Japan
QMS system and collaboration with ANVISA/Brazil

Pharmaceuticals and Medical Devices Agency
（PMDA）

Naoko SATO

Japanese Government

- Cabinet Office

  - National Public Safety Commission

  (National Police Agency)
- Ministry of Internal Affairs and Communications*
- Ministry of Justice
- Ministry of Foreign Affairs
- Ministry of Finance
- Ministry of Defense
- Reconstruction Agency
- Ministry of Education, Culture, Sports, Science and Technology(MEXT)*
- **Ministry of Health, Labour and Welfare (MHLW)***
- Ministry of Agriculture, Forestry and Fisheries*
- Ministry of Economy, Trade and Industry(METI)*
- Ministry of Land, Infrastructure, Transport and Tourism*
- Ministry of the Environment

* merged some ministries and agencies in 2001

Role of MHLW and PMDA

MHLW

Ultimate Responsibilities in policies & administrative measures

ex. Final judgment on approval

Product withdrawal from market

PMDA

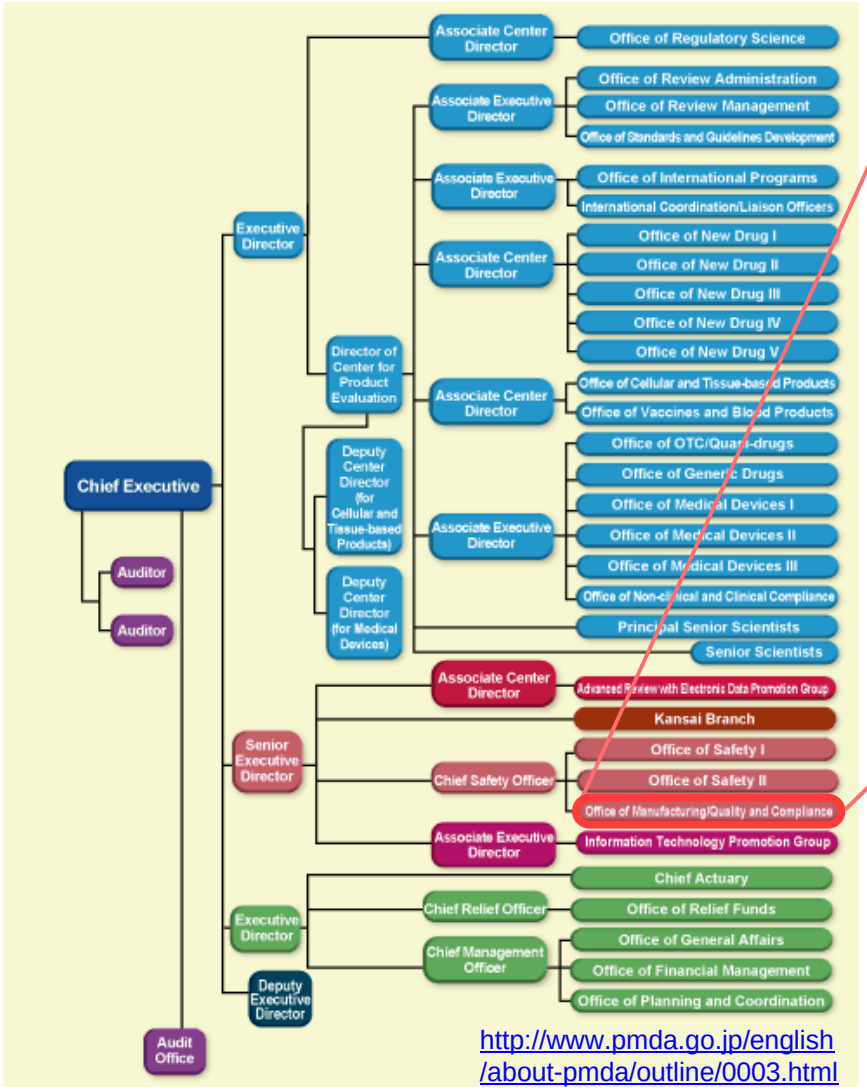
Actual review, examination, data analysis, etc. to assist MHLW's measures

ex. Approval Review of MDs

QMS/GLP/GCP inspection

Collection and analysis of Adverse Event Reports

Manufacturing/Quality and Compliance



http://www.pmda.go.jp/english/about-pmda/outline/0003.html

Manufacturing/Quality and Compliance

- QA of GMP/QMS
- GMP
- QMS
- RCB supervision

License, Registration, Approval

Marketing license

Company

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

Manufacturing site registration (*"Toroku"*)

Plant

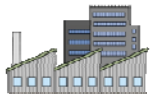
– Required for conducting specified manufacturing processes.
As for medical devices, design, main assembling, sterilization and domestic (Japan) distribution site shall be registered.

