2013 CPhI Japan
Briefing Session on Pharmaceutical Regulations in Japan

The Master File System and Points to Consider

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Purpose of this session

To provide foreign manufacturers
with information so that they can smoothly handle Japanese pharmaceutical regulatory procedures related to the MF system.

The points to consider in avoiding issues will be explained with examples.

Overview of this session

- The MF system in Japan: From application, registration to approval
- The current situation related to in-country caretakers
- How to successfully work with in-country caretakers
- The key issues that foreign manufacturers should recognize
- Cases of issues and points to consider

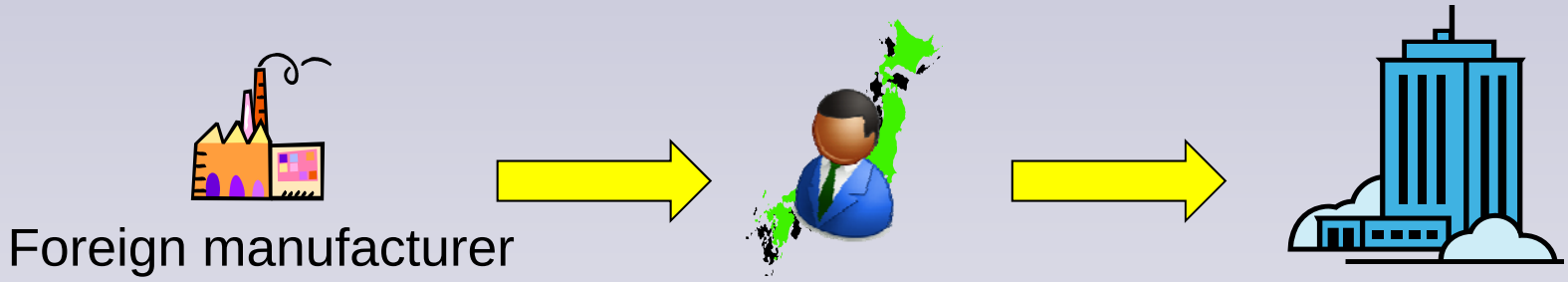
The Master File (MF) System for Drug Substances, etc.

- To protect know-how related to manufacturing methods, etc.
- Registration in the MF is optional. An MF registration certificate is not a marketing certificate.
- In a regulatory review, items registered in the MF are quoted as information necessary for the review. Some of these items will be approved items.
- Foreign manufacturers applying for MF registration must select an in-country caretaker for drug substances (APIs), etc.

