファレンス(`15.4月、ソウル)
- * 第2回韓・ASEAN医薬品GMPカンファレンス(`16.10月予定、ソウル)
- ◆ ASEANの10の加盟国および事務局の規制当局者約20人を招待 規制当局者間のネットワークおよび相互協力の強化
 - ▶3日間の日程、公式の両者間会合、カンファレンス、セミナー、製造所現場訪問









● WHO協力センター(Collaborating Center)

- ・食品医薬品安全評価院がバイオ医薬品標準化分野のWHO協力センターに指定される。(2011.01)
 - ** 米国(FDA/CBER)、英国(NIBSC)、日本(NIID)、豪州(TGA)に続いて5番目



- ② WHO Guideline 開発会議に出席
- ③ 西太平洋(WPRO)地域ワクチン規制当局機能強化会議

ありがとうございました。



医薬品品質課



Activities of Quality & Technology Committee in JPMA

Japan Pharmaceutical Manufacturers Association (JPMA)

Quality & Technology Committee Tamiki Nishimura, Ph.D.

About JPMA



- ➢ Japan Pharmaceutical Manufacturers Association (JPMA) is a voluntary association comprising 73 research-oriented pharmaceutical companies (as of May, 2016).
- Established in 1968 to pursue healthy growth of pharmaceutical industry by solving various issues, together with obtaining social understanding.
- ➤ Wide variety of activities encompassing advisory suggestion of political making, globalization and public relations activities.
- ➤ One of the key players of ICH activities, working together with PhRMA and EFPIA.
- ➤ One of the members of IFPMA, close dialogue with other members to contribute global healthcare in the areas of endemics, intellectual properties and anti-counterfeits.

Board of Directors



President

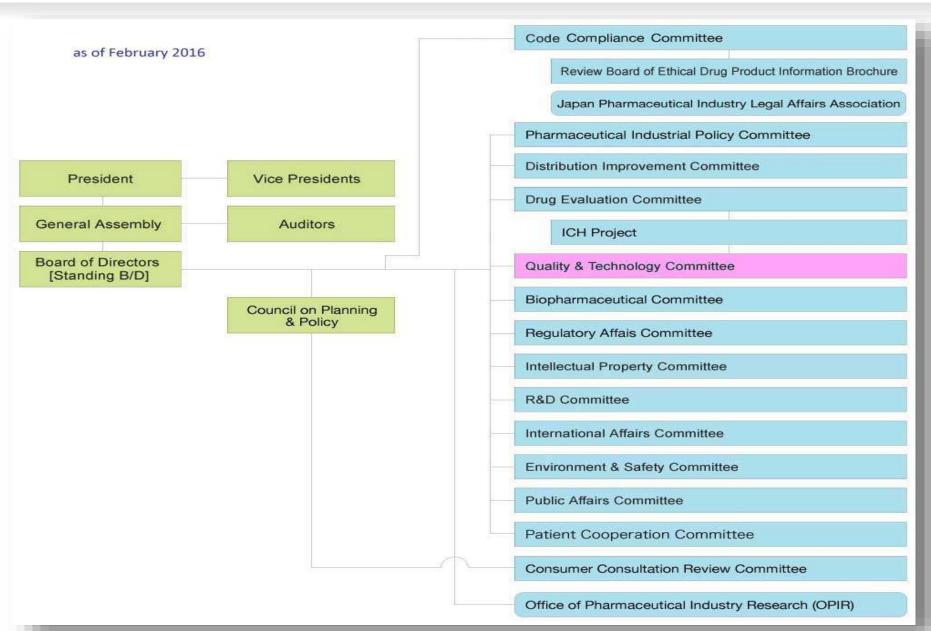
Yoshihiko Hatanaka, President and CEO Astellas Pharma Inc.

Vice Presidents

- Joji Nakayama, President & Chief Executive Officer Daiichi Sankyo Co., Ltd.
- Haruo Naito, Director, President and CEO Eisai Co., Ltd.
- Isao Teshirogi, Ph.D., President and Representative Director Shionogi & Co., Ltd.
- Masayo Tada, Representative Director, President and CEO,
 Sumitomo Dainippon Pharma Co., Ltd.
- Christophe Weber, President and CEO
 Takeda Pharmaceutical Company Limited
- Michihiro Tsuchiya, Chairman of the Board & Representative Director Mitsubishi Tanabe Pharma Co., Ltd.

Structure of JPMA





Quality & Technology Committee

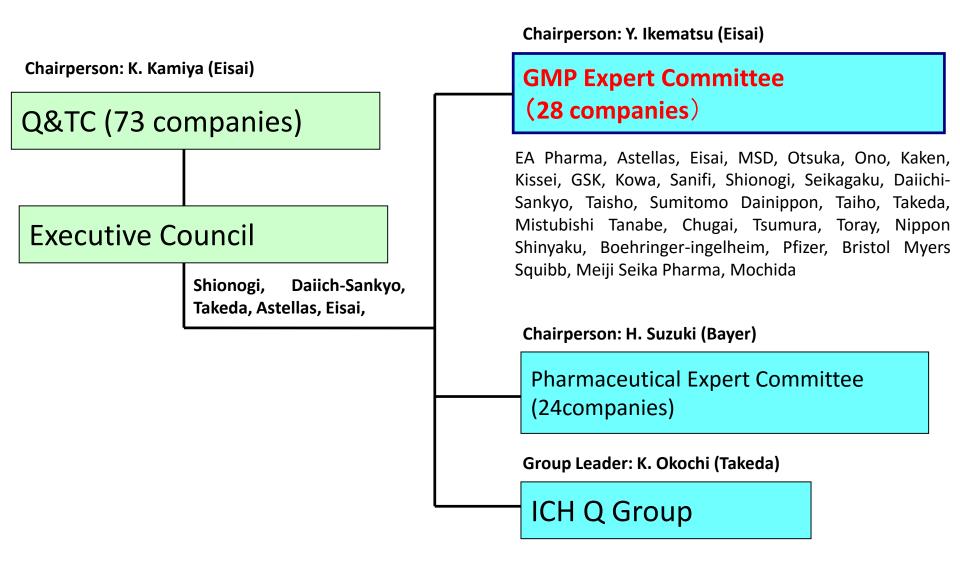


<Key Activities>

- > Established in 1973.
- Implement surveys and studies on good manufacturing practice(GMP).
- Implement pharmaceutical manufacturing technology with subjects related to their physical properties.
- Establish and promote measures to improve reliability and quality of pharmaceutical products.
- ➤ Develop guideline(s) on quality topic(s) within the framework of trilateral harmonization(i.e., Japan, US, and EU) in collaboration with ICH-Quality Group.