Marketing approval *("Shonin")*

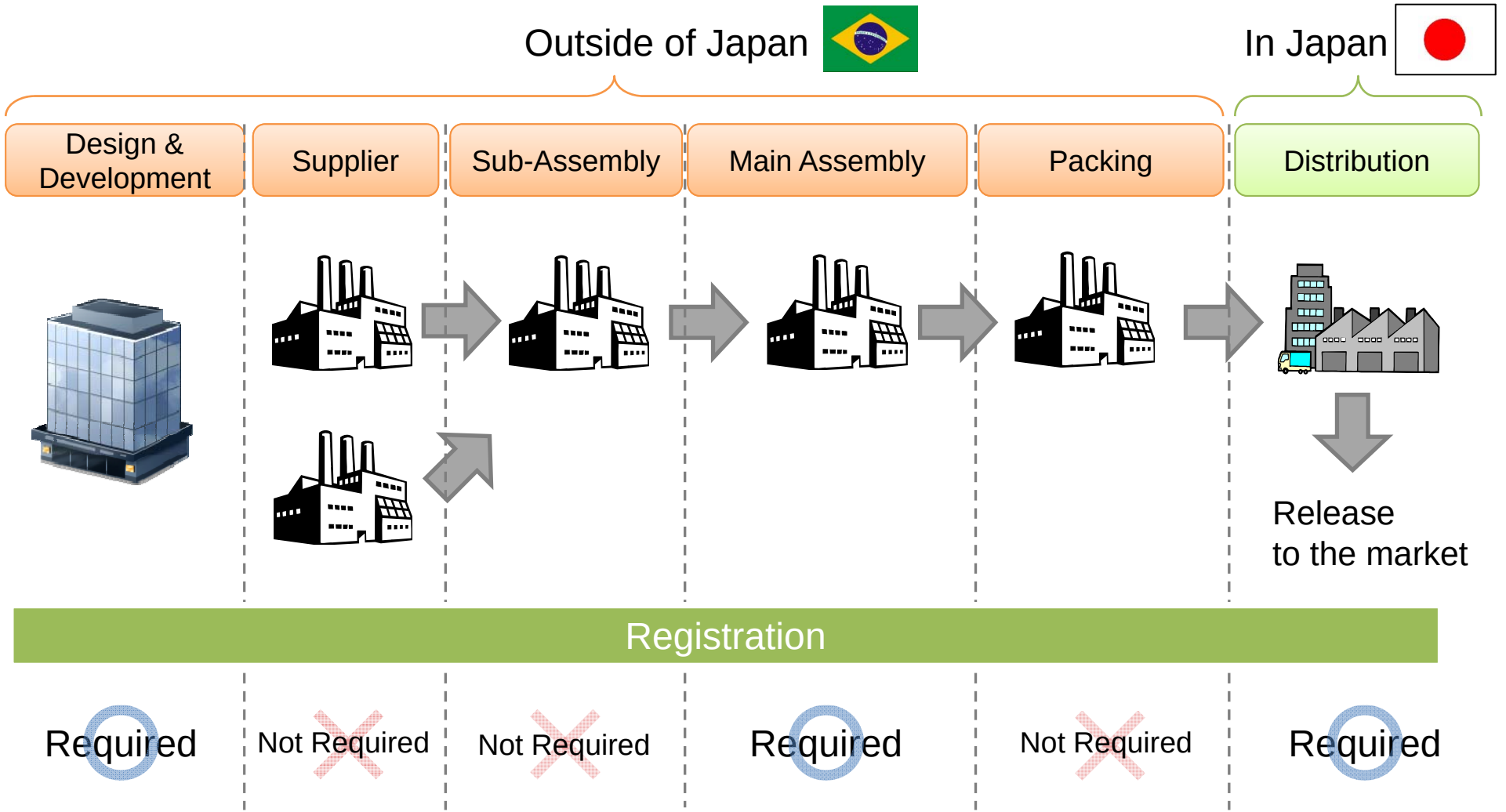
Product

– Required for any medical devices and IVDs releasing to the market 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.

