

Essential Requirements of Japanese PAL

for API Business with Japan

F. Takami
Member of Legal Committee
Japan Pharmaceutical Traders' Association
April 22, 2010



Necessary Matters

- 1. Accreditation
- 2. Registration of (D)MF
- 3. GQP Agreement
- 4. GMP Compliance Inspection by PMDA



Accreditation

Persons wishing to manufacture drugs exported to Japan from overseas (overseas manufacturers) must receive accreditation from the Minister.

The specifications for accreditation are the same as those for manufacturing licenses for Japanese manufacturers. It shall be renewed every 5 years.



Registration of (D)MF

Manufacturers of APIs voluntarily register their data related to the quality and manufacturing method with the reviewing authority beforehand. In the marketing approval application review process, registered files are cited as information necessary for the review of the manufacturing method, etc.. The DMF system also aims at protecting intellectual property of relevant information.

(not applicable to OTC but only to ethical use)



GQP Agreement

Must be concluded concerning quality management between MAH and manufacturers. This is one of license requirements of MAH.

GQP Agreement, for example, makes MAH audit possible.

Ministerial Ordinance 136



GMP Compliance Inspection by PMDA

Must be received.

GMP Compliance Inspection concerning
Pharmaceuticals of Foreign Manufacturers is an inspection on the compliance of manufacturing control and quality control methods at the relevant manufacturing sites with Japanese GMP. The GMP compliance is a requirement for marketing approval.



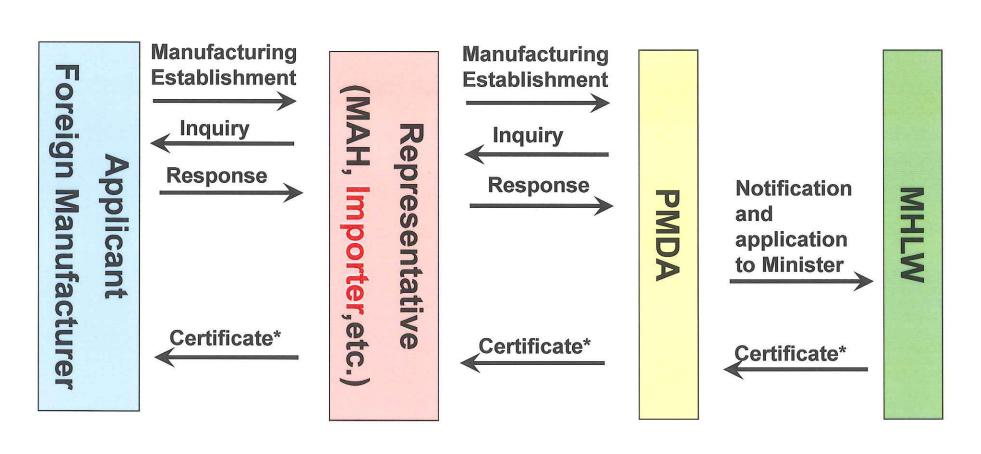
GMP Compliance Inspections include

- 1) Inspections that are conducted at the point of application for new marketing approval or of application for partial changes of approved information, and
- 2) Inspections that are conducted periodically every five years following the obtainment of marketing approval.

(not applicable to OTC but only to ethical use)



The Role of Importer in Application of Accreditation



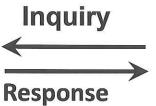
*Accreditation No.



The Role of Importer in Registration of (D)MF

Applicant Foreign Manufacturer





In-Country Caretaker (Importer, etc.)

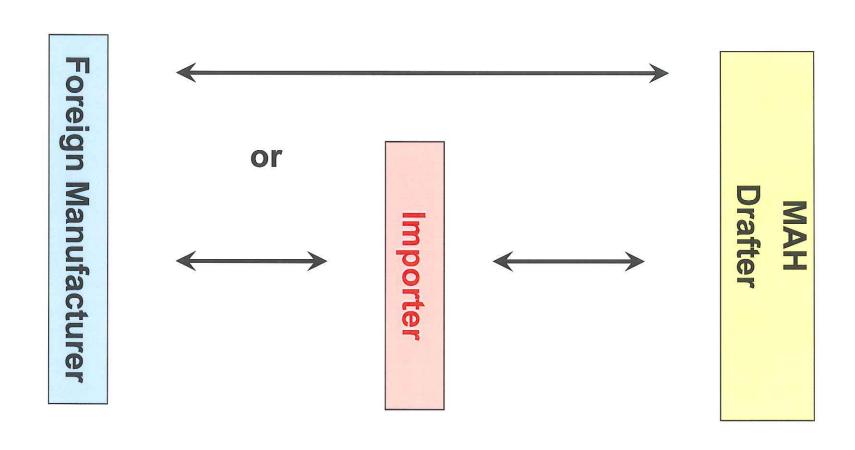


PMDA

*MF No.

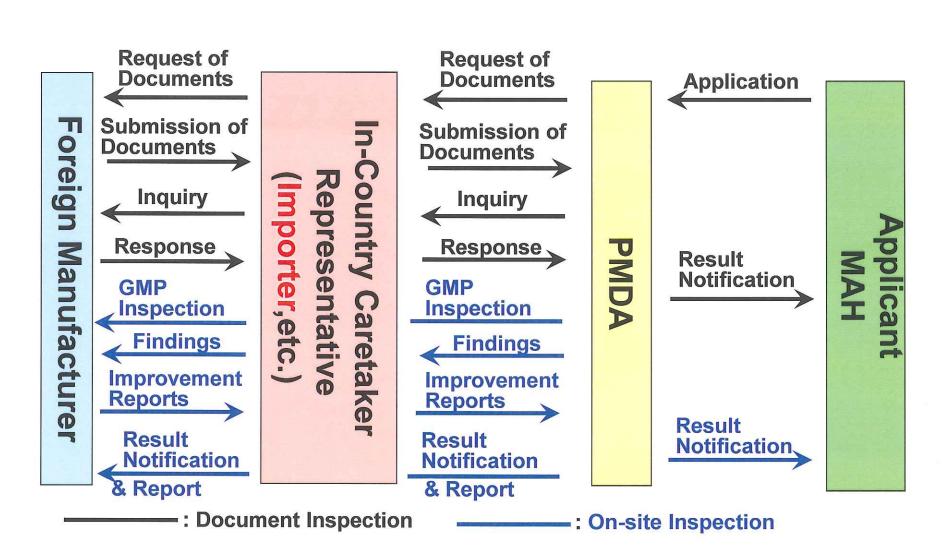


The Role of Importer in GQP Agreement



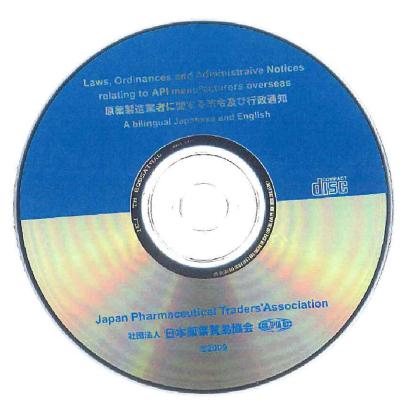


The Role of Importer in GMP Compliance Inspection by PMDA





Always Welcome to CPhI E-28 Booth of Japan Pharmaceutical Traders' Association



CD ROM of
Laws, Ordinances and
Administrative Notices
relating to API
Manufacturer Overseas
Renewal Date: December
16, 2009

¥ 5,000



The End

Thank you for your participation in the meeting.

www.japta.or.jp