QMS regulation in Japan

Office of Manufacturing/Quality and Compliance
As of 1st April, 2015
Manufacturing/Quality and Compliance

GMP

QA of GMP/QMS

QMS

RCB supervision


Issued on 1st April, 2015.
Main Topics

1. Definition .................................................................................................................. p.3
2. Overview of QMS regulation change ................................................................. p.6
3. Type of QMS inspection ......................................................................................... p.8
4. Scope of mfg. site registration and QMS inspection .............................................. p.12
5. QMS inspection ....................................................................................................... p.22
   5.1. Application of QMS ......................................................................................... p.25
   5.2. Determination of on-site or desktop inspection .............................................. p.28
   5.3. On-site inspection ........................................................................................... p.31
   5.4. Desktop inspection .......................................................................................... p.36
   5.5. Conformity assessment .................................................................................... p.39

Issued on 1st April, 2015.
1. Definition
License, Registration, Approval

Marketing license
– a requirement for marketing any medical devices and IVDs in Japan. Thus, all the marketing authorization holders (MAHs) shall have this license.

Manufacturing site registration (“Toroku”)
– a requirement for conducting specified manufacturing processes. In the case of medical devices, design, main assembling, sterilization and domestic (Japan) distribution site shall be registered.

Marketing approval (“Shonin”)
– a requirement for any medical devices and IVDs marketed in Japan. When applying for marketing approval of a new medical device or IVD or partial changes of authorized items hereto, QMS inspection application is also required. The QMS inspection application is required every 5 years to maintain existing marketing approval.

Issued on 1st April, 2015.
Exceptional Marketing Authorization

**Marketing Authorization Holder : MAH ("Seihan")**
A person who obtains the marketing license. MAH shall supervise and manage the manufacturer, and ensure the compliance with QMS of all manufacturing sites. Ensure proper product release to the market. MAH must be based in Japan.

**Foreign restrictive authorization holder : FRAH**
A foreign manufacturer who obtains the marketing approvals of medical devices in foreign country. FRAH may designate licensed MAH in Japan and have it market the product.

**Designated MAH : DMAH ("Sennin seihan")**
MAH designated by FRAH to conduct required quality control duties inside Japan. FRAH shall have D-MAH take necessary measures for the prevention of occurrence of hazards to the public health and hygiene in Japan caused by the product.

MAH
- marketing authorization
- domestic quality control duties

FRAH + DMAH
- marketing authorization
- domestic quality control duties

Issued on 1st April, 2015.
2. Overview of QMS Regulation Change
QMS regulation change under the revision of PAL

- Revised law went into effect in 25th Nov. 2014.
- Change of QMS inspection authority (see topic 3)
- Scope of Certification Standards will be expanded (see topic 3)
- Manufacturer’s License and Accreditation to Registration (see topic 4)
- Revision of QMS Ordinance
  - QMS inspection per product family (see topic 4)
  - 2nd Chapter became harmonized to ISO13485 (see topic 5)
  - QMS inspection applied to Market Authorization Holder (MAH) (see topic 5.1)

Issued on 1st April, 2015.
3. Type of QMS Inspection
QMS Inspections

- Application for approval
  - Regulatory Review
    - Pre-approval inspection
      - One of the requirements for marketing approval of medical device
      - Based on application
      - Conducted per Product Family
  - Approval
    - Post-approval inspection
      - Conducted every five years after obtaining marketing approval
- Marketing
  - Every 5 years

Issued on 1st April, 2015.
Type of QMS Inspection

1. Pre-approval inspection
   Required before the marketing approval.

2. Pre-partial change approval inspection
   Required before the partial change approval.
   Inspection scope is MAH and the change-related sites.

3. Periodic post-approval inspection
   Required for maintaining marketing approval every 5 years since the initial marketing approval.