Quality & Technology Committee





GMP Expert Committee Members



as of October 2015



GMP Expert Committee Policy (2016) JPMA



<Our policy>

- ☐ To proactive approach to key stakeholders including committee members and relevant societies.
- ☐ To deliver useful information, and suggest effective solutions.

Key Focus 2016



- 1. Overseas guidance watcher
 - Monitors global GM(D)P regulatory trend/information including PIC/S/FDA/EU/WHO, and makes the information widely available among member companies through GMP news/e-mail.
- 2. Survey of GM(D)P regulation(s) in Asian countries, e.g., SFDA, TFDA, MFDS etc.
- 3. Support for PMDA by offering manufacturing plant to perform on-site GMP training, i.e., PIC/S GMP training.
- 4. Support for ICH Q7-IWG, Q11-IWG and Q12-EWG, working together with ICH-Quality Group.

PIC/S GMP Training



- PMDA established the "Asian Training Center for Pharmaceuticals and Medical Devices Regulator Affairs".
- Plan, design and coordinate training for PIC/S-related Asian regulatory authority staffs.
- Provide training opportunities including on-site training.
- JPMA provides support to PMDA by offering manufacturing plant to perform "on-site GMP training".



Other Activities 2016



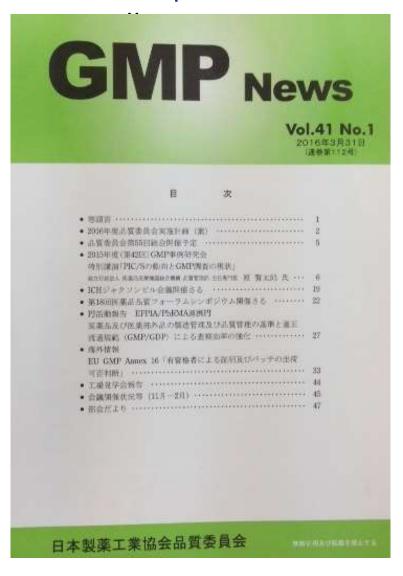
Review and propose technical and execution issues of global fundamental GMP.

- (1) GMP News Publication (3 times/year, 113th 115th edition)
- (2) GMP Case Study Seminar
- (3) GMP Discussion Forum
- (4) Involvement of Quality Forum
- (5) GDP (including counterfeit) information collection and review
- (6) GM(D)P Glossary update
- (7) PIC/S GMP translation support (i.e., Annex 1, 3, 5, 8, 15, 16 etc)

GMP News



Triannual publications



GMP Case Study Seminar



<FY 2016 plan>

- Held at Tokyo and Osaka in September.
- FY2016 Agenda
 "PIC/S GM(D)P updates, Data integrity and Case Study"

<FY2015 performance>

> 799 and 677 participated in Tokyo and Osaka, respectively.





http://www.jpma.or.jp/information/quality/

GMP Case Study Seminar 2013-2015





Sep., 2013 Case Study of ICH Update and Work Toward GMP Global Internationalization

- Case Study of Introducing Product Quality System
- Case Study of Introduction of GDP Toward Globalization



Sep.,2014 Case Study of ICH Updates and Work Toward PIC/S GM(D)P

- High lights of EU-GDP Revision and Case Study of GDP Introduction
- Preparation for GMP inspections from PIC/S Member Countries

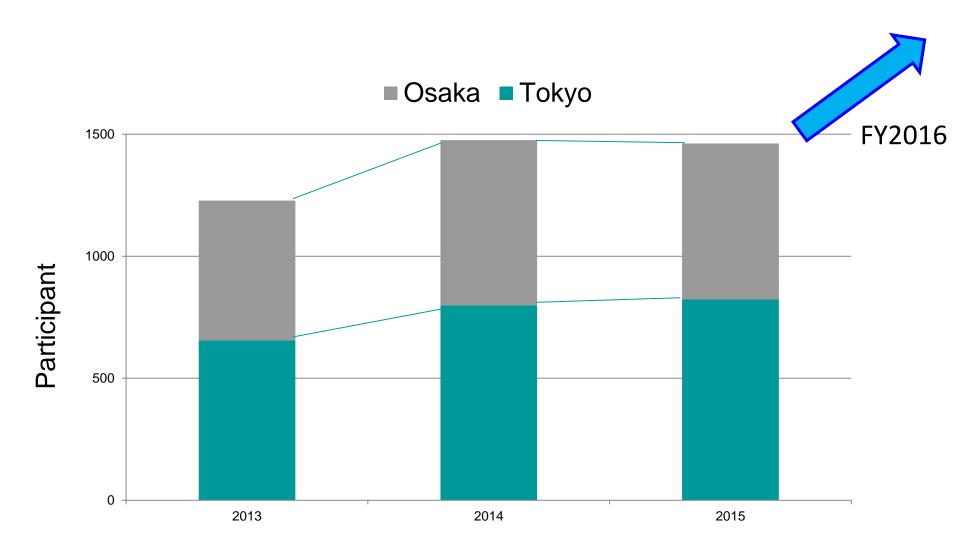


Sep., 2015 PIC/S GM(D)P Updates and Case Study

- Case Study of Quality Risk Management
- Preparation for GMP Inspection from PIC/S Member Countries

GMP Case Study Seminar





Fiscal Year

GMP Discussion Forum



<FY 2016 plan>

- ➤ Held in Osaka on October 4th, 2016.
- > This year's theme is

"those requested in the pharmaceutical companies - GMP compliance and Quality Culture.

<FY2015 performance>

- ➤ The Q&T Committee member companies gathered in October.
- ➤ 2015 theme was "retrace the last decade of GQP/GMP system in Japan the road to the international consistency".
- All of the participants exchanged information on their unsolved and confronting items freely and frankly.

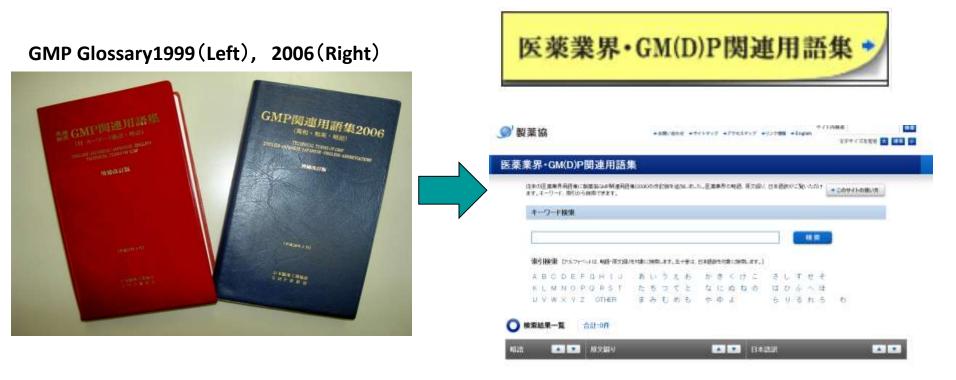




GM(D)P Glossary project



Banner in JPMA Homepage (2016.4.1-)



http://www.jpma.or.jp/

Topics of concern



- Now that both Korea and Japan became the PIC/S members, mutual recognition of GMP-level can be considered, which enables effective use of agency's resources as well as reduction of industry's burden.
 - ☐ Specifically, introduction of simplified inspection program including documentary inspection would be beneficial.

