PSEHB/PSD Notification No.0217-1
February 17, 2023

To: Commissioners of Prefectural Health Departments (Bureaus):

Director of Pharmaceutical Safety Division,
Pharmaceutical Safety and Environmental Health Bureau,
Ministry of Health, Labour and Welfare
(Official seal omitted)

Points to Consider for Describing the Results of Studies Using Medical Information Database in Electronic Package Inserts

The subject matter in the title has been notified through the “Amendment of Instructions for Electronic Package Inserts Regarding the Results of Investigation Using Medical Information Database” (PSEHB Notification No.0217-1 by the Director-General of the Pharmaceutical Safety and Environmental Health Bureau, Ministry of Health, Labour and Welfare (hereinafter referred to as “MHLW”) dated February 17, 2023). The notifications related to the instructions for electronic package inserts (hereinafter referred to as “e-PIs”) were reviewed and points to consider for implementation of the instructions were described as below. Therefore, please understand these points to consider and make them thoroughly known to all the relevant organizations under your jurisdiction.

Please note that a copy of this notification will be issued to each relevant organization specified in the appended list.

1. Partial amendment of the notifications related to instructions for electronic package inserts

(1) The appendix[1)] of "Points to Consider for the Instructions for Package Inserts of Prescription Drugs, etc." (PSEHB/SD Notification No. 0608-1 by the Director of Safety Division, Pharmaceutical Safety and Environmental Health Bureau, MHLW, dated June 8, 2017) has been partially amended as shown in the following old/new comparative table.

Revised language is underlined.

New	Old
I (Omitted)	I (Omitted)
II Points to Consider for Each Section	II Points to Consider for Each Section
A. to G. (Omitted)	A. to G. (Omitted)
1. to 16. (Omitted)	1. to 16. (Omitted)
17. CLINICAL STUDIES	17. CLINICAL STUDIES
(1) (Omitted)	(1) (Omitted)
(2) “17.2 Post-marketing Surveillance, etc.” The results of studies appropriately planned and implemented using a medical information database shall be described with clearly specified source of the quotation.	(Newly established)
(3) (Omitted)	(2) (Omitted)
18. to 26. (Omitted)	18. to 26. (Omitted)

(2) The appendix[2)] of "Instructions for Package Inserts of Regenerative Medical Products (Detailed Rules)" (PFSB/SD Notification No.1002-13 by the Director of Safety Division, Pharmaceutical and Food Safety Bureau, MHLW, dated October 2, 2014) has been partially amended as shown in the following old/new comparative table.

1) The full text of the PSEHB/HD Notification No.0608-1 after the partial revision has been omitted from this English translation.

2) The full text of the PFSB/SD Notification No.1002-13 after the partial revision has been omitted from this English translation.

Revised language is underlined.

New	Old
1. (Omitted)	1. (Omitted)
2. Points to consider for each description item	2. Points to consider for each description item
(1) to (10) (Omitted)	(1) to (10) (Omitted)
(11) “CLINICAL STUDIES"	(11) “CLINICAL STUDIES"
1) (Omitted)	1) (Omitted)
2) The status of use, period, number of subjects, efficacy rate, etc. from the results of clinical studies that were conducted accurately and objectively shall be described in line with the approved method of use. <u>The results of studies appropriately planned and implemented using a medical information database shall be described with clearly specified source of the quotation.</u>	2) The status of use, period, number of subjects, efficacy rate, etc. from the results of clinical studies that were conducted accurately and objectively shall be described in line with the approved method of use.
3), 4) (Omitted)	3), 4) (Omitted)
(12) to (18) (Omitted)	(12) to (18) (Omitted)

2. Points to consider for description in electronic package inserts

(1) Validity, etc. of a DB study plan

With respect to studies using a medical information database (hereinafter referred to as "DB studies") to be described in e-PIs, consultation with the Pharmaceuticals and Medical Devices Agency (hereinafter referred to as "PMDA") on the DB study plan shall be sought through a “consultation on other safety measure plans,” etc. to obtain agreement with the PMDA prior to the initiation of the study in principle. If a DB study is conducted without prior agreement with the PMDA, the person himself/herself who conducts the DB study shall be responsible for confirming the validity of the study plan and the reliability of the relevant DB, etc. and shall publish details of the results of confirmation and the validity of the study plan in a peer-reviewed academic journal.

In general, the DB study shall be a study that involves comparison with a control group, but it is acceptable to conduct a single group study for rare diseases.

(2) Ensuring the reliability of medical information database

Of DB studies that are to be described in e-PIs, those which are related to reexamination or reevaluation shall be conducted in accordance with Ministerial Ordinance on Good Post-marketing Study Practice for Drugs (MHLW Ordinance No. 171 of 2004) or Ministerial Ordinance on Good Post-marketing Study Practice for Regenerative Medical Products (MHLW Ordinance No. 90 of 2014; hereinafter collectively referred to as “GPSP Ordinance”), and GPSP compliance assessment shall be conducted not when the e-PIs are revised but when reexamination or reevaluation is applied for. Since other DB studies are not subject to GPSP compliance assessment, the person who conducts the DB study must guarantee the reliability of the study by himself/herself. However, in cases where the medical information database has been used in a post-marketing database study pursuant to the GPSP Ordinance in the past, that fact or the status of the reliability guaranteed by the company on its own may be inquired in the process of the revision of e-PIs as necessary.

Appended list

President of the Federation of Pharmaceutical Manufacturers' Associations of Japan
President of Japan Pharmaceutical Manufacturers Association
Chair of the Japan Based Technical Committee of the European Federation of Pharmaceutical Industries and Associations, Japan
Chairman of the Japan-Based Executive Committee of the Pharmaceutical Research and Manufacturers of America
Chairman of Japan Chemical Industry Association
Chairman of the Japan Chemical Exporters and Importers Association
President of Japan Kampo Federation
Chairman of the Japan Federation of Medical Devices Associations
Chairperson of the American Medical Devices and Diagnostics Manufacturers' Association
Chair of the EBC Medical Equipment and Diagnostics Committee
Representative Organizer, Association of Registered Certification Bodies under PMD Act
Chairperson of the Forum for Innovative Regenerative Medicine
Chairman of the Japan Chamber of Commerce and Industry