GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 1: GVP**
Subgroup	**P-1-A**
Theme	**Basic GVP self-inspection methods**

During the term 2014 through 2015, Subgroup A, Study Group 1 of the Postmarketing Division investigated the two subjects, “Application of CAPA” and “Collection of self-inspection Q&A” under the theme of “Basic GVP self-inspection methods.”

“Application of CAPA”

We investigated the possibility of applying effective and efficient self-inspections based upon CAPA methodology, as well as the implementation of CAPA in various situations such as findings of partner companies’ PV audits or by the Japanese regulatory authorities and in every-day cases of deviations. Implementation of CAPA is a requisite for EU-GVP, however since the Japanese GVP ordinance does not require it that it seems the conduction is to be left to the discretion of individual companies. Therefore, the members of this group first performed a questionnaire survey regarding the implementation of CAPA to grasp the situation of each company. Based on the results of the questionnaire survey, manners and actual case studies for each CAPA of each company have been compiled. Concerning the CAPA records/management, proposals are compiled based on the content of the lectures given by a document management system vendor.

“Collection of Self-inspection Q&A”

To investigate self-inspection methods, it is essential to collect information on how each company are handling self-inspection. Concerning GVP self-inspection, we considered to prepare a collection of Q&A including even the most elementary issues that people may be too embarrassed to ask. We solicited questions that people struggle with on a daily basis and problems, for example, ways to increase efficiency, etc., from the group members’ companies. The answers from these questionnaires reflecting the actual situation of each company were compiled as deliverables and also we have discussed, examined and proposed effective and efficient methods for self-inspection.

We would be pleased if the deliverables of our group will contribute to the advancement of PV tasks and self-inspections/audits of each company and the concerned individuals.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 1: GVP**
Subgroup	**P-1-B**
Theme	**Investigation of Pharmacovigilance measures**

Recently the environment surrounding the pharmaceutical industry has undergone big changes on a global scale. The field of pharmacovigilance (PV) has accordingly also been transformed against this background, the European Union (EU) in particular has enforced the "Good pharmacovigilance practices (EU-GVP) modules" as a guidance in July 2012 to replace the previously used Volume 9A, and this has led to enhancement of the PV system. This change has also significantly influenced the situation in Japan Marketing authorization holder (MAH) companies operating globally, so they will have to strengthen their existing PV systems, and have sales license agreements with EU pharmaceutical companies will have to construct PV systems that comply with these guidance. At the same time, these companies are also subject to the inspections by the EU regulatory authorities and audits by business license partners.

However, most Japanese pharmaceutical companies have not sufficiently prepared and ready to comply with such activities. Therefore, Subgroup B, Study Group 1 of GQP/GVP/GPSP Division decided to prepare, "Points to Keep in Mind and Checklist for Undergoing Global Inspections."

This checklist includes various check items such as the collection, assessment, and review of safety information, and the implementation of safety measures. It also provides list of documents that have to be prepared, and the points to which special attention should be paid when preparing the documents. The key points of each item are as follows:

- Concerning the collection , assessment, and review of safety information:
  The safety management division(pharmacovigilance division) should collect safety information that has been obtained from the healthcare professionals, received by the call centre, or submitted on the websites managed by MAHs, within an appropriate time frame and has been managed appropriately in the safety database.
- Concerning the implementation of safety assurance measures:
  After safety information has been collected, assessed and reviewed, the Safety Management Supervisor (in Japan) or QPPV (in EU) should take measures based on the content of the information to ensure the safety to the healthcare professionals, patients, and the regulatory authorities.
- Concerning other items than the above:
  Items listed here are ones that are not covered by an equivalent PV-related system in Japan, but that are specific of EU-GVP or that are regulated in particular detail in EU-GVP.

EU-GVP clearly defines MAH's responsibilities of the enhancement of their PV systems and

also it defines the responsibilities of the respective regulatory authorities, not only MAHs, for the reporting of adverse events, etc. Due to changes in the PV environment on a global scale, the expectation is that the pharmaceutical industry, government agencies, and industry-government-academia partnerships that support medical societies shall cooperative to ensure consistency of safety monitoring and safety measures. We should not forget that, since our activities are performed within the pharmaceutical industry, we are contributing to the health and safety/security of each and every citizen.