- ➤ Reconsideration of Drug Master File (DMF) which is required for NDA submissions with "open-part level" API information.
 - ☐ Use of DMF system should be applicant's option.

Topics of concern



- Requirement for Clean Hold Time (CHT) and Dirty Hold Time (DHT) setting.
 - ☐ CHT and DHT are determined before sales start, instead of before NDA approval.
 - Data to determine CHT and DHT are collected from at least one batch based on risk assessment, instead of three consecutive batches.
- ➤ Updated information on MFDS's new policy initiatives, such as priority review process and breakthrough therapy designation is awaited.
 - Publication of specific contents together with timetable for implementation will be appreciated.



감사합니다



Backup Slide





Agenda for Team Meeting of 4th Dec 2015 JPMA Efpia-PhRMA-JPMA Inspection Collaboration

- a) Efpia reorganisation and current topics
- b) Outline of an organisation structure and function of JPMA/GMP team
- c) Update of activities of the inspection collaboration team and topics in 2016
- d) Update Q9 IWG
- e) Knowledge Management-Basic understanding and practical implementation

Asia Pacific Conference of Pharmaceutical Association



Hosted by JPMA in April, with 300 delegates of 11 Asian countries healthcare authorities and industry.

Contribution of Counterfeit drug session was held in 4th APAC.





http://www.jpma.or.jp/english/apac/

Quality Forum Symposium



To be held in February.

Organised by National
Institute of Health Sciences
(NIHS) and Co-hosted with
JPMA/ Pharmaceutical Society
of Japan.



Agenda in 2016 "QbD Application and Contenuous Manufacturing in Japan".

250 participants.

http://www.nihs.go.jp/drug/PhForum/



Other activities



- [2]Support Asian countries for GMP issues
 - Leading Asian countries in this field based on APAC.
 - ➤ Oraganized counterfeit drug session in 4th APAC (Apr 2015).
- [3]Action and proposal for regulatory issues, working together with **FPMAJ**.
 - Questionnair of PIC/S GDP and report to FPMAJ GQP GMP task force (27th Oct, Tokyo, 5th Nov, Osaka & 10th Nov, Toyama).
 - Public Comment collection of revised Annex 1.
 - Draft proposal of quality related ordinance and comment collection.

Organization of FPMAJ



The Federation of Pharmaceutical Manufacturers' Association of Japan (FPMAJ)

Chairperson: M. Tada,

Dainippon Sumitomo Pharma

- **JPMA**
- Japan Generic Medicines Association
- Japan Direct-Selling Pharmaceutical
 Manufactures Association
- Japan Self- Medication Industry (OTC)
- Japan Kampo Medicines ManufacturesAssociation
- Others (14 in total)

- Pharmaceutical Manufacturers' Association of Tokyo
- Osaka Pharmaceutical ManufacturersAssociation
- Shiga Pharmaceutical ManufacturersAssociation
- Toyama Pharmaceutical Association
- Others (17 in total)

http<u>://</u>www.fpmaj.gr.jp/

FPMAJ consists of business based (14) associations and regional association (17).

22 members in Quality committee (5 JPMA out of 22 members)

Quality Committee of FPMAJ



- (1)Reviews matters relevant to pharmaceutical Good Quality Practice (GQP) and Good Manufacturing Practice (GMP).
- (2)Integrates GQP/GMP-related suggestions provided by relevant organizations and finds compromises between the organizations and administrative authorities.
- (3)Conducts GQP/GMP-related seminar, meeting and training.

Background of PIC/S GDP survey by FPMAJ



- Japan became a member of PIC/S in 1st July 2014.
- "PIC/S Guide to Good Distribution practice (GDP) for Medicinal Products PE 011-1" was issued on the basis of EU-GDP in June 2014. EU specific items were eliminated.
- While the EU GDP Guide is legally binding in the EU/EEA, the PIC/S GDP Guide is a non-binding guidance document in PIC/S, as not all PIC/S Participating Authorities are competent for GDP inspections.

→ Japanese health authority (MHLW) recognizes its importance and want to know the "gap" between current status and PIC/S GDP in Japanese distribution channel.

Assumed image of GDP from the authority



- MHLW requested FPMAJ to provide status update November, 2014.
- FPMAJ organized GDP WG and discussed the assumed image of the scope of GDP with MHLW in January, 2015.

(Scope: assumed image)

Product

- ✓ Ethical & proprietary drugs, active pharmaceutical ingredients
- ✓ May have applicability to investigational drugs.
- ✓ Not applied to quasi-drug, cosmetics, medical devices, excipients, reagents, labeling & packaging materials

Distribution:

- ✓ All processes from market release to patients
- ✓ The process from API to DP manufacturer should be taken into account.

• Temperature and humidity control:

✓ In principle, the storage condition described in a regulatory dossier has to be applied, but a risk-basis variance could be allowed.

PIC/S GDP survey by FPMAJ in 2015



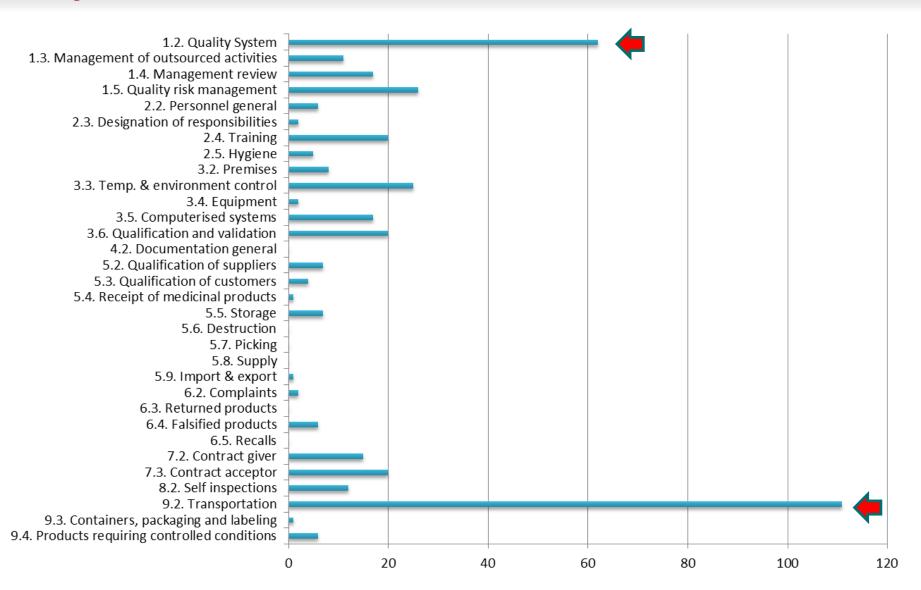
 Target: A member of FPMAJ and Japan Bulk Pharmaceutical Manufacturers Association (JBPMA).