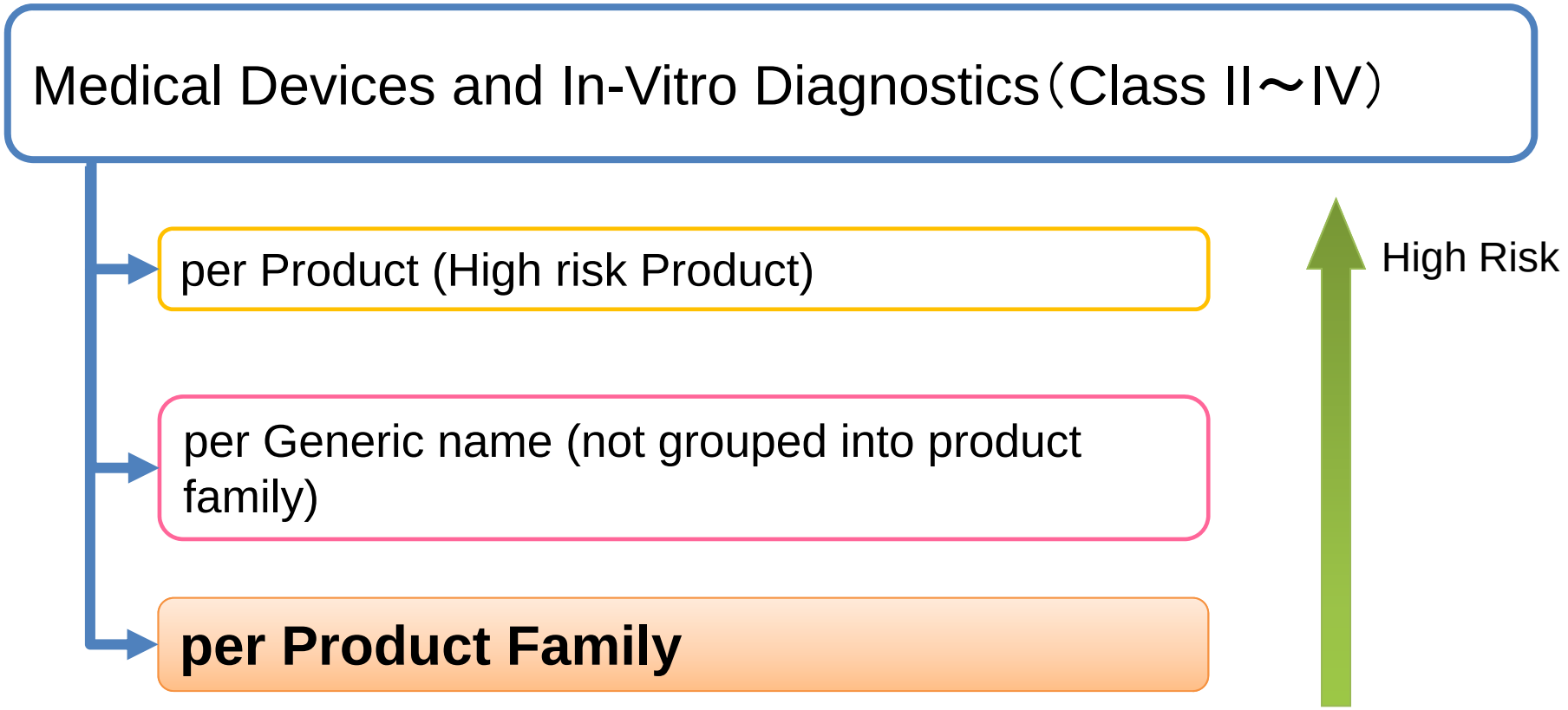
Scope of Registration and Inspection

	Registration	QMS Inspection
 MAH Marketing Authorization Holder	N/A The license of marketing is required	Required
 Design Facility	Required	Required
 Main Assembling Plant	Required	Required
 Sterilizer	Required only for sterile medical device	Required only for sterile medical device
 Domestic (Japan) Distribution Center	Required	Required
 Other sites	Not Required	Depends PMDA determines based on risk assessment