We would be pleased if this checklist would be a useful tool to construct robust PV system of MAHs who may receive inspections by overseas regulatory authorities and audits by business license partners and as a checklist for preparations before undergoing such inspections/audits.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 1: GVP**
Subgroup	**P-1-C**
Theme	**Comparative review of Asian PV regulations (Korea, China, Taiwan, Indonesia, Vietnam)**

In association with the rapid advancement of the globalization of corporate activities, various Asian countries have been following the regulations of the EU, US, and Japan as increased control of laws, regulations and voluntary standards have been promoted. However, there are huge differences in the situation concerning the application of PV regulations among different Asian countries, and even within a single country, existing regulations are frequently changed and new ones are introduced. Such regulations often contain many ambiguities compared to Japanese regulations, are not properly controlled, and there are many differences between different companies.

In view of this situation, Subgroup C, Study Group 1 of the Post-marketing Division conducted a preliminary survey of the latest PV regulations targeting mainly 5 countries (Korea, China, Taiwan, Indonesia, and Vietnam) where our participating companies are expanding their business. Local subsidiary/affiliate companies were then asked to investigate any questions and unclear points in the survey results, and we compiled the results of these investigations.

Based on the preliminary survey results, we could confirm that although there are differences in the timeline concerning individual case reports, periodic reports and reports on overseas measures between the different countries, there is a specific system in place. We could also confirm that RMP has rapidly been introduced in recent years, and that there are differences in the situation concerning the introduction/establishment of specific systems that regulate the handling of study reports/literature search, re-examinations, re-assessments, and post-marketing surveys.

Based on the results of investigating the actual situation, we found discrepancies in the answers, even within a single country, apparently because there are no regulations, or the way that the regulations operate is not clear. It seemed to us that this situation came to exist as a result of differences in companies' situation: in case products that are sold in the countries we surveyed this time are also sold in the EU and US, some companies comply with the more stringent regulations among these, while other companies that have not expanded their business to include the EU and US, only comply with Japanese or local regulations. Different companies therefore use different PV regulatory requirements to which they comply.

From now on the regulatory authorities of newly emerging countries in Asia will also consider joining ICH, and the PV regulations of these countries will be further harmonized with the ICH standards. To ensure the smooth operation of PV activities in Asia, it is necessary to obtain the latest local regulations, develop related SOPs, and build a system to apply the

regulations. When applying the system, it is important to adequately communicate with local employees, etc., concerning activities.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 2: GPSP**
Subgroup	**P-2-A**
Theme	**Self-inspection techniques pertaining to Outsourced tasks (sales companies, CRO, etc.)**

The content of outsourced tasks concerning post-marketing surveillance, etc. includes those centred around post-marketing surveys, etc., like case registration, inspection of survey forms, data input/tabulation/analysis, various others like tests, record archiving, system development, etc., as well as the outsourcing and responsibility systems of the contracted pharmaceutical/medical device company and vary for each company. Based on these, it can also be assumed that the views underlying the contracted task management system and quality assurance systems may be different between the various companies. Subgroup P-2-D, Study Group 2 of the Post-marketing Division for the 10th term (2010 to 2011) therefore performed "Investigation of self-inspection methods for outsourced GPSP(Good Post-marketing Study Practice) tasks – assuming partial outsourcing of use results surveillance tasks to a CRO(Contract Research Organization)" (hereinafter, previous deliverable).

Four years have passed since P-2-D has prepared the previous deliverable, and taking the results of greater enforcement of risk management and post-marketing surveillance involving EDC(Electronic Data Caputure) during this time into consideration, we revised the "Checklist of (regular/special) CRO surveys/confirmation" that was published in the previous deliverable, and performed a "Questionnaire survey about outsourced GPSP tasks" of the 79 companies affiliated with the Post-marketing Division.

I. Revision of the "Checklist of (regular/special) CRO surveys/confirmation:"
By adding the item of "Checklist Use Period" to the checklist in the previous deliverable, the timing of inspections was clarified, and the checklist became easier to use. We also revised the content of the checklist based on the present circumstances.