Purpose : Gap analysis and concerned matters

- ullet Duration : 24 Mar. \sim 16 Apr., 2015
- Method: PRAISE-NET questionnaire summarize System
- Valid response: 226 companies

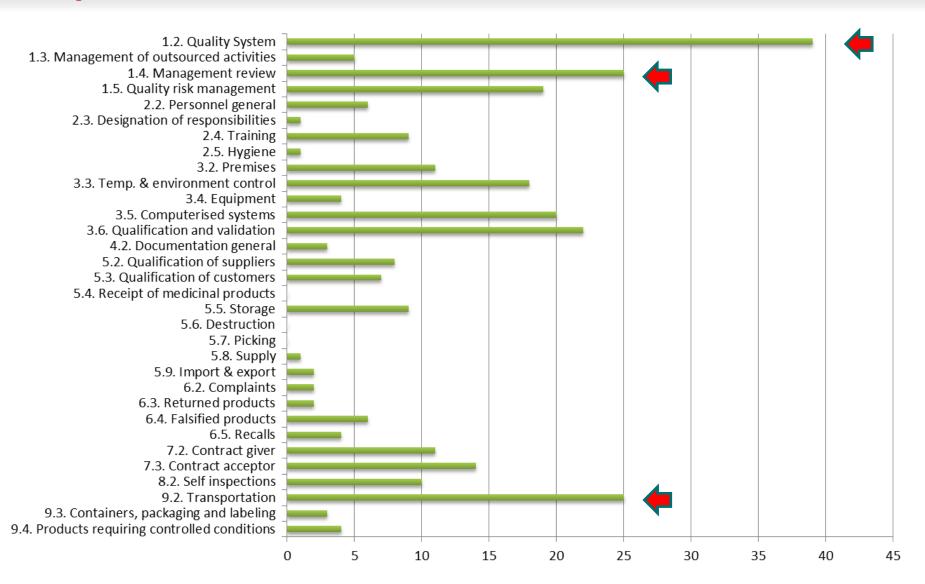


Gap or Concerned on Distributor





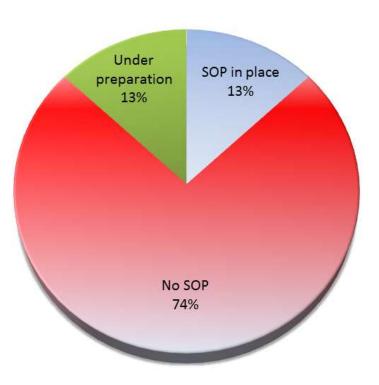
Gap or Concerned on Warehouse



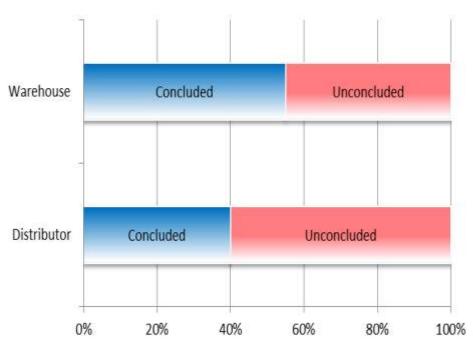
GDP related documents



GDP related documents



GDP quality agreement



Summary - Actions to be considered



- Temperature monitoring and deviation handling in transportation
 - ✓ Cooperation with contractors (warehouse, distributors)
 - ✓ Enhance soft & hard on monitoring
- Establishment of QMS and QRM
 - ✓ How to apply the existing GQP/GMP system and support
- Management Review and monitoring
 - ✓ Utilize the existing way
- Qualification and CSV
 - ✓ Temp. mapping etc.
 - ✓ Inventory assessment and evaluation
- Temp. & Environmental control
 - ✓ Utilize the existing system on GMP warehouse
- →MHLW is considering to legislate GDP in Japan until 2018 since the next PIC/S assessment to Japan is planned in 2019.

MHLW will organize Health Labor Sciences Research from April, 2016 to discuss and define the scope and responsibilities etc. of Japanese GDP.

韓国の医薬品製造の現<mark>況および</mark> GMP関連Issues

2016. 6. 23. シンプン製薬 キム・ジェファン faniekim@gmail.com

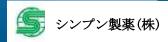
Contents

1. 医薬品製造の現況

- 1.1 医薬品市場の現況
- 1.2 医薬品生産高(完成/原薬)
- 1.3 完成医薬品における医療用医薬品と一般用医薬品の生産高
- 1.4 完成医薬品メーカーの規模別業者数および生産高
- 1.5 完成医薬品の薬効群別生産高
- 1.6 医薬品メーカーの職種別人材

2. GMP関連Issues

- ◆ 韓国のGMP History/KGMPの適用範囲
- ◆ 最近のGMPおよびQuality関連動力
- ◆ GMP関連Issues
- ♦ PMDA実査関連製薬会社



1.1 医薬品市場の現況

◆ 医薬品の総生産高は2014年に16.4兆ウォン、 2010年以後は年平均1.3%成長

(単位: 百万ウォン、%)

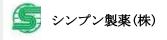
区分	2010年	2011年	2012年	2013年	2014年	CAGR (2010~2014)
生産	15, 569, 588	15, 440, 251	15, 560, 663	16, 191, 845	16, 419, 419	1.3
輸出	1, 770, 059	1, 943, 493	2, 309, 534	2, 318, 522	2, 531, 404	9. 4
輸入	5, 108, 911	5, 447, 053	5, 728, 874	5, 155, 829	5, 365, 903	1.2
市場規模	18, 908, 439	18, 943, 812	18, 890, 003	19, 029, 152	19, 253, 918	0.5

注:1) 市場規模は生産・輸出+輸入

2) 医薬品の範囲は完成医薬品、麻薬、医療用麻薬、向精神薬、医療品原薬

資料:1) 韓国製薬協会、医薬品など生産実績報告、各年度

2) 韓国医薬品輸出入協会、Facts & Survey Report、各年度



1.2 医薬品生産高(完成/原薬)

◆ 完成医薬品の生産高は2014年に14.3兆ウォン、 医療品原薬の生産高は2014年に2.1兆ウォン

(単位: 百万ウォン、%)

区分	2010年	2011年	2012年	2013年	2014年	CAGR (2010~2014)
完成医薬品	14, 234, 674	14, 109, 396	13, 749, 984	14, 132, 538	14, 280, 482	0. 1
医療品原薬	1, 334, 914	1, 330, 855	1, 810, 679	2, 059, 307	2, 138, 937	12.5
合 計	15, 569, 588	15, 440, 251	15, 560, 663	16, 191, 845	16, 419, 419	1.3

