# New Approach for GMP/GCTP Compliance Inspection System

## Product category-based Inspection



### **GMP/GCTP Compliance Inspection System in Japan**

#### **Conventional system (Basic approch)**

- GMP/GCTP inspections are to be conducted for the manufacturing sites based on applications <u>from marketing authorization holders (MAHs)</u>, at the time of new approval of products, at the time of partial changes, and every 5 years after approval of the products.
- Many manufacturing sites have manufactured products of multiple MAHs, and the date of approval differs for each product. Thus, during 5 years, frequent inspections were required for one manufacturing site.



Introduce a "Product Category-based inspection" as an option

(enforced in August 2021)



#### Comparison between a Basic approach and the Optional approach

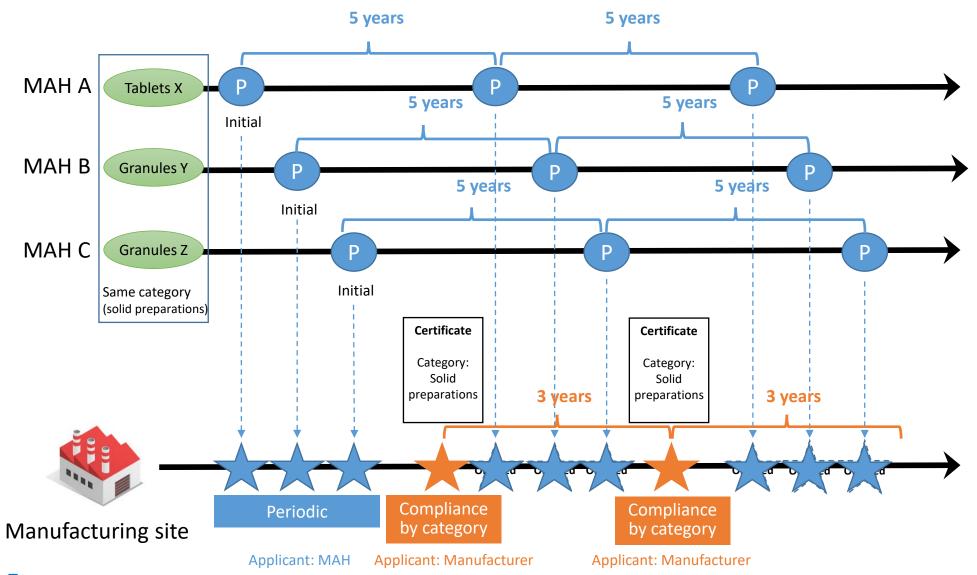
Basic approach (Periodic inspection)		Optional approach (Product category-based Inspection)
Marketing authorization holder	Applicant	Manufacturer*  *Manufacturing sites licensed/certified/registered under the provisions of Article 13, etc. of the Act Manufacturing sites of drug substance intermediates without license, etc., external testing institutions, etc. are excluded.
For each product (Applications may be made collectively for each MAH/manufacturing site.)	Application unit	For each manufacturing process category
Every 5 years after obtaining approval (Applications may be moved forward according to the timing of renewal of manufacturing license, etc.)	Timing of application	Optionally (applications should be made in a planned manner so that the Certificate, which is effective at the time of every 5 years after approval of the product for which the periodic inspection is intended to be omitted, is issued)
A legal obligation is imposed, and the failure falls under a violation of Article 14, Paragraph 7 of the Act (Cancellation of approval, order for improvement, etc.)	Action due to failure of application	Excluded from a violation of laws and regulations  (However, the periodic inspection may not be omitted, and accordingly, the failure may fall under a violation described in the left column.)
Issuance of compliance inspection result notification (no concept of expiry date)	Notification of inspection results	Issuance of the <u>Certificate</u> (expiry date: <u>3 years</u> )

#### Procedures of a Basic approach and the Optional approach

**Basic approach (Periodic inspection)** Selection of **MAH** representative products Application for inspection **PMDA Implementation** notice Accepted Submission ma Submission of data Risk assessment of data nuta Foreign Inspection On-site inspection ctu Additional collection Findings of on-site cost Te Improvement MAH report **Proposal** Notification of GMP inspection result Inspection report (copy) Result notification, inspection report (copy) **MHLW** Prefectural governments MAH: Market Authorization Holder MHLW: Ministry of Health, Labour and Welfare