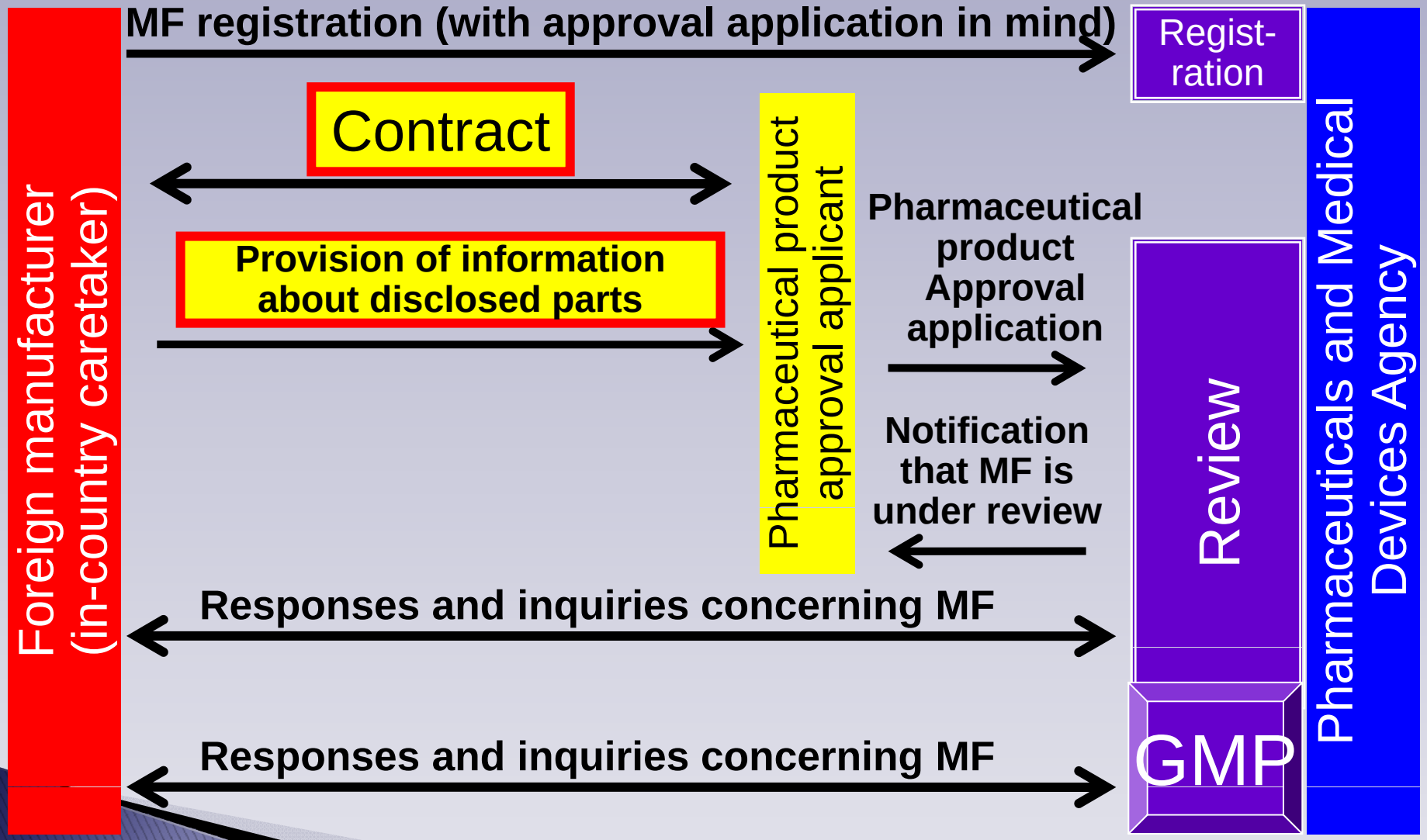
Foreign manufacturers applying for MF registration

[Section 2, Article 72 of the Enforcement Regulations for the Pharmaceutical Affairs Law]

Select an in-country caretaker for drug substances (APIs) etc., who is living in Japan and will undertake clerical work for the relevant registration, etc.