注:1) 完成医薬品:完成医薬品、麻薬、医療用麻薬、向精神薬を含める

2) 医療品原薬: 化学原料、漢方薬の原料、医療用高圧ガスなど

資料:韓国製薬協会、医薬品など生産実績報告、各年度

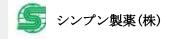
1.3 完成医薬品における医療用医薬品と一般用医薬品の生産高

◆ 医療用医薬品の生産高は2014年11.87兆ウォンで83.1%、 一般用医薬品の生産高は2014年2.41兆ウォンで16.9%

(単位:十億ウォン)

区分	2010年	2011年	2012年	2013年	2014年
医療用医薬品	11, 509. 8	11, 329. 0	11, 225. 8	11, 453. 4	11, 867. 5
一般用医薬品	2, 530. 9	2, 551. 8	2, 309. 7	2, 435. 4	2, 413. 0
合 計	14, 040. 7	13, 880. 8	13, 535. 5	13, 888. 8	14, 280. 5

資料:韓国製薬協会、医薬品など生産実績報告、各年度



1.4 完成医薬品メーカーの規模別業者数および生産高(2014年)

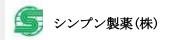
(単位: 箇所数、百万ウォン、%)

区 分	業者数	割合	生産高	割合
5,000億以上	5	1.6	2, 636, 867	18. 5
3,000億以上 ~ 5,000億未満	4	1. 3	1, 364, 259	9.6
1,000億以上 ~ 3,000億未満	32	10. 4	5, 394, 258	37.8
500億以上 ~ 1,000億未満	36	11.7	2, 399, 597	16.8
300億以上 ~ 500億未満	31	10. 1	1, 225, 549	8.6
100億以上 ~ 300億未満	51	16. 6	887, 291	6. 2
100億未満	148	48. 2	372, 661	2.5
合 計	307	100.0	14, 280, 482	100.0

注: 完成医薬品、麻薬、医療用麻薬、向精神薬に対する生産規模別現況

資料:1)韓国製薬協会、医薬品など生産実績報告、2015

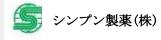
2) 韓国保健産業振興院、製薬産業分析報告書、2015



1.5 完成医薬品の薬効群別生産高1

(単位:百万ウォン、%)

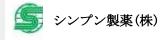
************************************	2013年		2014 l	前年対比	
薬効群	生産高	割合	生産高	割合	増減率
主としてグラム陽性・陰性菌に 作用するもの	1, 067, 440	7. 6	1, 076, 366	7. 5	0.8
血圧降下剤	1, 182, 871	8.4	1, 016, 330	7. 1	-14. 1
動脈硬化用剤	828, 996	5.9	915, 374	6.4	10.4
解熱剤、鎮痛剤、消炎剤	880, 965	6. 2	880, 595	6. 2	-0.0
消化性潰瘍用剤	793, 490	5.6	828, 188	5.8	4. 4
その他循環器系用薬	497, 983	3. 5	567, 661	4.0	14.0
血液製剤類	572, 546	4. 1	544, 716	3.8	-4.9
他に分類されない代謝性医薬品	388, 663	2.8	418, 874	2.9	7.8
その他化学療法剤	429, 906	3.0	406, 009	2.8	-5.6



1.5 完成医薬品の薬効群別生産高2

(単位: 百万ウォン、%)

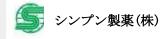
冰九平	2013年		2014年		前年対比	
薬効群	生産高	割合	生産高	割合	増減率	
その他中枢神経系用薬	389, 128	2.8	397, 817	2.8	2. 2	
精神神経用剤	303, 101	2. 1	375, 393	2.6	23. 9	
ワクチン類	394, 669	2.8	340, 061	2.4	-13.8	
鎮咳去痰剤	324, 321	2. 3	317, 574	2. 2	-2.1	
眼科用剤	284, 941	2.0	317, 294	2. 2	11. 4	
その他消化器官用薬	322, 168	2. 3	300, 730	2. 1	-6. 7	
糖尿病用剤	266, 288	1.9	261, 556	1.8	-1.8	
鎮痛剤、鎮痒剤、収斂剤、消炎剤	234, 534	1.7	247, 843	1.7	5. 7	
その他泌尿生殖器官および肛門用薬	253, 934	1.8	243, 293	1.7	-4. 2	



1.5 完成医薬品の薬効群別生産高3

(単位: 百万ウォン、%)

생. 사. 작	2013年	Ē	2014	前年対比	
薬効群	生産高	割合	生産高	割合	増減率
抗悪性腫瘍剤	242, 972	1. 7	228, 689	1.6	-5.9
X線造影剤	209, 862	1.5	202, 510	1.4	-3.5
その他血液・体液用薬	197, 902	1.4	199, 177	1.4	0.6
蛋白アミノ酸製剤	166, 564	1. 2	184, 188	1.3	10.6
血液代用剤	150, 765	1. 1	165, 349	1.2	9. 7
肝臓疾患用剤	174, 743	1. 2	164, 815	1.2	-5.7
抗ヒスタミン剤	150, 900	1. 1	150, 430	1.1	-0.3
歯科口腔用薬	149, 020	1.1	132. 899	0.9	-10.8



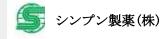
1.5 完成医薬品の薬効群別生産高4

(単位: 百万ウォン、%)

小小	2013年	2013年		2014年		
薬効群	生産高	割合	生産高	割合	増減率	
脳下垂体ホルモン剤	127, 668	0.9	125, 763	0.9	-1.5	
抗てんかん剤	119, 386	0.8	125, 422	0.9	5. 1	
その他ホルモン剤、抗ホルモン剤 を含める	106, 119	0.8	108, 375	0.8	2. 1	
血管拡張剤	83, 033	0.6	106, 801	0.7	28.6	
小計(上位30個の薬効群の合計)	11, 294, 881	79.9	11, 350, 092	79. 5	0.5	
完成医薬品の合計	14, 129, 868	100.0	14, 276, 268	100.0	1.0	
全医薬品の合計	16, 374, 461	_	16, 419, 419	_	0.3	

注: 完成医薬品を基準とし、麻薬類は除外する

資料: 韓国製薬協会、医薬品など生産実績報告、各年度



1.6 医薬品メーカーの職種別人材

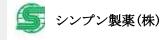
(単位: 名、%)