4. Additional inspection
   Required for the notified cases. ex) specialized inspection for biological products, micro machine and medical devices utilizing nano-materials etc..
## QMS Inspection Authority

<table>
<thead>
<tr>
<th>Product</th>
<th>Inspection Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Medical Devices</strong></td>
<td></td>
</tr>
<tr>
<td>• Class IV</td>
<td>PMDA</td>
</tr>
<tr>
<td>• New medical devices</td>
<td></td>
</tr>
<tr>
<td>• Cell / Tissue-based medical devices</td>
<td></td>
</tr>
<tr>
<td>• Class III and Class II (without CS*)</td>
<td></td>
</tr>
<tr>
<td>• Class III and Class II (with CS*)</td>
<td>Registered certification body</td>
</tr>
<tr>
<td><strong>IVDs</strong></td>
<td></td>
</tr>
<tr>
<td>• New drugs</td>
<td>PMDA</td>
</tr>
<tr>
<td>• Radioactive drugs</td>
<td></td>
</tr>
<tr>
<td>• Products without CS*</td>
<td></td>
</tr>
<tr>
<td>• Products with CS*</td>
<td>Registered certification body</td>
</tr>
</tbody>
</table>

*CS : Certification Standards

Issued on 1st April, 2015.
4. Scope of mfg. site registration
   QMS inspection
Manufacturing site Registration

Sites listed below are required to register for each products.

<table>
<thead>
<tr>
<th>Site</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design Facility</td>
<td>(1) maintain records of design and development, and</td>
</tr>
<tr>
<td></td>
<td>(2) the responsible person should work here</td>
</tr>
<tr>
<td>Main Assembling Plant</td>
<td>(1) mainly responsible for QMS or</td>
</tr>
<tr>
<td></td>
<td>product realization of the products, and</td>
</tr>
<tr>
<td></td>
<td>(2) implement assembling(filling) processes.</td>
</tr>
<tr>
<td>Sterilizer</td>
<td>(1) implement sterilization process</td>
</tr>
<tr>
<td>Domestic (Japan) Distribution Center</td>
<td>(1) Storage and final release of the products to Japanese market.</td>
</tr>
</tbody>
</table>
### Scope of Registration and Inspection

<table>
<thead>
<tr>
<th>Facility</th>
<th>Registration</th>
<th>QMS Inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MAH</strong> (Marketing Authorization Holder)</td>
<td>N/A</td>
<td>Required</td>
</tr>
<tr>
<td><strong>Design Facility</strong></td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td><strong>Main Assembling Plant</strong></td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td><strong>Sterilizer</strong></td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td><strong>Domestic (Japan) Distribution Center</strong></td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td><strong>Other sites</strong></td>
<td>Not Required</td>
<td>Depends</td>
</tr>
</tbody>
</table>

- **MAH** and **Sterilizer** require registration only for sterile medical devices.
- **Other sites** do not require registration.
- **PMDA** determines QMS inspection requirements based on risk assessment.

*Issued on 1st April, 2015.*
4. Scope of mfg. site registration and QMS inspection, and products

Example of mfg. site registration

Registration

- Design & Development: Required
- Supplier: Not Required
- Sub-Assembly: Not Required
- Main Assembly: Required
- Packing: Not Required
- Distribution: Required

in Japan

in other country

Issued on 1st April, 2015.
Manufacturer needs “Registration” before the QMS inspection is conducted.

License and Accreditation of manufacturer changed to Registration.

BFR(Buildings and Facilities Regulation) conformity was one of the prerequisites for License and Accreditation, but now NOT for Registration.

### Before Revision vs After Revision

<table>
<thead>
<tr>
<th></th>
<th>Before Revision</th>
<th>After Revision</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Licensing system</strong></td>
<td>License (Domestic)</td>
<td>Registration (Domestic, Foreign)</td>
</tr>
<tr>
<td></td>
<td>Accreditation (Foreign)</td>
<td></td>
</tr>
<tr>
<td><strong>Authority to provide license</strong></td>
<td>Prefecture (Domestic)</td>
<td>Prefecture (Domestic)</td>
</tr>
<tr>
<td></td>
<td>MHLW (Biological, Foreign)</td>
<td>MHLW (Foreign)</td>
</tr>
<tr>
<td><strong>Category</strong></td>
<td>General, Sterilization, Biological, Packaging</td>
<td>None</td>
</tr>
<tr>
<td><strong>Requirements for licensing</strong></td>
<td>Reasons for disqualification (Health, Crime, Revocation)</td>
<td>Reasons for disqualification (Health, Crime, Revocation)</td>
</tr>
<tr>
<td></td>
<td>Facilities requirement</td>
<td>None</td>
</tr>
</tbody>
</table>

Issued on 1st April, 2015.
Application Materials for Registration

- Application for Registration (Form No.63-5)
- Document that states an applicant is not intoxicated person
- Curriculum vitae of the representative in the facility
- Registered premises and/or areas with drawings and/or bird’s eye-views
Product Families

QMS inspection is conducted per “Product Family”

- Generic names of Medical Devices and IVDs are grouped into “Product Families” depending on factors such as mfg. process, characteristics, usage method, risk etc..