Regulatory review process beginning with MF registration

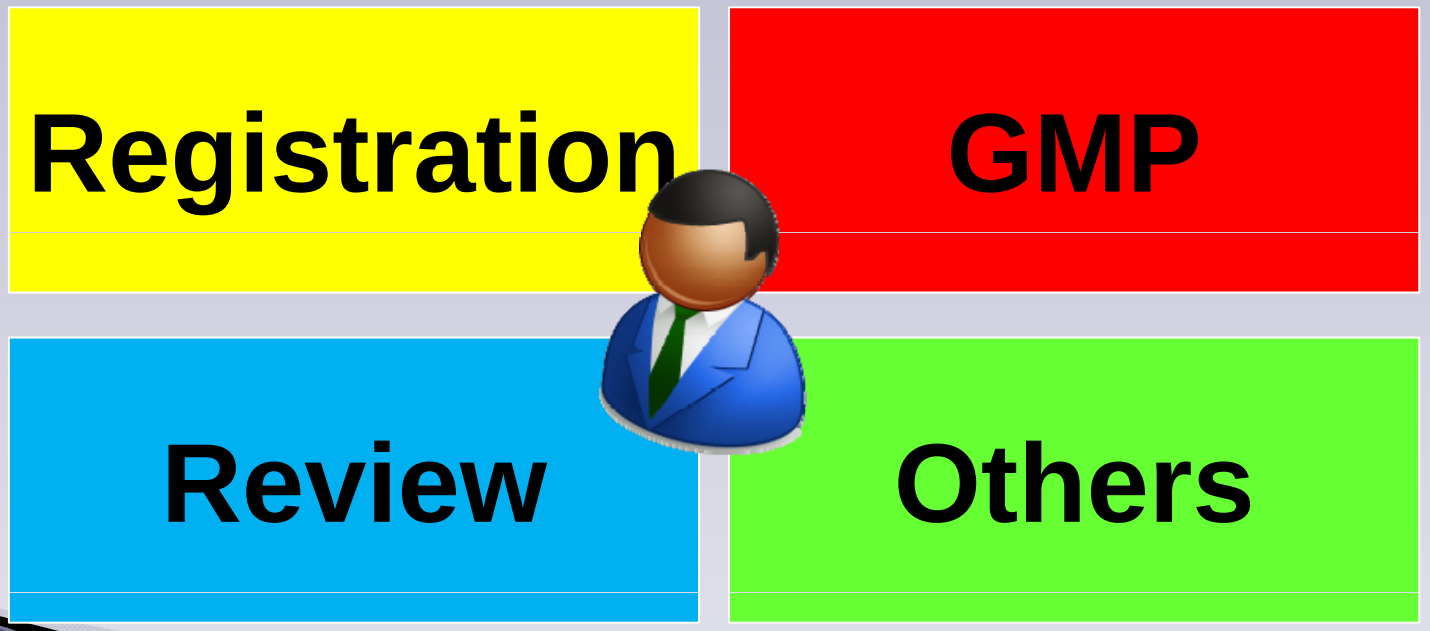


The current situation related to in-country caretakers,

Issues arising in approval reviews

Tasks required of an in-country caretaker

An in-country caretaker is required to perform tasks concerning registration, review, GMP and other procedures in corporation with a foreign manufacture.



Capabilities required of an in-country caretaker

Is your in-country caretaker selected based on only commercial relationships?