区 八	2012年		2013年		2014年	
区 分	人員	割合	人員	割合	人員	割合
事務職	15, 403	19. 7	16, 598	18. 7	17, 001	19. 0
営業職	24, 714	31. 6	25, 889	29. 2	25, 496	28. 4
研究職	9, 872	12.6	10, 613	12. 0	10, 594	11.8
生産職	24, 942	31. 9	28, 226	31. 9	29, 592	33.0
その他	3, 328	4.3	7, 219	8. 2	6, 966	7.8
合 計	78, 259	100.0	88, 545	100.0	89, 649	100.0

注:医薬品は完成医薬品、麻薬、向精神薬、医薬品原薬、医薬部外品を含める

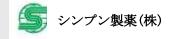
資料:1) 韓国製薬協会、医薬品など生産実績報告、2015

2) 韓国保健産業振興院、製薬産業分析報告書、2015



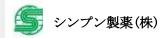
韓国のGMP History

- 1. 1963年 米FDA-cGMP 制定
- 2. 1969年 WHO GMP 制定
- 3. 1975年 WHO: 国際取引においてGMP証明制度を勧告
- 4. 1977年 3月 「優秀医薬品の製造管理基準(KGMP)」を制定・公布 (保健社会部例規第373号)
- 5. 1978年 7月 「KGMP施行指針」を発表、メーカーに対し自律のGMP実施を勧告
- 6. 1982年 「医薬品メーカーのKGMP実施状況評価表」を作成
- 7. 1984年 KGMP評価委員会を構成 (保健社会部5名、学界7名、製薬業界8名など計23名)
- 8. 1984年 7月 KGMP改正 適格メーカー評価手続きなどを追加 (保健社会部例規第482号)



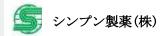
韓国のGMP History

- 9. 1985年 4月 KGMP実施適格メーカー評価開始(第1次指定)
- 10. 1992年 5月 施設基準令を改正 KGMPのHardware部分を吸収
- 11. 1994年 7月 医薬品製造および品質管理基準(KGMP)の義務付け (薬師法施行規則第22条別表 4)
- 12. 2008年 4月 品目別事前GMPおよびバリデーション制度を採択 (薬事法施行規則第24条別表 2)
- 13. 2012年 4月 PIC/S加盟申請書を提出
- 14. 2013年 3月 改正GMP(医薬品などの安全に関する規則第4条別表4)
- 15. 2014年 5月 PIC/Sの正式加盟国になる



KGMPの適用範囲

- ① 医薬品
- ② 医薬品原薬
- ③ 漢方薬の原料
- ④ 生物学的製剤など
- ⑤ 放射性医薬品
- ⑥ 医療用高圧ガス
- ⑦ 臨床試験用医薬品
- ⑧ 医薬部外品のなかで内用固形剤、内用液剤、軟膏剤、 皮膚に貼り付けるパップ剤

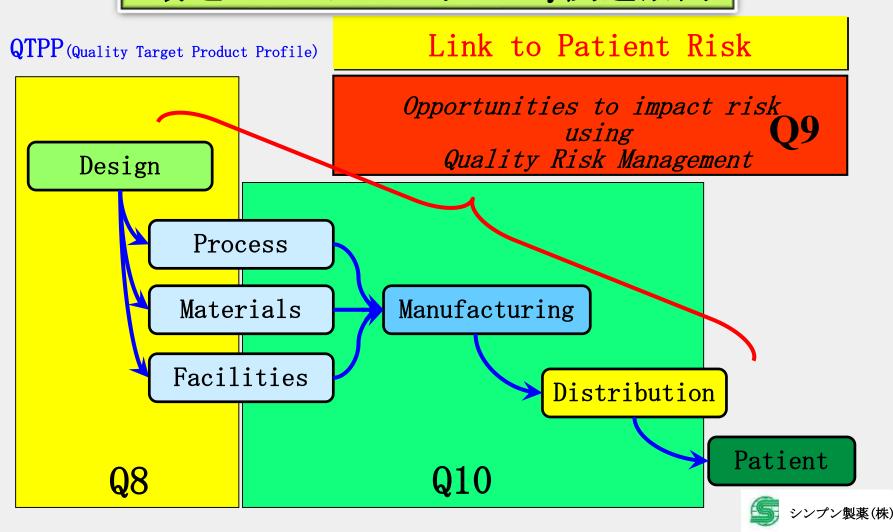


What is Pharmaceutical Quality?

- The suitability of either a drug substance or drug product for its intended use.
 This term includes such attributes as the identity, strength and purity (ICH Q6A)
- The degree to which a set of inherent properties
 of a product, system or process fulfills requirements
 (ICH Q9)
 Product & Process

Sources: A Regulatory Perspective on the Current and Future State of Pharmaceutical Quality, International Conference on Drug Development, FDA, 2013

最近のGMPおよびQuality関連動向



最近のGMPおよびQuality関連動向

Process Understanding CMC regulatory **Oversight** (Submission) CGMP regulatory **Q8** oversight (Inspection) & Company's **Q9** Quality system Post Approval Change (PAC) Risk (perceived & real)

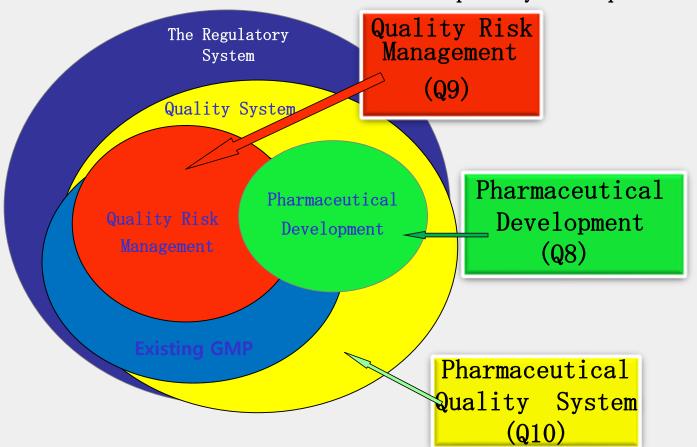
Process Understanding CMC regulatory Oversight (Submission) CGMP regulatory Q10 oversight (Inspections) & Company's **Q9** Quality system PAC to Continuous Improvement Risk

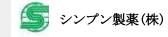
CONSIDERATIONS Process Understanding regulatory oversigh CGMP regulatory oversight Company's Quality system Continuous Risk



最近のGMPおよびQuality関連動向

Another diagram - The EU regulatory point of view on integration of different ICH quality concepts





Approach to Global GMP

It applies to the system supporting to the development and manufacture of different various dosage forms throughout the product life cycle.



Quality System

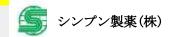
Production System

Packaging & Labeling System

Materials System

Laboratory Controls System

Facilities & Equipment System

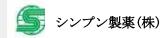


ICH Q8 Pharmaceutical Development

QbD (Quality by Design)

A systematic approach to development that begins with predefined objectives and emphasizes product and process understanding and process control, based on sound science and quality risk management.

