Rapid announcement of inspectional observations

< ORANGE* Letter >

Pharmaceuticals and Medical Devices Agency

** Observed Regulatory Attention / Notification of GMP Elements*

Mislabeling of the products caused by the violation of procedures

<< Related GMP Ministerial Ordinance Clause: Article 10 >>**

** GMP Ministerial Ordinance: Ministerial Ordinance on Standards for Manufacturing Control and Quality Control for Drugs and Quasi-drugs (MHLW Ministerial Ordinance No. 179 dated December 24, 2004)

Observation

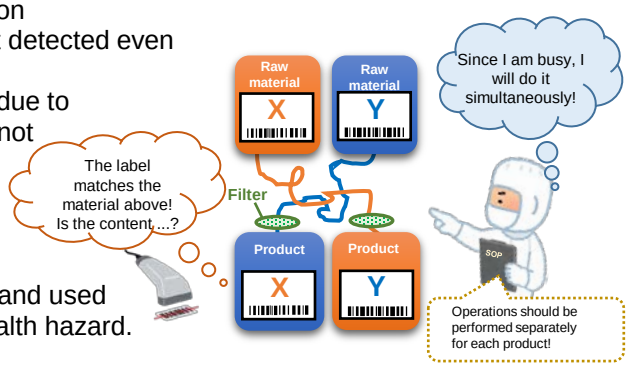
A label for different product was attached to the product.

< Background >

- GMP Ministerial Ordinance stipulates that operations related to manufacturing control must be performed according to documented procedures, etc.
- The procedure at the manufacturing site specifies to perform the following series of operations for each product in order to prevent any mix-up.
  - [1] Connect the raw material container to the empty product container, and transfer the raw material to the product container through the filter to remove impurities.
  - [2] Attach a barcoded label to the product container, and verify the barcode of the label with that on the raw material container.
  - [3] Cut off the joint from the product container and ship the product.

< Actually observed situation >

- A product manufactured at the manufacturing site had a label different from the content.
- Mislabeling occurred due to a mix-up of labels among products because a series of operations involving multiple products were performed simultaneously in violation of the provisions of the procedure. (Labelling error was not detected even by barcode)
- The description of the procedures remained to be unclear due to chronic personnel shortage, etc., and many operators did not comply with the procedures (assignment of operations outside their responsibility, implementation of operations before issuance of manufacturing instructions, etc.).



< Possible problem and risk >

- If a drug with a label different from the content is released and used according to the false label, there is a risk of significant health hazard.

(In Japan /drug product manufacturing site)

Check Point

- ☐ Are the risks that could occur due to non-compliance with procedures effectively communicated throughout the manufacturing site?
- ☐ Is the description of the procedures clear and specific? (Is there any description that can be interpreted differently depending on the operator?)
- ☐ Are there sufficient personnel to perform operations in compliance with the procedure?
- ☐ Is there a mechanism to detect and track human errors and defects in the subsequent checking and reviewing process ? (Is there any overconfidence in the system?)

Compliance with procedures = protection of "patients" and "yourself"

- ✓ The information about the drug should be properly communicated to the user to ensure that the patient does not take a different medication or misuse the drug. To achieve this, the principle is to ensure that the drug is accurately labeled. Even for high-quality drugs, products with incorrect labeling do nothing but harm for patients.
- ✓ A human error is something that can occur anytime and anywhere. It does not mean that the procedure should describe unnecessarily in detail. It is more effective for minimizing human errors to establish procedures and systems which enable operators to understand the purpose of the operations and accomplish their roles without difficulties.