

THE 2nd INDONESIA-JAPAN SYMPOSIUM ON: ENSURING AND ENHANCING QUALITY ASSURANCE of MEDICAL PRODUCTS



Deputy Chairman for Therapeutic Products, Narcotics, Psychotropics, and Addictive Substances Control

NADFC - INDONESIA 21 MAY 2014

Outline

Quality Assurance of Medicine,
 Regulatory framework

Risk Management

 Supply chain integrity and Product Recall

Regulatory Framework on Ensuring Q,S, E of Medicine

Quality Assurance

Q, **S**, **E**

Documentation, Monitoring, and Evaluation

Pre Marketing
Assessment
(marketing
authorization/
licensing and
registration)

Regulatory Elements

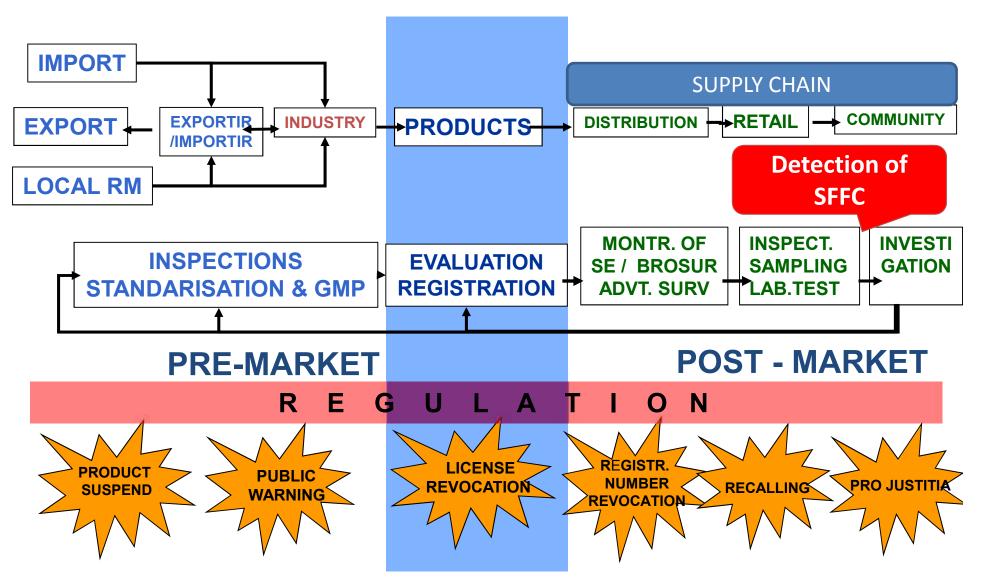
(full spectrum/ comprehensive functions including, inspection, recall, central & provincial lab) Technical Elements

(quality specifications, Basic tests, GMP, GLP, GPP, GDP, GSP, GCP) Post-marketing surveillance

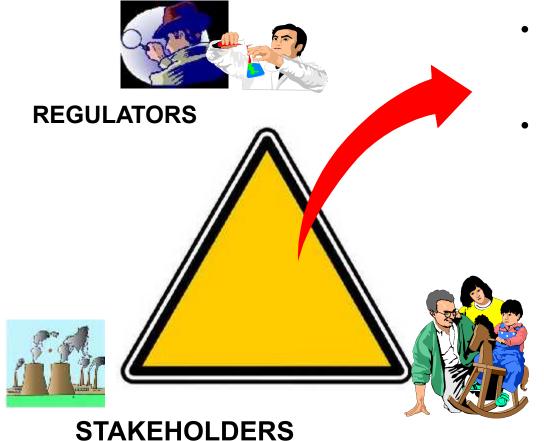
(for quality, adverse events, and product information, promotion)

Adequate legislation and law enforcement

DRUG CONTROL SYSTEM IN INDONESIA



CONTROL FUNCTIONS SYSTEM



- NADFC ensuring Quality, Safety, Eficacy of Marketed Drug
- Stakeholders responsible on their products
- Consumers able to protect themself from risky product

Risk communication is a key!

CONSUMERS



QUALITY ASSURANCE IN THE BUSINESS PROCESS NADFC Implementation of QMS





Quality Management Principles

- A comprehensive and fundamental rule or belief,
- For leading and operating an organization
- Aimed at continually improving performance over the long term
- Focusing on customers
- Addressing the needs of all other stakeholders



ACHIEVEMENT in QMS UP TO 2013

2009

2010

2011

2012

2013

QMS

Budget
planning for
recruitment
of QMS
consultant in
2010

Recruitment of Consultant for:

- Unit Mapping based on 5 QMS phase
- Identification and analysis of NADFC Head Office