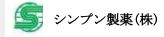
- 開発段階で
- 科学的根拠と品質リスクマネジメントを基盤に
- 製品とプロセスにに対して理解し、プロセス制御を強調し
- 事前に定義された目的を達成するための
- システム的アプローチ
- Quality by Design(QbD)の概念
 - QTPP(Quality Target Product Profile), CQA(Critical Quality Attribute), CPP(Critical Process Parameter), Control Strategy
 - DoE(Design of Experiment)とQRMの重要性
 - Design Spaceの概念導入および規制機関の柔軟性



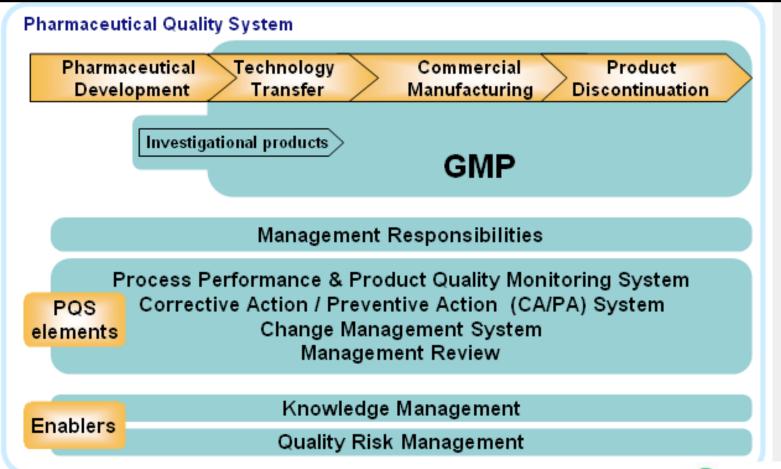
Principles of Quality Risk Management (ICH Q9)

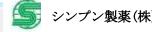
Two primary principles of quality risk management are:

- The evaluation of the risk to quality should be based on scientific knowledge and ultimately link to the protection of the patient; and
- The level of effort, formality, and documentation of the quality risk management process should be commensurate with the level of risk.



Pharmaceutical Quality System - ICH Q10





最近のGMPおよびQuality関連動向

ICH Q8, Q9 and Q10 Working Together

Formulation Activities:

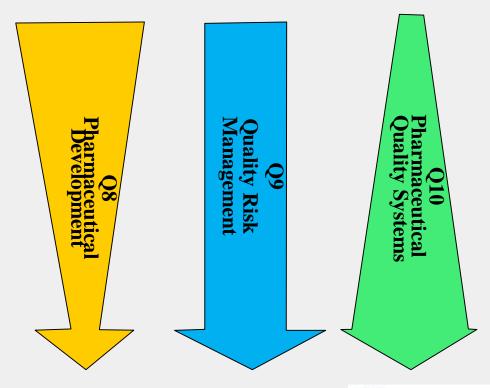
- QTPP Definition
- Pre-Formulation Studies
- · Formulation Screening
- Optimization & Selection

Process Development Activities:

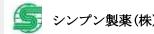
- Process Screening
- Lab Scale Development
- Scale-Up Studies

Manufacturing Activities:

- · Commercial Scale Manufacturing
- · Batch Release
- Continual Verification & Improvement



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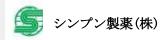


規制動向

- 1. Beta-lactam系抗生剤のなかで、ペニシリン製剤とセファロスポリン製剤のみを 作業所を分離するよう義務付けていたが、カルバペネム製剤とモノバクタム製剤の 作業所も分離することを義務付ける。(2018年施行)
- 2. 医療用医薬品に対する一連番号適用と出庫情報報告の義務付け : 2016年 7月施行
- 3. 食薬処のPIC/S加盟によるGMP認証更新制度の適用(3年ごとに)
- 4. 医薬品を許可する際、CTD提出の義務付け
- 5. 医薬品原薬の入庫時、包装単位を全数検査
- 6. 医薬品の同等性試験審査時、データ保全性関連審査を強化

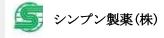
製薬業界の対応と難関

- 1. Beta-lactam系抗生剤のなかで、カルバペネム製剤とモノバクタム製剤に対する作業所分離義務付けの施行を追加(2018年施行)
- 2. 既存の業務に加え、医療用医薬品に対する一連番号適用と出庫情報報告など 新しい業務が追加したことにより、発生しうる問題(スキンエラー、誤配時の 対応など)が予想される



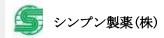
無菌製剤1

- 1. 無菌操作で無菌性保証において最も重要な要素の一つ 作業員、作業環境の管理
 - 人由来の汚染(Particulate, Organisms)
 - -> プロセスの自動化・無人化を推奨(ロボットを活用)、遮断技術(Barrier Technology)を活用
 - 人との接触を最小化
- 2. 製造環境の管理
 - 粉末注射剤の充填作業時のParticulate発生とClass Aの管理
 - Class A 地域である粉末注射剤充填エリアの風速を管理
- 3. 望ましい無菌操作方法 粉末注射剤の混合・充填する時
- 4. 無菌室作業員の教育訓練
 - 無菌服の洗濯、滅菌および着用方法の標準化
 - 無菌室での動き



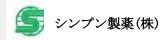
無菌製剤2

- 5. 滅菌後の無菌材料移動時の微生物汚染問題
- 6. 充填と滅菌の間の合理的な時間制限の根拠
- 7. Container/Closure Systemの完全性(Integrity)に対する検証の周期
- 8. Pure Steamの汚染源(Contaminants)関連試験の周期
- 9. 入庫された無菌原料の検体採取(全容器)方法
- 10. 無菌室の安全かつ完全な消毒方法 Formaldehyde, H2O2



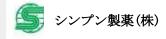
非無菌製剤

1. 多品種少量生産環境下での交差汚染(Cross Contamination)リスクを 最小化するために効果的な作業場のレイアウトと製造設備および洗浄方法、 洗浄バリデーション(特に内用固形剤作業所)



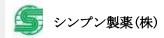
医薬品原薬(無菌医薬品原薬)

- 1. 無菌操作で無菌性保証において最も重要な要素 作業員、作業環境の管理
 - 人由来の汚染(Particles, Organisms)
 - -> プロセスの自動化・無人化(ロボットを活用)、遮断技術(Barrier Technology) を活用
 - 人との接触を最小化
- 2. 粉末注射用の無菌医薬品原薬 無菌条件下で医薬品原薬の結晶化、ろ過、乾燥、 粉砕操作の過程で、微生物除去工程がない
- 3. 滅菌後の無菌材料移動時の微生物汚染問題
- 4. 無菌室作業員の教育訓練
 - 無菌服の洗濯、滅菌および着用方法の標準化
 - 無菌室、無菌操作区域での動き
- 5. Pure Steamの汚染源(Contaminants)関連試験の周期
- 6. 無菌室の安全かつ完全な消毒方法 Formaldehyde, H2O2