- The relationship between product family and generic name will be announced by notification [1]

Product Family A
- Generic Name 1
- Generic Name 2
- Generic Name 3

Product Family B
- Generic Name 11
- Generic Name 12
- Generic Name 13

Product Family consists of some Generic Names

-  

Issued on 1st April, 2015.
Exception of Product Families

However…

- Products having generic names not grouped into product family: QMS inspection per generic name
- High risk product: QMS inspection per product (specified in public notice [2])
4. Scope of mfg. site registration and QMS inspection, and products

QMS Inspection is conducted per...

Medical Devices and In-Vitro Diagnostics (Class II~IV)

- per Product (High risk Product)
- per Generic name (not grouped into product family)
- per Product Family
Product Families

<table>
<thead>
<tr>
<th>Product Families: Class IV</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Class IV Product Family is established by Japanese original definition.</td>
</tr>
<tr>
<td>● Examples of product families:</td>
</tr>
<tr>
<td>Stent</td>
</tr>
<tr>
<td>Stent graft</td>
</tr>
<tr>
<td>Active catheter</td>
</tr>
<tr>
<td>Cardiac pacemaker and defibrillator</td>
</tr>
<tr>
<td>Ventricular assist device</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product Families: Class II / III</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Class II / III Product Family refer to NBOG BPG 2009-3.</td>
</tr>
<tr>
<td>● Examples of product families:</td>
</tr>
<tr>
<td>Non-active instruments (MD 0106)</td>
</tr>
<tr>
<td>Non-active cardiovascular implants (MD 0201)</td>
</tr>
<tr>
<td>Non-active dental equipment and instruments (MD 0401)</td>
</tr>
<tr>
<td>Devices for stimulation or inhibition (MD 1103)</td>
</tr>
<tr>
<td>Imaging devices utilizing ionizing radiation (MD 1201)</td>
</tr>
</tbody>
</table>
5. QMS Inspection
Revision of QMS Ordinance

Before Revision

QMS ordinance
(ISO13485 + Additional Requirements)

Harmonized to ISO13485
Chapter 2

Additional Requirements
Chapter 3

Outsourcing, etc.
Chapter 6

After Revision

 marketed approval

Manufacturer accreditation

Building and Facility Regulation

Marketing license

GQP ordinance

New QMS ordinance

※ Chapter 4 and 5 provide for requirements of building and facility for manufacturer of biological medical devices and radioactive IVDs.

Issued on 1st April, 2015.
# Contents of New QMS ordinance

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Title</th>
<th>Article</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>General Provisions</td>
<td>1~3</td>
</tr>
<tr>
<td>2</td>
<td>Medical Devices Manufacturing</td>
<td>4~64</td>
</tr>
<tr>
<td></td>
<td>Harmonized to ISO13485:2003</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Additional Requirements.</td>
<td>65~72-3</td>
</tr>
<tr>
<td>4</td>
<td>Biological-origin Medical Device, etc. Manufacturers (Domestic, Foreign)</td>
<td>73~79</td>
</tr>
<tr>
<td></td>
<td>Additional requirements according to the characteristics of the products</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>In-Vitro Diagnostic Radioactive Reagents Manufacturers(Domestic, Foreign)</td>
<td>80~81</td>
</tr>
<tr>
<td></td>
<td>Additional requirements according to the characteristics of the products</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Provisions Applied <em>Mutatis Mutandis</em> of Medical Device, etc. Manufacturing Sites, etc.</td>
<td>82~84</td>
</tr>
</tbody>
</table>

Issued on 1st April, 2015.
Overview of QMS inspection flow

- Receive application of QMS inspection
- Determine on-site or desktop inspection
- On-site Inspection
  - MAH *
  - Mfg. site A * (Assembly)
- Desktop Inspection
  - Mfg. site B * (Design)
  - Mfg. site C * (Distribution)
- Conformity assessment
- Issue Compliance certification and inspection report

*: Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2..