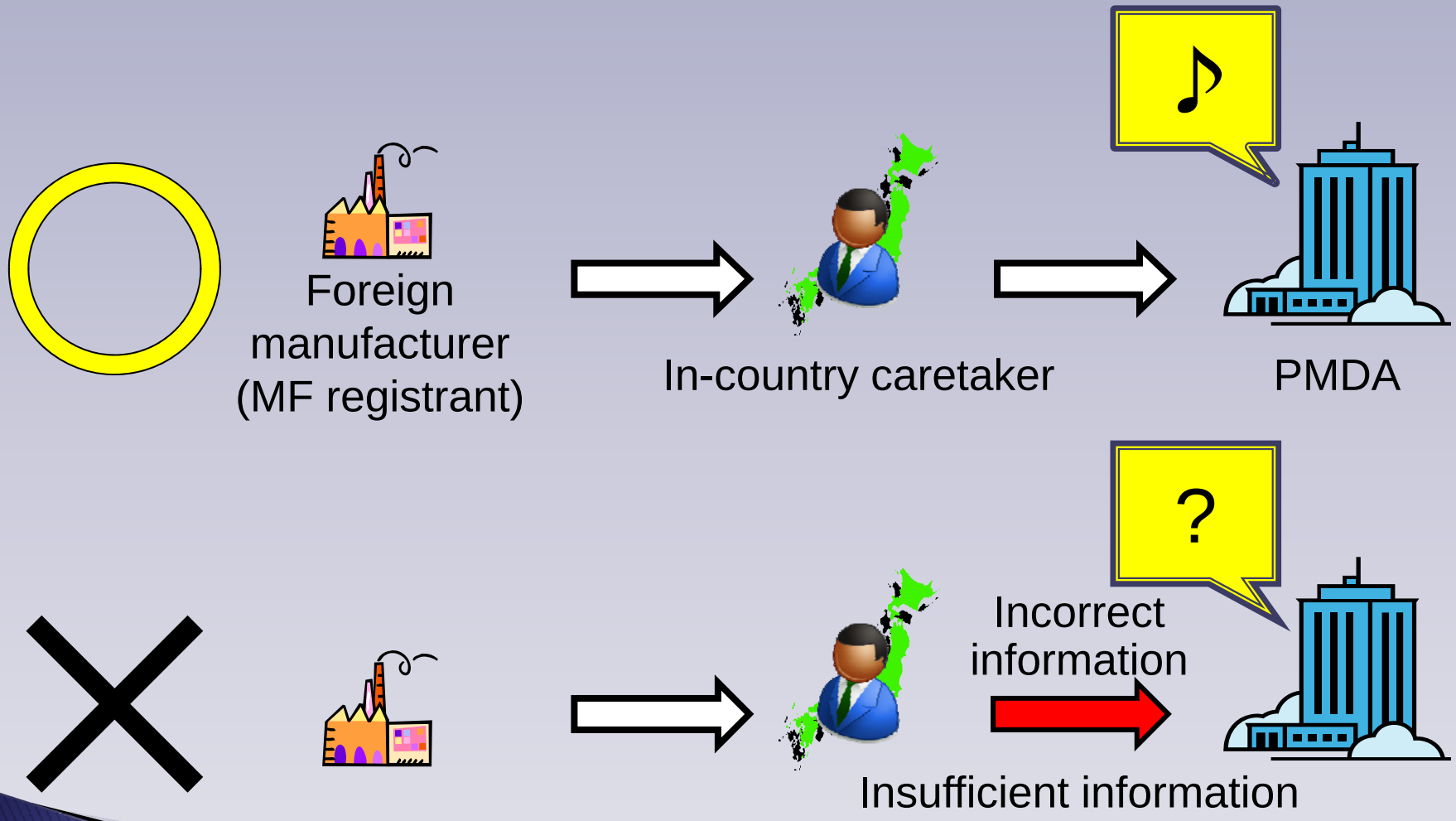
Knowledge of pharmaceutical regulations

Knowledge of biotechnological/biological drug substance manufacturing
Knowledge of chemical synthesis