Example of mfg. site registration



QMS Inspection is conducted per…



Product Families

Product Families: Class IV

- Class IV Product Family is established by Japanese original definition.
- Examples of product families:
  Stent
  Stent graft
  Active catheter
  Cardiac pacemaker and defibrillator
  Ventricular assist device

Product Families: Class II / III

- Class II / III Product Family refer to NBOG BPG 2009-3.
- Examples of product families:
  Non-active instruments (MD 0106)
  Non-active cardiovascular implants (MD 0201)
  Non-active dental equipment and instruments (MD 0401)
  Devices for stimulation or inhibition (MD 1103)
  Imaging devices utilizing ionizing radiation (MD 1201)

Contents of New QMS ordinance

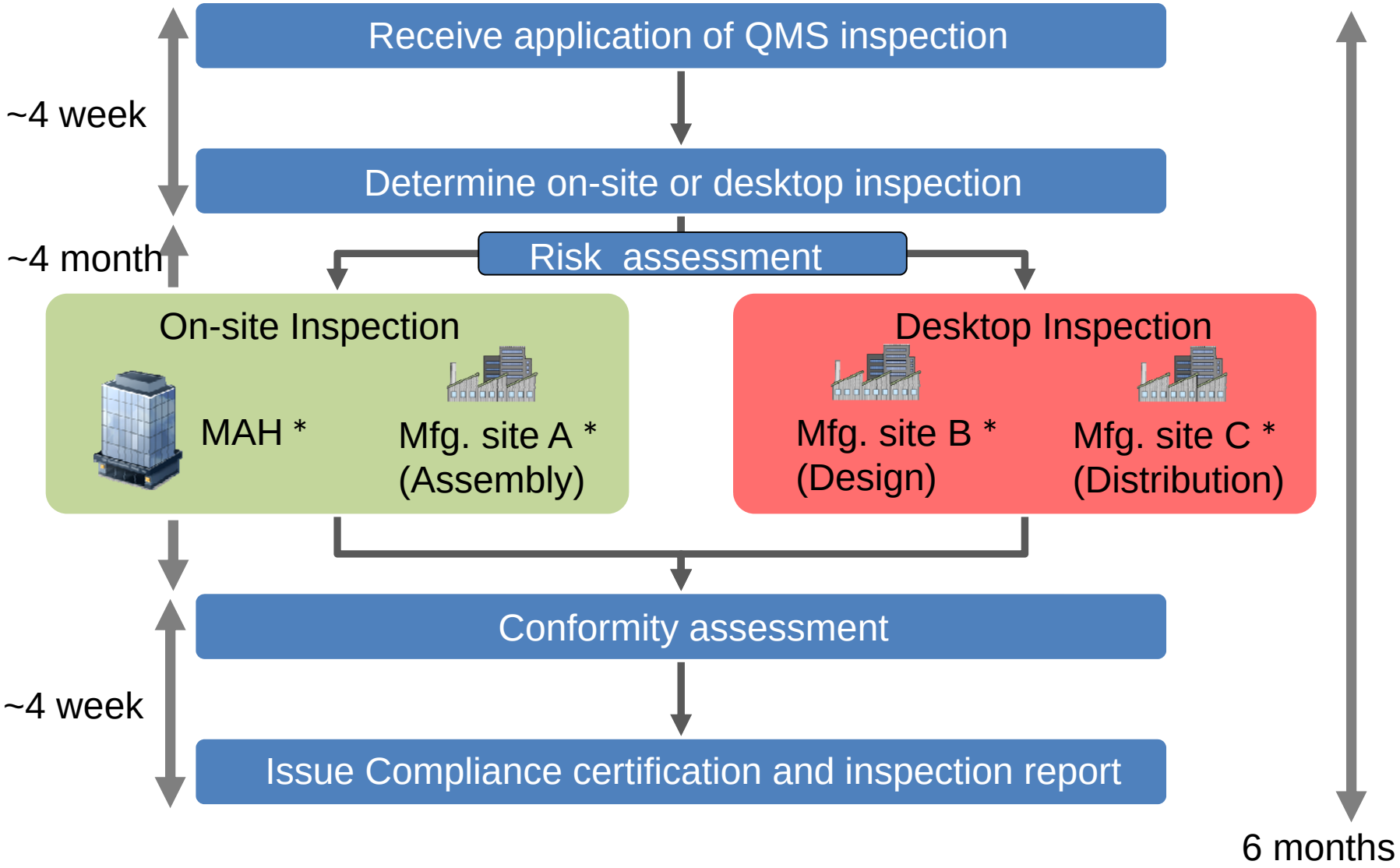
Chapter	Title	Article
1	General Provisions	1~3
2	Medical Devices Manufacturing Harmonized to ISO13485:2003	4~64
3	Additional Requirements.	65~72-3
Additional requirements according to the characteristics of the products 4	Biological-origin Medical Device, etc. Manufacturers (Domestic, Foreign)	73~79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