Issued on 1st April, 2015.
5.1. Application of QMS inspection

Overview of QMS inspection flow

- Receive application of QMS inspection
- Determine on-site or desktop inspection
  - On-site Inspection
    - MAH *
    - Mfg. site A * (Assembly)
  - Desktop Inspection
    - Mfg. site B * (Design)
    - Mfg. site C * (Distribution)
- Conformity assessment
- Issue Compliance certification and inspection report

*: Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2.

Issued on 1st April, 2015.
## Documents for QMS application

<table>
<thead>
<tr>
<th>No.</th>
<th>Documents</th>
<th>Scope</th>
<th>Pre-Approval/Pre-Partial</th>
<th>Post-approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>ISO13485 Certification, registered certification body’s Inspection report, etc</td>
<td>Mfg. sites</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>2</td>
<td>Manufacturing process flow</td>
<td>Product subject to inspection</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>3</td>
<td>Outline of content of mfg. site’s activities and documents which can identify mutual relations of QMS between MAH and mfg. sites.</td>
<td>Mfg. sites</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>4</td>
<td>Outline of mfg. site</td>
<td>Mfg. sites</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>5</td>
<td>Product list for application</td>
<td>Product family</td>
<td>Required</td>
<td>Required</td>
</tr>
</tbody>
</table>

Issued on 1st April, 2015.
Overview of QMS inspection flow

- **Receive application of QMS inspection**
- **Determine on-site or desktop inspection**
- **On-site Inspection**
  - MAH *
  - Mfg. site A *(Assembly)*
- **Desktop Inspection**
  - Mfg. site B *(Design)*
  - Mfg. site C *(Distribution)*
- **Conformity assessment**
- **Issue Compliance certification and inspection report**

- **~4 week**
- **~4 month**

*: Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2.
5.2. Determination of on-site or desktop inspection

Decision of desktop or on-site

Input Information

- Submitted documents
- Reported adverse events and recalls
- Records of previous QMS inspections etc.

Risk Assessment

- Complexity of manufacturing processes
- Risk associated with the use of products
- Previous nonconformities and recalls
- Results of the previous on-site inspections
- Certificate of ISO13485 etc.

Decision of on-site or desktop

On-Site Inspection

Desktop Inspection

Issued on 1st April, 2015.
High possibility of desktop inspection

If MAH or Mfg. sites have...

(1) Latest ISO13485 certification or audit report within 3 years of issue.
   issued by certification bodies registered under the medical device regulation system of Japan, US, Europe, Australia or Canada.

(2) Latest On-site QMS inspection report within 3 years of issue by registered certification bodies in Japan

(3) QMS inspection report issued by the foreign governments under MOU, etc.
Overview of QMS inspection flow

- Receive application of QMS inspection
- Determine on-site or desktop inspection
- On-site Inspection
  - MAH *
  - Mfg. site A * (Assembly)
- Desktop Inspection
  - Mfg. site B * (Design)
  - Mfg. site C * (Distribution)
- Conformity assessment
- Issue Compliance certification and inspection report

*: Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2.

- 6 months
- Issued on 1st April, 2015.
On-site inspection flow chart

1. Notification of Inspection
   - Submit documents PMDA requests
   - ~6 weeks

2. On-site QMS Inspection
   - 3~4 days
   - ~14 days

3. Issue findings report
   - ~30 days*

4. Submit improvement Plan or Report
   - ~4 months

5. Accept improvement Plan or Report

Issued on 1st April, 2015.
Overseas on-site inspection

- 2 inspectors / inspection in general
- Accompanied by interpreters
- Duration: 2 to 4 days
- Notification: ~ 6 weeks before the inspection
- Scope: Product Family
  (Not only application product, but also products in same product family are subject to QMS Inspection.)
- Request for documents prior to the inspection
# Example of QMS Inspection Schedule