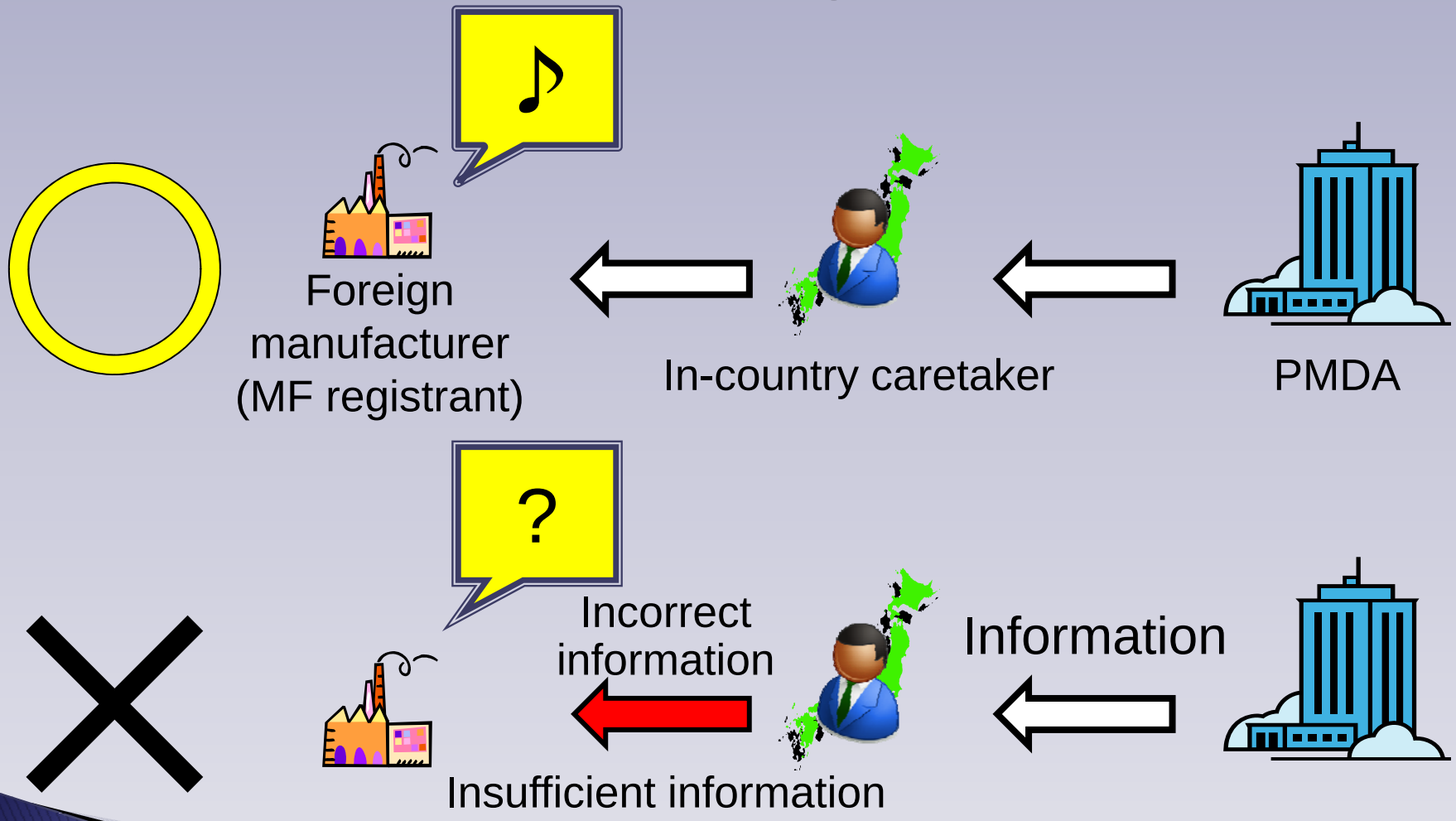
Knowledge of biolog
Knowledge of Specifications and Test Methods

Skills to translate specialized documents

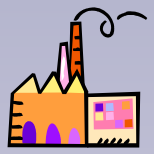
Communication from an in-country caretaker to the PMDA



Communication from an in-country caretaker to the foreign manufacturer



Reasons for lack of communication among parties concerned



Foreign manufacturer

(MF registrant)

