Implementation of the OECD GLP principles at test facilities in Japan

Shinoi Sakata

Sumitomo Chemical Co., Ltd.
Osaka, Japan
e-mail: sakatas@sc.sumitomo-chem.co.jp
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Introduction

Test facilities in Japan conduct GLP studies for worldwide submission under the OECD Mutual Acceptance of Data (MAD) system.

<Key Points>
1. Better understanding of multi-GLP program in Japan, OECD GLP principles, and GLP programs in foreign countries to promote OECD MAD system.
2. Good communication with Authorities
3. Global quality network

JSQA comprises most of GLP test facilities in Japan and its activities cover “Key Points”!
What is JSQA?
Japan Society of Quality Assurance

JSQA

URL : http://www.jsqa.com/

OECD Event, Villa Tuscolana, Frascati (Roma), Italy, April 10 – 11, 2008
Japan Society of Quality Assurance

Establishment: February, 1992

Outline:
- Japan Society of Quality Assurance (JSQA) was founded in 1992 as a nationwide organization encompassing all GLP parties such as pharmaceutical companies and CROs, it expanded the area with GCP in 1995, and the area with Post marketing (GVP/GQP/GPSP) in 2006, establishing the present three division system.

Purpose
- The Purpose of JSQA is to raise and develop the knowledge and technical know-how of those involved with quality and reliability assurance for medicines, agricultural chemicals, chemical substances, food items, medical devices, veterinary drugs, and feed additives, among others.
## Activities of JSQA

1. Research related to quality and reliability assurance.
2. Issuance of materials based on collected information and research results.
3. Holding of conference and seminars, etc.
4. Association with concerned government authorities and interested organizations.
5. Collecting information from concerned government agencies and providing information to society members.
6. Association with concerned overseas organizations, collection of overseas information, and providing information to society members.
7. Other matters necessary for this society to achieve its objectives.
Members of the JSQA in 2007

Total 1,800 Members

- GLP Division: Approximately 600 Members
- GCP Division: Approximately 1,000 Members
- GVP/GQP/GPSP Division: Approximately 200 Members

Joining from 476 Companies
Activities of JSQA on GLP
## Study Groups of GLP Division

<table>
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<tr>
<th>No.</th>
<th>Study Group</th>
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<tbody>
<tr>
<td>No.1</td>
<td>GLP Regulations</td>
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<tr>
<td>No.2</td>
<td>Reliability Assurance on Application Dossier for IND (Investigational New Drug) and NDA (New Drug Application)</td>
</tr>
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<td>No.3</td>
<td>Studies under Reliability Standard</td>
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<td>No.4</td>
<td>Nonclinical Study Supporting System</td>
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<tr>
<td>No.5</td>
<td>Eastern Japan Regional Study Group on QA for Nonclinical Study</td>
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<tr>
<td>No.6</td>
<td>Western Japan Regional Study Group on QA for Nonclinical Study</td>
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Study of GLP Regulations

Study Group 1 is divided into four groups below. Each group collects and studies information on GLP regulations, and examines GLP matters, and collects inspection cases reported by GLP Division members. Performances of each group are presented at annual meeting and published every two years (one activity period) to share information among JSQA members.

<Study Group 1>
- Group 1: GLP for pharmaceuticals
- Group 2: GLP for medical devices
- Group 3: GLP for workplace chemicals, feed additives, industrial chemicals, pesticides, veterinary drugs, etc.
- Group 4: GLP regulations of foreign countries

OECD Event, Villa Tuscolana, Frascati (Roma), Italy, April 10 – 11, 2008
Communication with Monitoring Authorities

<Example: Pharmaceutical GLP>

Pharmaceutical and Medical Device Agency (PMDA) answers questions on interpretation of GLP from JSQA at annual GLP training course. The Q & A and inspectional observations presented in the training course are published in the GLP Guide Book every year and shared with all parties concern. JSQA studies the answers from PMDA and inspectional observations furthermore and discussed with PMDA to promote the development of quality test data.
Case 1: Use of Digital Camera in GLP Studies

<Background>

Q & A at Annual GLP training course in 2000:
PMDA’s Guidance: “At present, it is difficult to define image taken by digital camera as raw data. Then, digital image cannot be used in a final report of GLP studies such as irritation study, sensitization study.”

<Trend of Camera Market>
In recent years, Camera market is shifting to digital camera from film camera including camera for funduscopy.