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Item</th>
</tr>
</thead>
</table>
| Day 1  | 9:00~12:00    | 1. Opening meeting  
(1) Introduction of Inspection  
(2) Overview of Company and Facility*  
(3) Overview of Products*  
(4) Changes (QMS) from the last Inspection*  
2. Management  
(1) QMS organization (including Agreement made with MAH  
(2) Quality Manual  
(3) Quality Policy and Objectives  
(4) Management Review  
3. Documentation and Records  
13:00~17:00  
4. Plant tour
|        |               | 5. Product and Process controls  
6. Product documentation (Seihin Hyojun Syo) |
|        | 13:00~17:00   | 7. Design and Development (including Risk Management)                  |
| Day 2  | 9:00~12:00    | 8. Purchasing Control  
9. Customer related processes |
|        | 13:00~17:00   | 10. Corrective and Preventive Actions  
11. Teem Meeting of Inspectors  
12. Confirmation on Findings  
13. Closing Meeting |

As to items with*, Please give presentations to Inspectors.
Note that this schedule may slightly change due to progress.

Issued on 1st April, 2015.
### Request for Submitted Documents for On-site Inspection (ex)

- Quality Manual
- List of QMS documents
- Quality control process chart
- CAPA log

*in English or Japanese*

Issued on 1st April, 2015.
Overview of QMS inspection flow

- Receive application of QMS inspection
- Determine on-site or desktop inspection

- On-site Inspection
  - MAH *
  - Mfg. site A * (Assembly)

- Desktop Inspection
  - Mfg. site B * (Design)
  - Mfg. site C * (Distribution)

- Conformity assessment
- Issue Compliance certification and inspection report

*: Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2.

Issued on 1st April, 2015.

6 months
# Documents for QMS desktop review

<table>
<thead>
<tr>
<th>Documents about subject of QMS Inspection mfg. site</th>
<th>Outline of Documents</th>
<th>Subject</th>
<th>Pre-/Pre-partial</th>
<th>Post-approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Layout of all mfg. site building</td>
<td>• Aerial photograph or location map of mfg. site</td>
<td>Mfg. sites (expect for Design facility)</td>
<td>required</td>
<td>required</td>
</tr>
</tbody>
</table>
| Floor plan                                        | • Clean room grade  
  • Differential pressure  
  • List or layout of representative manufacturing and inspection equipments | Mfg. sites (expect for Design facility) | required | required |
| Organization chart                                | • Responsible persons and departments related to QMS | Mfg. sites | required | Required |

<table>
<thead>
<tr>
<th>Documents about QMS</th>
<th>Outline of Documents</th>
<th>Subject</th>
<th>Pre-/Pre-partial</th>
<th>Post-approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality management system</td>
<td>• Quality Manual</td>
<td>Mfg. sites</td>
<td>required</td>
<td>required</td>
</tr>
<tr>
<td>List of documents identified with QMS</td>
<td>• Including name, number, and retention period of QMS control documents</td>
<td>Mfg. sites</td>
<td>required</td>
<td>Required</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Documents about product subject to the Inspection</th>
<th>Outline of Documents</th>
<th>Subject</th>
<th>Pre-/Pre-partial</th>
<th>Post-approval</th>
</tr>
</thead>
</table>
| Seihin Hyojun Sho                                 | • Seihin Hyojun Syo is document which showed the location of documents required by QMS. ([Device master record OK](#))  
  • Reference: Aug27, 2014 PFSB/CND No.0827-2 | Product subject to Inspection | required | required |
| Validation status of mfg. process                 | • List showing mfg process, mfg. site, and date about the validation. | Product subject to Inspection | required | required |

---

Issued on 1st April, 2015.
Cases from desktop to on-site inspection

We may change desktop inspection to on-site inspection in the following cases as needed.