In-country caretaker

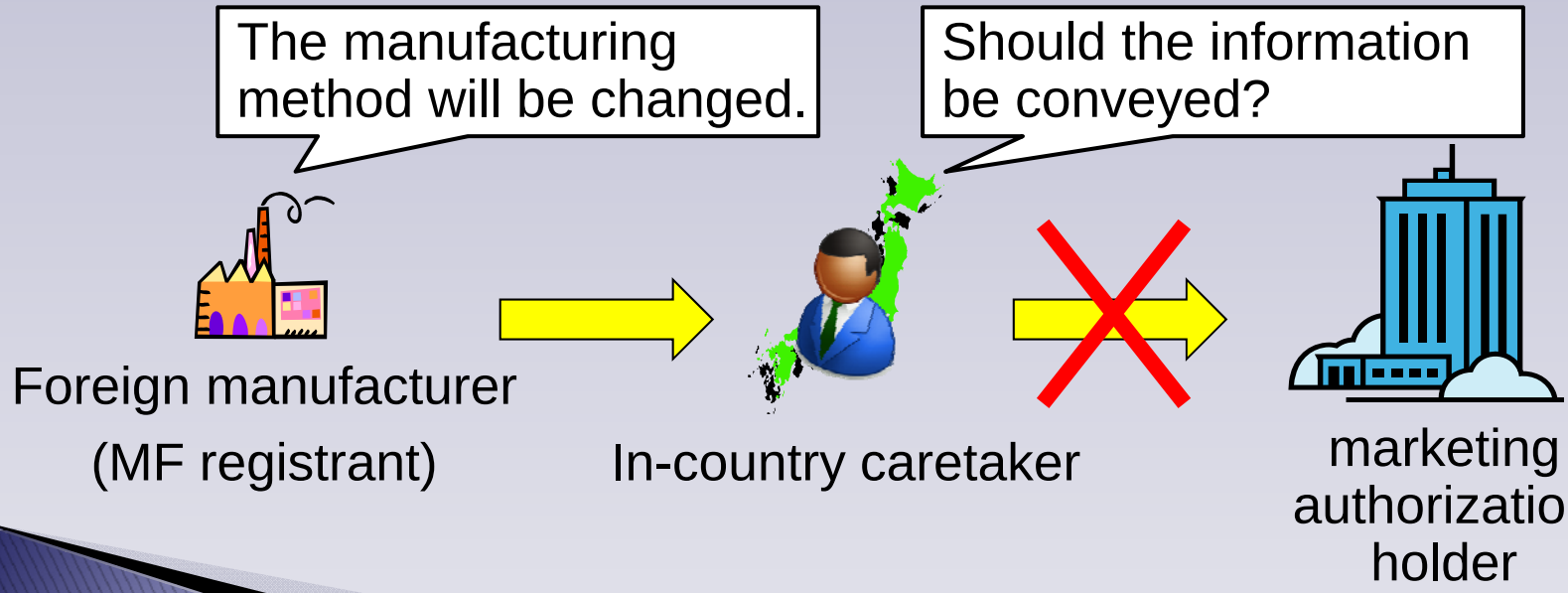
[Problems common to MF registrants and in-country caretakers]

- In general, understanding of Japanese pharmaceutical regulations is insufficient.
- Insufficient understanding of the scope of each task by both parties.