QMS Inspection Authority

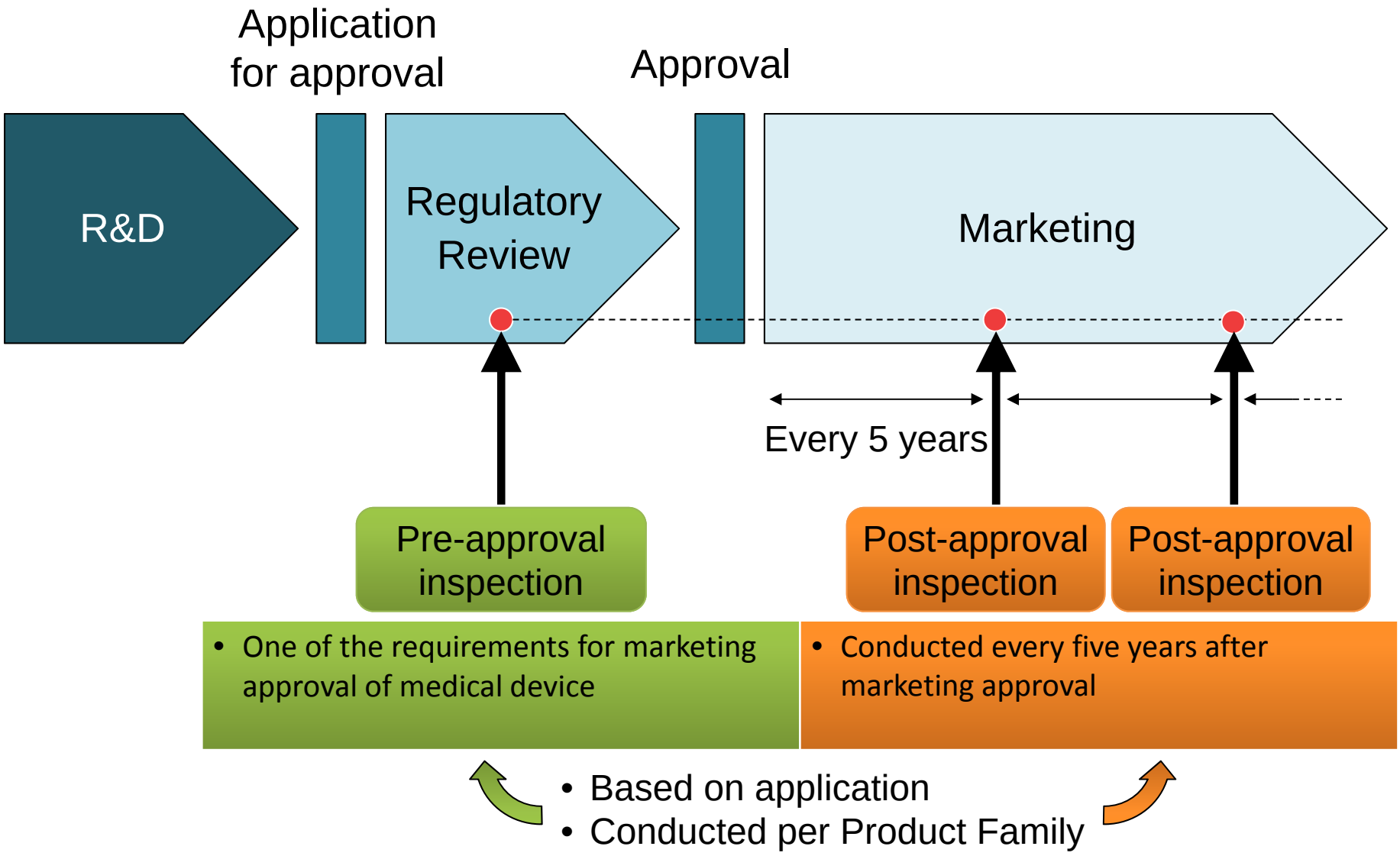
Product		Inspection Authority
Medical Devices	• Class IV • New medical devices • Cell / Tissue-based medical devices	PMDA
	• Class III and Class II (without CS*)	PMDA
	• Class III and Class II (with CS*)	Registered certification body
IVDs	• New drugs • Radioactive drugs	PMDA
	• Products without CS*	PMDA
	• Products with CS*	Registered certification body