 Identification and analysis of NADFC regional office

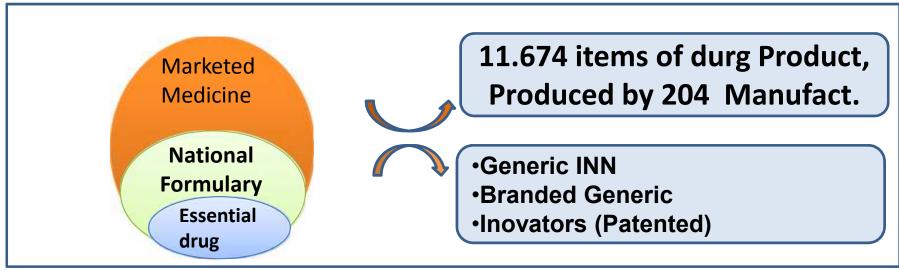
 Planning and development on QMS in NADFC Implementation of QMS in NADFC

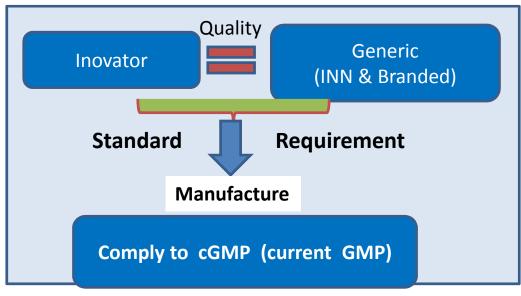
 Certified by URS since 31 January 2012 for ISO 9001:2008 Re-audit for implementation of using ISO 9001:2008
 standards

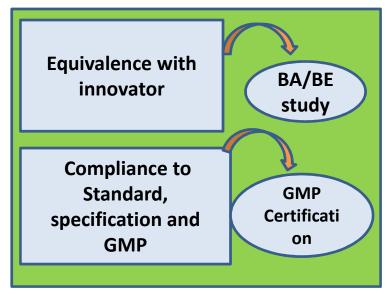
- In October 2011 QMS implemented in all level
- Audit for Certification on 5 January-28 February 2012 :
 - ✓ 24 units in NADFC
 - √ 30 Regional offices
- Certificate ISO 9001:2008 by United Registrar of Systems (URS), obtained on 31 January 2012 (for some units in NADFC).
- At present all units have obtained certificate ISO 9001:2008, next audit will be based on 9001:2012



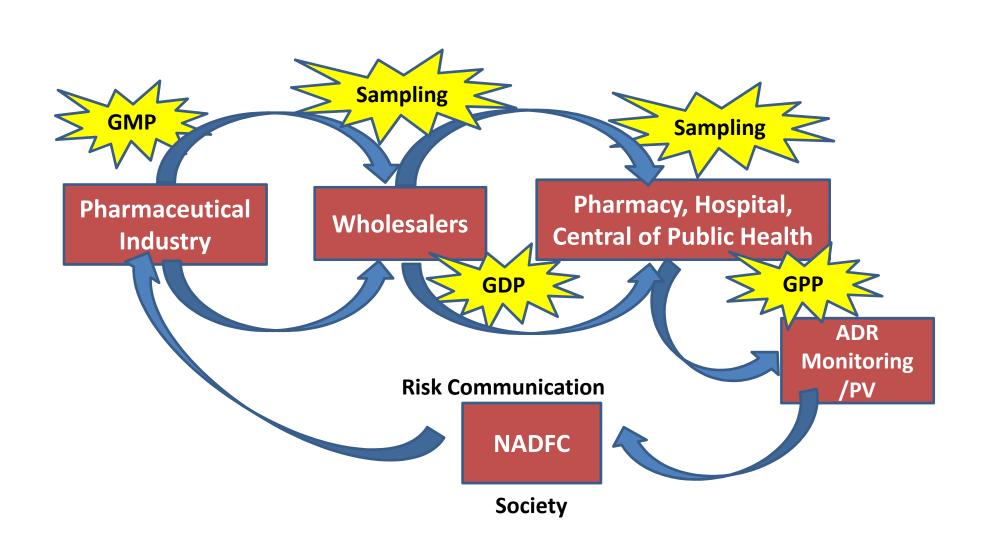
Quality Assurance Scope and situation







RISK BASED SURVEILANCE AND AUDIT FOR SAFETY AND QUALITY OF PRODUCT



RISK BASED CONTROL SYSTEM BADAN FOM

- Program planning should consider the maximum risk mitigation/elimination using real capacity and resources
- Develope a roadmap to guide the Action and to evaluate as well to adjust the speed toward the target outcome
- Periodic evaluation should also measure the outcome that give impact to public protection.