Actual cases of issues

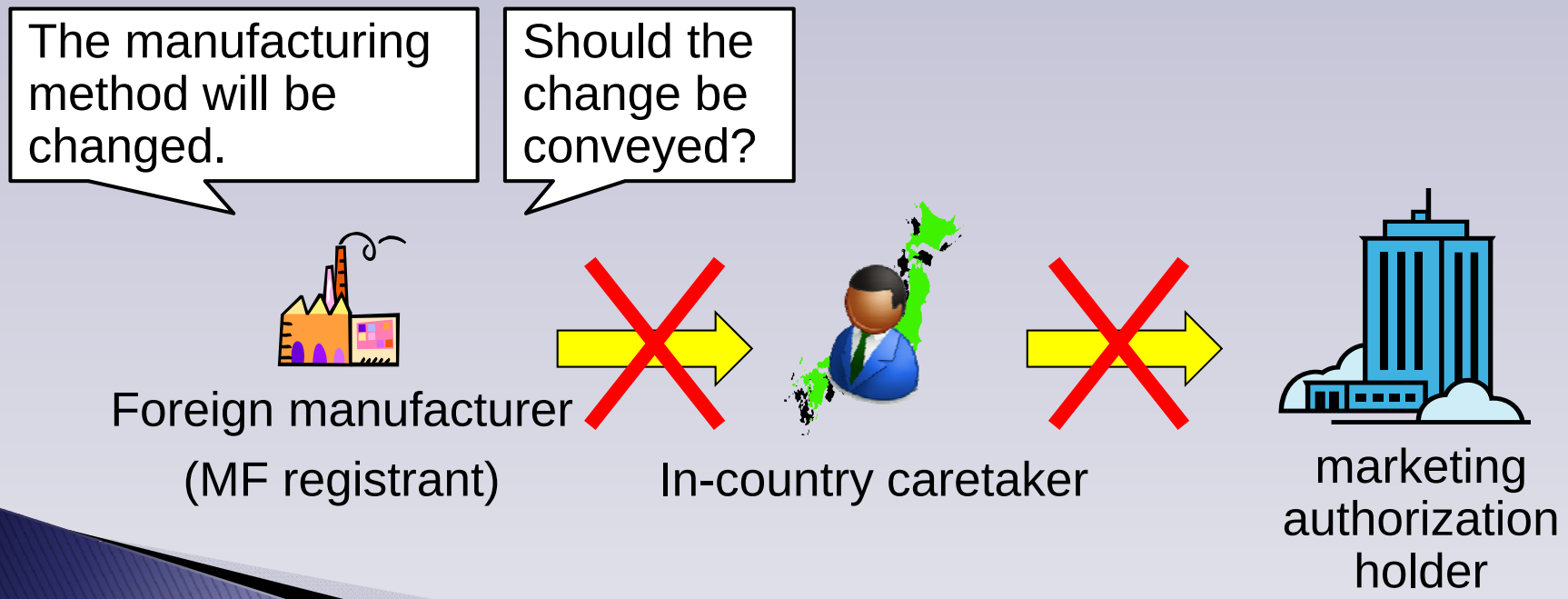
Problems in the system of communication

While the foreign manufacturer provides the in-country caretaker with appropriate information, the in-country caretaker may not provide the marketing authorization holder with appropriate information.



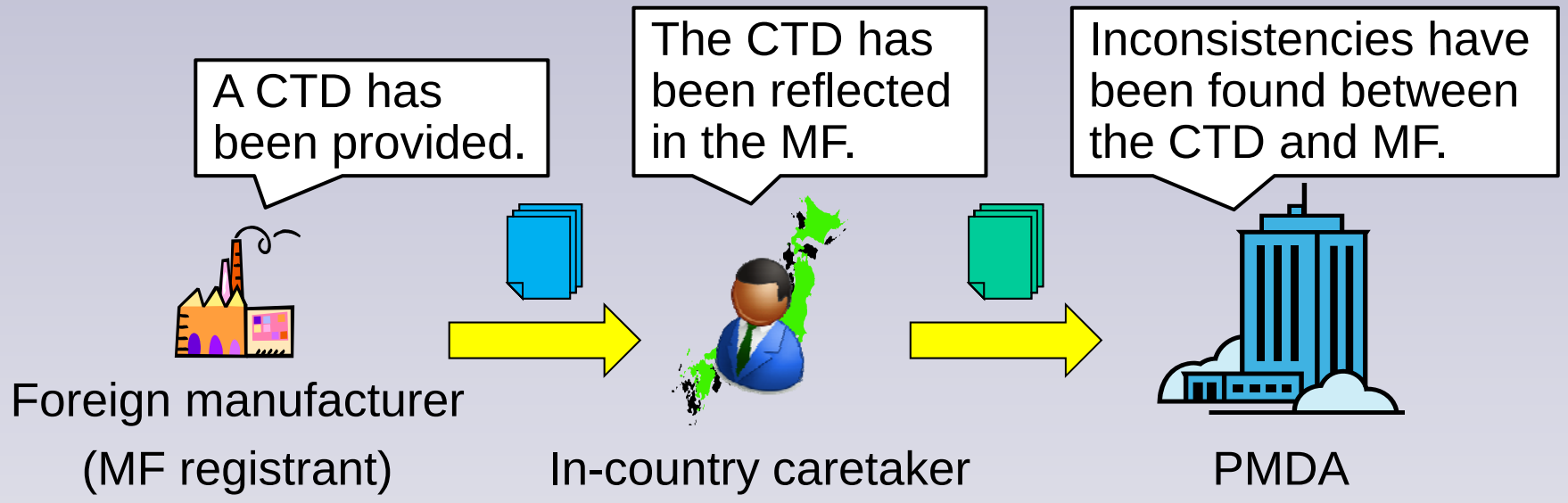
Lack of understanding of Japanese pharmaceutical regulations by foreign manufacturers

Foreign manufacturers sometimes do not provide the in-country caretaker with all the information due to lack of understanding in Japanese pharmaceutical regulations.