JSQA started to study “points to consider” for using digital camera in GLP studies.
Case 1: Use of Digital Camera in GLP Studies

<Action>

Approach:
Stage 1: Taking photographs by digital camera and transfer the digital image to server/media for storage
Stage 2: Storage after transfer to media

JSQA studied how to assure the quality of digital image in the process of Stage 1 above, put together opinions of members by means of questionnaires (Collection rate: 67%), discussed with Japan Pharmaceutical Manufacture Association, and prepared a document titled “An approach to the use of digital camera in GLP studies”.

Case 1: Use of Digital Camera in GLP Studies

<Discussion with PMDA>

JSQA discussed the document “An approach to the use of digital camera in GLP studies” with PMDA. In the document, JSQA reported that quality of digital image can be assured by strengthening procedures, records, and training below.

<table>
<thead>
<tr>
<th>Procedures</th>
<th>Operation, Method of recording, Storage of data, Method of printing, Definition of raw data, etc.</th>
</tr>
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<tbody>
<tr>
<td>Records</td>
<td>Audit trail of operation, Dated signature of operator, Date and signature of photograph, Identification number of raw data, Signature on printouts, etc.</td>
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<tr>
<td>Training</td>
<td>SOP, Method of recording, Quality/Reliability, etc.</td>
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</tbody>
</table>
Case 1: Use of Digital Camera in GLP Studies

<Current Guidance>

Q & A at Annual GLP training course in 2007:
PMDA’s Guidance: “Digital images are usually used as supplementary data in pathology, funduscopy, irritation study, etc. But it is necessary to assure quality (especially no falsification) of digital image.

<Points to consider>
1. Well trained personnel
2. Fully prepared SOP and records
3. Audit trail of operation
4. Process suitability
Case 2: Procedures and records of general clinical observation using a computerized system

<Background>

Annual GLP training course in 2005:
Inspectional observations on study conduct:
  “General clinical observation should be conducted properly based on SOPs.”
  Various general clinical observation items were described in SOP. But whether observation was conducted according to SOP or not could not be verified by records.

JSQA started to study why the inspectional observations were issued by PMDA and how to improve.
Case 2: Procedures and records of general clinical observation using a computerized system

<Action>

JSQA conducted a fact-finding inquiry on procedures and records of general clinical observation from members by means of questionnaires. (Collection rate: 71%)

Results of questionnaires:
Currently, computerized system is used for general clinical observation at many test facilities. It turned out that in some cases, SOP might not be described practically. For example, when there were no abnormal signs, results of observation were entered together by pushing “Enter/Return” key of computer and it seemed that it took very short time to conduct general clinical observation of more than one animals about various observation items.
Case 2: Procedures and records of general clinical observation using a computerized system

<Action-cont.>

JSQA analyzed the results of questionnaires, prepared a document titled “Results of a fact-finding inquiry on general clinical observation”, and discussed with PMDA.

“Results of a fact-finding inquiry on general clinical observation” Procedures and methods of observation should be provided in SOP more practically and the results of observation should be recorded according to SOP. If observation items are provided in SOP, results of every observation item should be recorded according to SOP.
Global Quality Network


Holding of the Global Quality Assurance Conference (GQAC):

1\textsuperscript{st} GQAC: In 2005 in Florida hosted by SQA
2\textsuperscript{nd} GQAC: In 2008 in Edinburgh hosted by BARQA
3\textsuperscript{rd} GQAC: In 2011 in Kyoto hosted by JSQA

<International project in progress>
“Comparison of the practical GLP Interpretation among tripartite countries”
Understanding differences of practical GLP interpretation by monitoring authorities among USA, UK and Japan due to more harmonizing GLP quality
Global Quality Network

Activities in Asian Countries

Example of performances in 2007: Chinese Taipei

A GLP Workshop sponsored by Toxicology Society of Taiwan and cosponsored by JSQA was held in Chinese Taipei, 2007. JSQA gave lectures and had lively discussion about GLP.

>Title of lectures>
1. Overview of GLP regulation in Japan
2. Overview of GLP inspection system in Japan
3. Point to consider on GLP QA activity
4. Point to consider on GLP Operation
Other Activities

1. Education and Training program
   (1) Basic training course
       Roles and responsibilities of QAU
       Inspection/Audit of protocol, study conduct, records, final report
   (2) Advanced training course
       Group discussion, demonstration, role playing, brainstorming
   (3) Seminar, lecture, panel discussion for GLP personnel

2. GLP-QAP (Quality Assurance Professional) Registration System
   Registration examination has been conducted once a year from 2002.
   205 GLP-QAPs are registered as of 2007.

3. Joint translation program in Japan
   JSQA is responsible for translation of OECD GLP Documents.
Future Goals of JSQA

Strengthen JSQA’s structure, operations and communications furthermore to improve and upgrade the knowledge and technological level of members to be recognized as “Professional group of QA” at home and abroad.
Thank you for your attention.