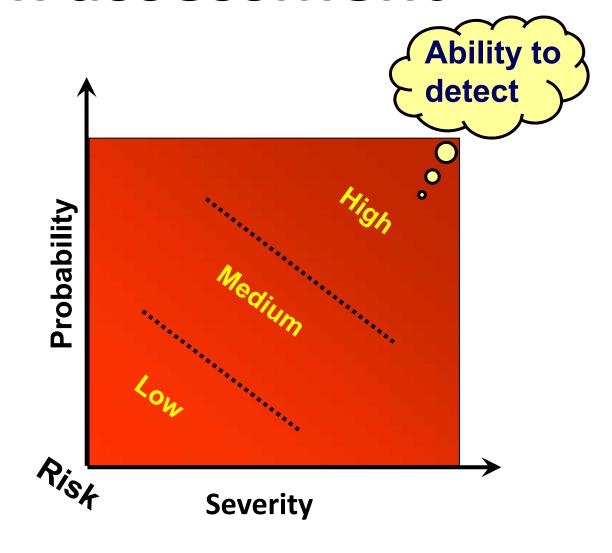
Impact assessment : analyze the achievement vs Risk managed

Risk assessment

Risk parameter to measure detectability



Risk ranking and priority to be mitigated



Quality Risk Management

- This Quality Risk Management methodology is a simple tool that allows Inspectorates to assign a relative risk rating to manufacturers when planning the routine inspection program for those sites.
- The risk ratings that are generated using this methodology may then be used by the Inspectorate to assign a frequency to the routine inspections that will be performed at the various manufacturers under its supervision.
- The risk ratings that are assigned to sites are based on an assessment of two different kinds of risk - an intrinsic risk and a compliance-related risk.

Type of risk

- The intrinsic risk estimated for a site reflects the complexity of the site, its processes and products as well as the criticality of the products or services provided by the site including from a supply perspective.
- The compliance-related risk that is estimated for the site reflects the GMP compliance status of the site immediately following the most recent routine inspection at the site. When this risk is being estimated, the classification and number of deficiencies identified at the last inspection are taken into account.

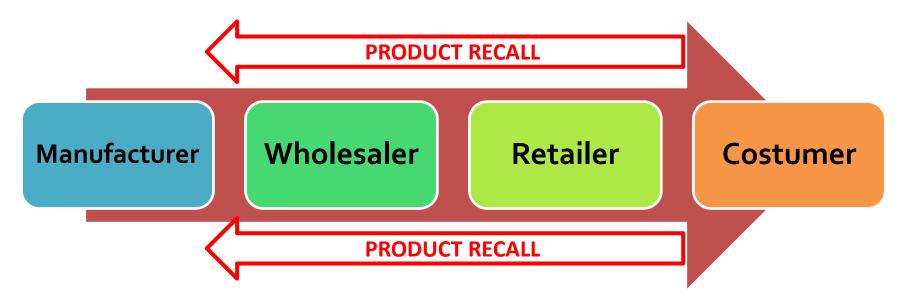
Regulatory challenges in risk based surveilance and audit

- Number and competency of inspectors
- Level of sites compliances in the supply chains
- Variety of product and advance technology
- Support of good training system
- Support og good laboratory facility
- Dynamic global standard
- Benchmarking and networking among regulators

Challenges of Supply Chain Integrity

Through all DISTRIBUTION CHANNELS

All the organizations that facilitate the pass through of product between its point of production and consumption



SITUATION: Archipelago of 17.000 islands; Air transport are not cover all potential economic cities; high mobility people, rivers and unattended islands could be risks of illegal trading

Supply Chain Control



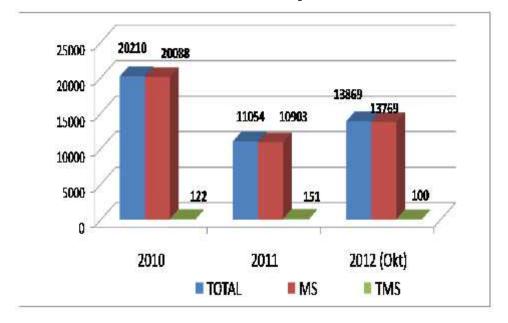
Activities:

- Inspection to Wholesalers, Pharmacies, Hospitals, Clinics and Drug stores to ensure good distribution practices
- Sampling of product from the market as a part of Regulatory quality control
- Surveilance for early detection of illegal/counterfeit pharmaceutical products
- Investigation to track and trace back of counterfeit and illegal supplier

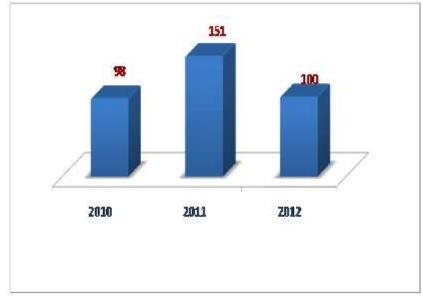
Penalties:	Year	Discovered Counterfeit Drugs	Discovered Drugs which illegally marketed
 Administrative sanctions 	2009	22	121
Withdrawn of	2010	10	36
license Public warnings	2011	8	67
Pro Justitia	2012	5	96
	2013	13	159

Trend of product RECALL (items) 2010 - 2012

Total sampled



Total items recalled



SUMMARY

- Quality assurance of Medicine should consider comprehensive commitment from Regulator-Product key player – Public
- Regulatory risk based Control function should be implemented in the frame work of Quality management system
- Patients or consumer will be the most protected from any risk of the product as a reason of product recall