Not knowing that MF plays an important role in an approval application

It is not well known that items stated on the CTD should be adequately reflected in the MF. This may result in mistranslation or misunderstanding.

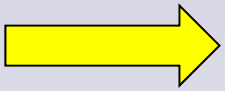


No relationship of trust between a foreign manufacturer and the in-country caretaker

Manufacturers sometimes suspect that the in-country caretaker may leak their manufacturing method know-how to third parties.

Important know-how on the manufacturing method cannot be disclosed to the in-country caretaker.

If that is the case, the documents cannot be submitted to the PMDA.

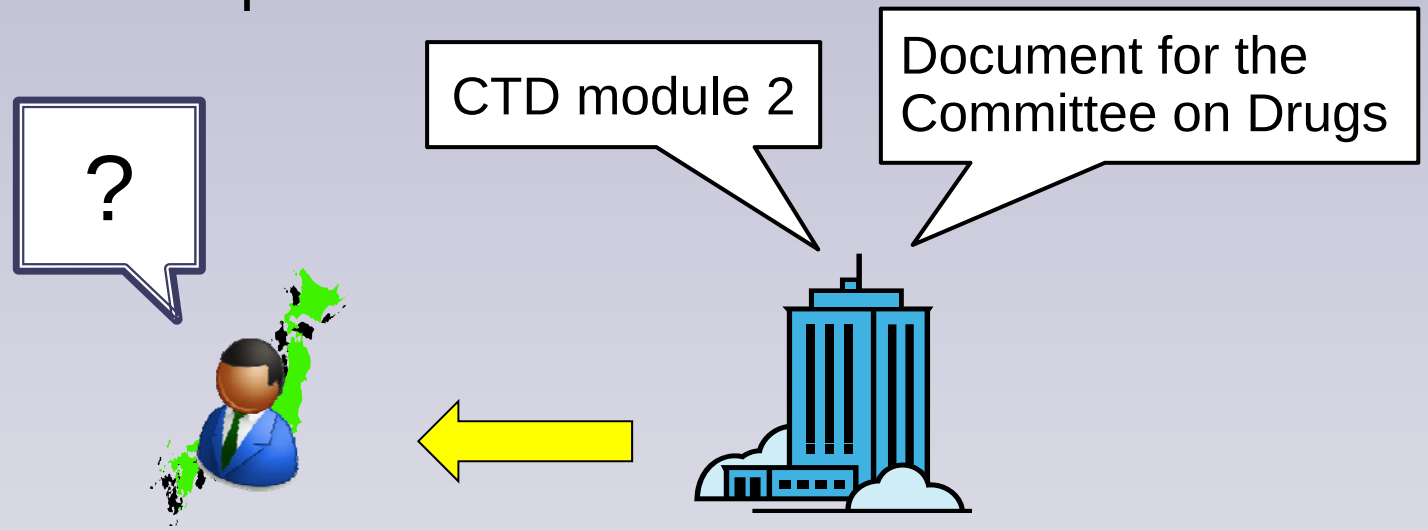


Foreign manufacturer
(MF registrant)

In-country caretaker

Lack of understanding of how to deal with the approval review process: When and what to do and what to prepare for the regulatory review

- Submission of data equivalent to CTD module 2
- Submission of data for the Committee on Drugs
- Responses to inquiries



Thank you for your attention

http://www.pmda.go.jp/operations/shonin/info/mf/mfsystem.html