- If there is no response or the response is not satisfactory
- The documents are not in order, and haven't improved
Overview of QMS inspection flow

1. Receive application of QMS inspection
2. Determine on-site or desktop inspection
3. On-site Inspection
   - MAH *
   - Mfg. site A * (Assembly)
4. Desktop Inspection
   - Mfg. site B * (Design)
   - Mfg. site C * (Distribution)
5. Conformity assessment
6. Issue Compliance certification and inspection report

*: Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2. 6 months

Issued on 1st April, 2015.
Grading of Nonconformities

Figure 1: Grading overview

- Nonconformity
  - Step 1: Grading matrix
  - Step 2: Escalation Rules

Nonconformity Grade


Figure 2: Grading matrix

<table>
<thead>
<tr>
<th>Direct QMS Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article 25 to 65, 69, 72, 73, 75, 76, 80, 81, 84</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Indirect QMS Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article 5 to 24, 66 to 68, 70, 71, 72-2, 74, 77 to 79</td>
</tr>
</tbody>
</table>

First Occurrence

- Direct: 3
- Indirect: 1

Repeat Occurrence

- Direct: 4
- Indirect: 2

Issued on 1st April, 2015.
QMS compliance evaluation (1/2)

Only Grade 1

- Inspection
  - Findings Report
    - ~about 30 days
  - Improvement Report/Plan
    - ~14 days
  - Audit Report
    - Fixed date
  - Confirmation of the effectiveness
    - Next Inspection

Evaluation: Conformity

Grade 2, 3

- Inspection
  - Findings Report
    - ~about 30 days
  - Improvement Report/Plan
    - ~14 days
  - Audit Report
    - Fixed date
  - Confirmation of the effectiveness
    - Next Inspection

Evaluation: Conformity or Nonconformity

5.5. Conformity assessment

Issued on 1st April, 2015.
QMS compliance evaluation (2/2)

More than Grade 4

1. Inspection
2. Findings Report
3. Audit Report
4. Improvement Report
5. Confirmation of the effectiveness
6. Next Inspection

Evaluation: Nonconformity

Improvement < 15 Evaluation: Conformity
Reporting Date > 15 Evaluation: Nonconformity

Issued on 1st April, 2015.
Final assessment

If all sites are conformity…
- Mfg. site A (Design Facility)
- Mfg. site B (Assembling plant)
- Mfg. site C (Distribution center)

Conformity for application

If mfg. site B is nonconformity…
- Mfg. site A (Design Facility)
- Mfg. site B (Assembling plant; *crossed out*)
- Mfg. site C (Distribution center)

MAH is nonconformity, too.
(Reference: QMS ordinance article 65)

Nonconformity for application

Issued on 1st April, 2015.
Overview of QMS inspection flow

- Receive application of QMS inspection

- Determine on-site or desktop inspection

- On-site Inspection
  - MAH *
  - Mfg. site A * (Assembly)

- Desktop Inspection
  - Mfg. site B * (Design)
  - Mfg. site C * (Distribution)

- Conformity assessment

- Issue Compliance certification and inspection report

* Example. PMDA determines whether on-site or desktop inspection based on risk assessment. See 5.2.

Issued on 1st April, 2015.
QMS Compliance Certification

Marketing Authorization Holder

- Manufacturing Site (Design Facility)
- Assembling Plant
- Manufacturing Site (Assembling Plant)
- Manufacturing Site (Contract Sterilizer)
- Manufacturing Site (Domestic Distribution Center)

On-site Inspection

*Send to MAH, in a general.

Desktop Inspection

Inspection Report

Summary Report

QMS Compliance Certification

Issued on 1st April, 2015.
Summary Report

Reporting Date:

QMS summary report
[Inspecting organization]
Lead inspector:
Inspector:

1. Reference No.

2. General Information
   (1) Name of the MAH
   (2) Address of the MAH
   (3) Products under the inspection
   (4) Purpose of the inspection

3. Summary of result of each mfg. sites
   (1) Name of the mfg. site
   (2) Address of the mfg. site
   (3) Registration number and date
   (4) Sub-systems under the inspection
   (5) Inspecting date
   (6) On-site or desktop
   (7) Reference no. of QMS inspection report
   (8) Result of the inspection

4. Total result

5. Recital

Issued on 1st April, 2015.
References

[1] MHLW Compliance and Narcotics Division on September 11, 2014 as notification No. 5

[2] MHLW on August 6, 2014 as Notice 317

QMS regulation-related sites

PMDA / QMS (English)
http://www.pmda.go.jp/english/review-services/gmp-qms-gctp/0002.html

PMDA / Notifications related to PAL Revision (Japanese)
http://www.pmda.go.jp/review-services/drug-reviews/about-reviews/devices/8077.html

MHLW (English)

Issued on 1st April, 2015.