**Optional approach (Product category-based Inspection)** Periodic Foreign manufacturer Delegation In-country representative Application for inspection MAH **PMDA** Provision of confirmation Accepted certificate (copy), etc. **Implementation** Risk assessment notice Representa-Submission Selection of Submission manufacture representative of data tive of data products Foreign On-site inspection Inspection Additional collection **Findings** of on-site cost Representa-Improvement Proposal tive report **Notification of GMP** Certificate Inspection result Inspection report (copy) Representative **MHLW** Prefectural government

#### **Example of omission of periodic Inspection based on the Certificate**





#### **Product Categories**

Domestic Inspection: Prefectures are in charge

Overseas Inspection: PMDA is in charge

Categories to be described in the Certificate

packaging/labeling/storage (New) Manufacturing process Manufacturing manufacturing category process related in the manufacturing ð registered

license

Manufacturing process categorized as the **sterile category** of manufacturing license

**Terminal** 

sterilization

Injections

Eye drops

Ear drops

(sterile)

**Ophthalmic** 

ointments

Dialysis agents

(peritoneal dialysis agents)

Aseptic processing
Injections
Eye drops
Ear drops (sterile)
Ophthalmic ointments
Dialysis agents (peritoneal dialysis agents)

Sterile Drug substances

Manufacturing process categorized as the **non-sterile category** of manufacturing license

→ Crude drugs

**Preparations** 

related to crude

drugs

Whole crude drugs

Cut crude drugs

Powdered crude

drugs

Pills

**Extracts** 

Solid preparations

Tablets

Inhalations (solid) Capsules

Ear drops (non-sterile; solid)

(hard)

Semi-solid preparations

Ointments

Creams

Gels

Ear drops (non-sterile; semi-solid) Capsules
(soft)
\*Depending on
the content, it
may be solid or
semi-solid.

Liquids

Oral

solutions

**Inhalations** 

(liquid)

cts)

Drug substances (so-called chemical products)

Crude drugs as Drug substances

→ Packaging, etc.



product

substance

Drug

#### **Product Categories**

PMDA is in charge



#### Drugs ← → Cellular and tissue-based products

Manufacturing process categorized as the **biological product category** of manufacturing license

[1] Specified biologica products

[2] Drugs with nationa certificate (excluding [1])

Others\*
(excluding [1] and [2])

\*Drugs listed in 1 and 5 in Article 80, Paragraph 7, Item 7 of the Order. (biological products and drugs produced by recombinant DNA technology)

Packaging/labeling/storage

Manufacturing process categorized as the radiopharmaceutical category of manufacturing license

Radiopharmaceuticals

Packaging/ labeling/ storage Manufacturing process of cellular and tissuebased products

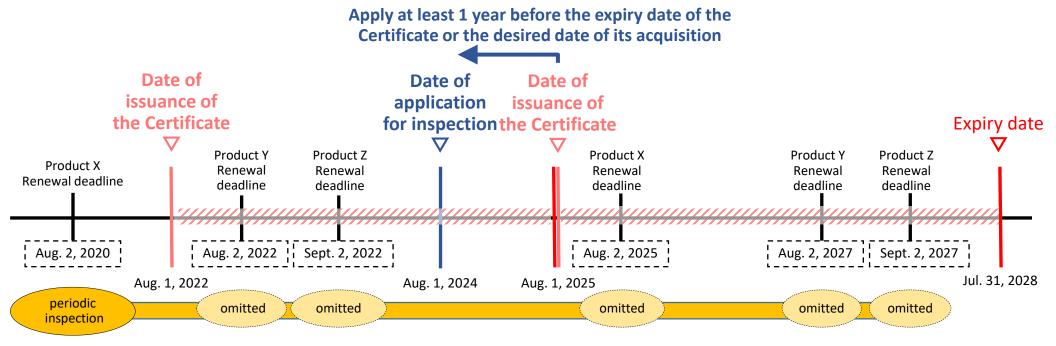
Cellular and tissue based products

Packaging/ labeling/ storage



#### Standard paperwork period, etc. for Product Category-based Inspection

- The <u>period (standard paperwork period) required for PMDA's inspection</u> related to Product Category-based Inspeciton is 1 year (6 months for new, periodic, and partial changes).
- The applicant needs to apply for the inspection to the PMDA by the day 1 year before the expiry date of the Certificate or the desired date of its acquisition.



- The application for periodic inspection may be omitted only if the Certificate effective at the renewal deadline for each product has been issued.
- If the Certificate is not issued by the renewal deadline for the product, the periodic inspection may not be omitted, and it is necessary to undergo the periodic inspection.