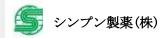
その他

- 1. 効率的な校正(Calibration)方法 校正対象別の合理的な校正の周期
- 2. 合理的な製造単位設定方法 : 糖衣機の容量 / 輸液剤の滅菌
- 3. 主な原材料供給業者の適格性評価および管理方法
- 4. 医薬品原薬の製造のための購入原料会社のGMP承認の可否
- 5. 完成医薬品用原料秤量室の効果的な交差汚染防止対策および管理方法



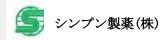
PIC/S加盟関連変更事項

- 1. 医薬品原薬、臨床試験用医薬品の製造および品質管理基準の新設(別表1の2、別表4の2)
- 2. 放射性医薬品、医療用高圧ガスの製造および品質管理基準の遵守の義務付け (別表3の2、別表3の3)
- 3. 医薬品の製造および品質管理基準の改善 無菌製剤でなく生薬製剤に対するバリデーションと市販後の安全性試験の義務付け
- 4. 製造販売・輸入品目を許可する際、医薬品の製造および品質管理基準の評価対象の拡大
 - 希少医薬品、標準製造基準医薬品、放射性医薬品、医療用高圧ガスの製造販売・輸入 品目の許可申請の時、医薬品の製造および品質管理基準の実施状況に関する評価資料 を提出
- 5. 食品医薬品安全処による医薬品の許可と審評院による保険薬価評価を連携する制度の導入



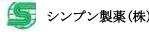
両国間の検討要望事項

- 1. PIC/s加盟を契機に、韓日両国間で許可機関の実査報告書を互いに承認しあう 相互承認協定(MRA)の締結
- 2. 両国間で公定書の相互承認、または共通(USP, EP)の承認書の活用
- 3. 許可後の変更事項に対する両国間変更申告ガイドの統一

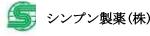


承認区分・登録	会社名	承認区分・登録	会社名
	シンプン製薬 安山工場 ST Pharm Co., Ltd.	Ilshin Chemical Co., Ltd	
		Hanmi Fine Chemical Co., Ltd	
	Estechphama Co., Ltd.		Henkel Home Care Korea
	Inist ST Co., Ltd.		Sam-Oh Pharm. Co., Ltd.
	JW中外 <u>製薬</u> 唐津工場、始華工場、水原工場		柳韓洋行
医薬品一般	コーロン生命科学 陰城工場	医薬品一般	ヨンジン薬品 南陽工場、完州工場
	コルマーファーマ		同和薬品(株)
	Hawon Biochem. Science Co.		Hanseochem Co., Ltd.
	韓国大塚製薬 郷南工場 キョンボ製薬	Samsung Fine Chem. Co., Ltd 仁川工場	
		ファイル薬品(株)	
	SS Pharm Co., Ltd		鐘根堂 天安工場

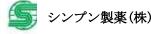
承認区分・登録	会社名	承認区分・登録	会社名
	KPX Life Science 麗水工場 保寧製薬 ヨンジン薬品 烏山工場 国際薬品 Yonsung Fine Chemicals 華城工場	一同製薬	
		(株)一和 九里工場	
		ヨンジン薬品 完州工場	
			Pharmacostech 華城工場
			Reyon Pharm. Co., Ltd. 鎮川工場
医薬品一般	広東製薬	医薬品一般	CJヘルスケア 大所工場
	第一薬品		韓美薬品 セパ工場
	東国製薬		CKD Bio Corporation
	デウンバイオ Yuil Pharm Tech. Co., Ltd	ユヨン製薬	
		Estechpharma Co., Ltd 発安工場	
	ユハン化学		Dong Kook Fine Chem. Co., Ltd.



承認区分•登録	会社名	承認区分・登録	会社名
	草堂薬品		(株)ポラク
	UK Chemipharm Co., Ltd.		東亜ST 半月工場
	大象(株) 群山工場		Chemtros Co., Ltd.
	Samyang Biopharmaceutical Corp.		Enzychem Co., Ltd.
	タサンメディカム		Kukbo Science Co., Ltd.
医薬品一般	DaeHe Biopharma Co., Ltd	医薬品一般	Reyon Pharm. Co., Ltd. 鎮川工場
	Korea Ginseng Factory		韓独
	ソフン		テボンLS(株) 工場
	韓国新薬		韓美薬品
	シミック CMO Korea(株)		ハナ製薬
	HL Genomics		京東製薬 発安工場



承認区分・登録	会社名	承認区分・登録	会社名
医薬品一般	コーロン製薬 大田工場	医薬品無菌医薬品	柳韓洋行
	LG生命科学 温山工場		JW製薬 水原工場、始華工場、唐津工場
	Kolon Life Science 忠州工場		アジュ薬品 平沢工場
	サムジン製薬		京東製薬
	テファ製薬の郷南工場		Hanmi Fine Chemical Co., Ltd.
	CJヘルスケア 大所工場		キョンボ製薬
	韓国コルマー		ヨンジン薬品 南陽工場、烏山工場
	CL Pharm Co., Ltd. 牙山工場		鐘根堂 天安工場
	ククジョン薬品 郷南工場		保寧製薬
	セルトリオン製薬		国際薬品
	SPC Co., Ltd. など		第一薬品

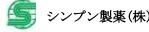


承認区分・登録	会社名	承認区分・登録	会社名
医薬品無菌医薬品	シンプン製薬 - 安山工場、安山2工場	医薬品無菌医薬品	ヒューオンス
	東国製薬		UK Chemipharm Co., Ltd.
	デウンバイオ		イルソン新薬
	ユハン化学		Samyang Biopharmaceuticals Corp.
	ハイテクファーム		ハンリム製薬
	Reyon Pharm. Co., Ltd. 鎮川工場		韓美薬品
	ペンミックス 天安工場		BC World製薬 驪州工場
	CJ ヘルスケア - 大所工場、利川 2 工場		一同製薬 安城工場
	韓美薬品 セパ工場		セルトリオン 2工場
	ユヨン製薬		東亜ST 天安工場
	サミル製薬		バイネックス シンプン製薬(株)

承認区分・登録	会社名	承認区分・登録	会社名
医薬品無菌医薬品	JW生命科学	医薬品 生物学的製剤など	Green Cross WellBeing Corporation
	Mitsubishi Tanabe Pharma Korea Co., Ltd.		Celltrion Plant 1
	SPC Co., Ltd.		Binex Co., Ltd.

韓国の製薬会社のうち、今後、日本PMDAから実査を受けることを望む会社

会社名	実査対象	会社名	実査対象
LG生命科学	抗体医薬品(Biosimilars)		
	(医薬品原薬および完成医薬品)		





ありがとうございました。