*CS : Certification Standards

Overview of QMS inspection flow



QMS Inspections



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..

ANVISA inspection in Japan

PMDA joined the following inspections as observers

- IVD (Niigata-prefecture) 2013/5/6-9(4days)
- Medical Device (Nagano-prefecture) 2014/9/16-19(4days)
- Medical Device (Ishikawa-prefecture) 2014/10/21-23(3days)

Seminar and Training with ANVISA

Seminar

- 1st Brazil-Japan Seminar 2014/8/2
- Seminario Internacional- Challenges and Trends on Health Surveillance of Products and Services (from FDA, EMA, HPRA, Japan) 2015/6/30-7/1

Training

- 2nd Medical Device Training 2015/2/2-6

-Pre-market Review/Quality Control System/ Safety measures (from Australia, Singapore, Taiwan, Brazil, USA)

Global Activities

Summit	ICH	IMDRF	PIC/S	HBD
APEC LSIF RHSC	OECD	PDG	IGDRP	

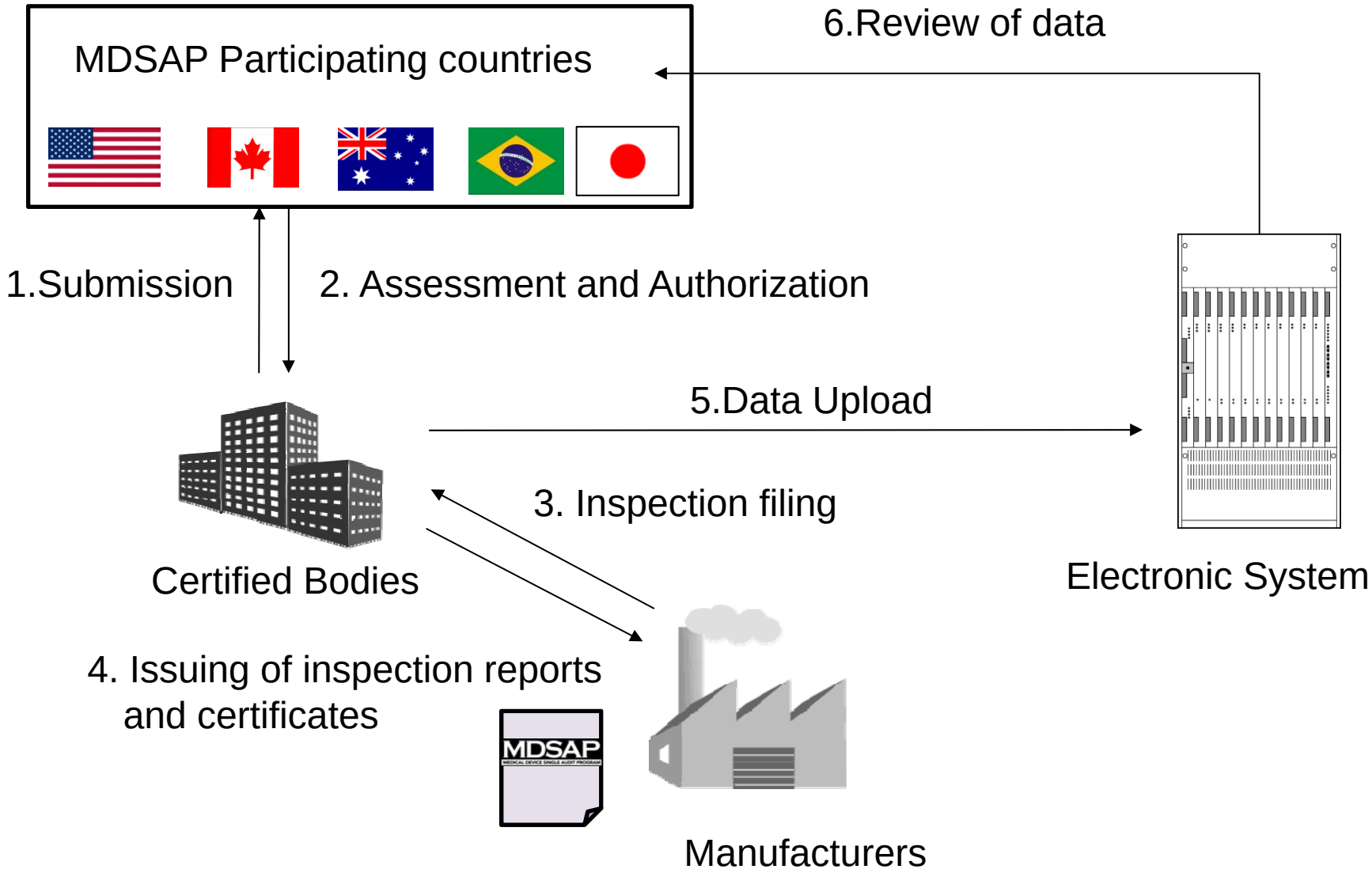
and more…

Abbreviation	Official Name
Summit	International Summit of Heads of Medicines Regulatory Agencies
ICH	International Conference on Harmonization
IMDRF	International Medical Device Regulators Forum
PIC/S	Pharmaceutical Inspection Convention and Pharmaceutical Inspection Co-operation Scheme
HBD	Harmonization By Doing
APEC LSIF RHSC	APEC Life Science Innovation Forum Regulatory Harmonization Steering Committee
OECD MAD	OECD Mutual Acceptance of Data
PDG	Pharmacopoeial Discussion Group
IGDRP	International Generic Drug Regulators Pilot

History of MDSAP Pilot

Date	Activities
2012. Nov.	US, Australia, Canada, and Brazil Signed for Corporation Agreement for MDSAP Pilot
2013. Fall	Japan joined in MDSAP Pilot as an official observer.
2013. Oct.	Publication of the outline of MDSAP Pilot
2014. Jan.	Start of assessment for Auditing Organizations
2015. Jan.	Announcement to Medical Device manufacturers to encourage joining in MDSAP Pilot.
2015. Mar.	EU joined as an official observer.
2015. June	Japan Announcement of joining in MDSAP Pilot as a participating country.

Basic flow of MDSAP



Requirements for MDSAP Pilot

QMS requirements

- ISO13485:2003
- Brazilian GMPs (RDC ANVISA)
- Quality System Regulation (21 CFR Part 820)
- QMS Ordinance

Local requirements in the participating countries

Adverse event reporting, facility registration etc.

References

MHLW (English)

http://www.mhlw.go.jp/english/index.html

PMDA (English)

http://www.pmda.go.jp/english/index.html

PMDA / QMS Inspections (English)

http://www.pmda.go.jp/english/review-services/gmp-qms-gctp/0003.html#r=s&r=s

PMDA / Guidance on QMS (English)

http://www.pmda.go.jp/english/review-services/gmp-qms-gctp/0002.html

Any question about my presentation

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Obrigado pela sua atenção!

Thank you for your attention!