II. "Questionnaire survey about outsourced GPSP tasks:"
We compared the tabulated results with the results of the questionnaire survey in the previous deliverable. In the present investigation, we also performed a new questionnaire survey about the actual situation of newly outsourcing EDC tasks and of outsourcing post-marketing surveillance tasks to the distributors.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 2: GPSP**
Subgroup	**P-2-B**
Theme	**Examination of cases from conformity inspections of reexamination application dossiers**

New drugs, etc. are subject to a reexamination on the basis of the provisions of Article 14-4 of the Act on Securing Quality, Efficacy and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (hereinafter, the PMD Act). Data collected and prepared in accordance with the following ministerial ordinances and regulations must be attached to reexamination application dossiers: parts of the Ordinance on Standards for Conducting Post-marketing Surveillance and Studies on Drugs and Ordinance on Standards for Conducting Post-marketing Surveillance and Studies on Medical Devices (Good Post-marketing Study Practice; GPSP ordinance), the Ordinance on Standards for Post-marketing Safety Management of Drugs, Quasi-drugs, Cosmetics and Medical Devices (Good Vigilance Practice; GVP ordinance), and the Enforcement Regulations of the Act on Securing Quality, Efficacy and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (hereinafter, the Enforcement Regulations of the PMD Act), and the Ordinance on Standards for Conducting Clinical Trials on Pharmaceuticals and the Ordinance on Standards for Conducting Clinical Trials on Medical Devices (Good Clinical Practice; GCP Ordinance).

Marketing authorization holders, etc. strive to assure the reliability of reexamination application dossiers by constructing an organizational framework for complying with these Enforcement Regulations of the PMD Act and ordinances and by specifying operating procedures for post-marketing surveillance (PMS) activities and post-marketing safety management activities. The reexamination application dossiers prepared as above can proceed to a review of the reexamination application dossiers only after receipt of a notification of "Compliant" results of a conformity inspection by the Pharmaceuticals and Medical Devices Agency (PMDA). Therefore, knowing specific cases of PMDA observations at conformity inspections will be informative for making more reliable activities via objective self-evaluation of own activities and will also be useful for a smooth proceeding to a review.

To date, Subgroup B, Study Group 2 of the Postmarketing Division has collected cases of PMDA observations, etc. at conformity inspections and has given feedback on the cases using questionnaires targeted at corporations belonging to the Division. In this term, our group conducted questionnaire surveys in September 2014 and June 2015 to collect cases of PMDA observations, etc. at conformity inspections conducted between April 2013 and March 2015 and subdivided the cases. Among them, a special focus was placed on the cases of data management (DM)/tabulation analysis, preparation of reexamination application dossiers, self-inspection, education and training, entrustment, and GVP to examine the backgrounds,

trends, points to notice, etc. regarding them. We hope that the results of our examination will be referenced together with the cases of PMDA observations collected via the questionnaires. Furthermore, we interviewed companies that accepted our offer in November and December 2014 and August 2015 to inquire the content of the latest conformity inspections and detailed actual actions in response to the inspections, which are difficult to identify from questionnaire responses alone. During the interviews in this term, we made a new attempt to collect up-to-date information focusing on the safety information management sheet. We could appreciate if the information could serve as reference for your daily work.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 2: GPSP**
Subgroup	**P-2-C**
Theme	**Quality assurance techniques using EDC for use results surveys** – centred on start-up to full functionality of ASP-type EDC –

During the 12th term, Study Group 2, Subgroup C of the Post-marketing Division examined the theme, “Quality assurance techniques using EDC for use results surveys.”

Post-marketing surveys using the EDC system (hereinafter, EDC surveys) have recently increased; however, when EDC surveys are performed it is important that applicable data are appropriately input and managed. Therefore, the items required by the user pharmaceutical companies (hereinafter, makers) have to be fully reflected in the EDC system. However, the department in charge of post-marketing surveys does not always have workers who are familiar with the system, and limits on the period from marketing approval to survey implementation and other background factors are often involved. Base on such limits, the preparation of URS is often outsourced to vendors, and in some cases the requirements are set and approved in consultation.

Taking these circumstances into consideration, we examined how to secure validation that complies with the requirements of the ER/ES policy, and how to fulfill the responsibilities of the contracted makers as required by the GPSP ordinance.

In reference to the various notifications and EDC control sheets, and assuming application of the ASP-type EDC system that is becoming the current mainstream, we extracted the self-inspection items necessary to from the time of starting the system until it is fully functional and compiled the points to keep in mind to secure the reliability and the inspection method.

Keeping in mind that the theme we examined follows on the theme, “Basic self-inspection techniques - Quality assurance techniques using EDC for use results surveys” that Study Group 2, Subgroup A, Post-marketing Division examined during the previous term, please also refer to that concerned deliverable.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-A**
Theme	**Actual practice of education and training for manufacturing plant auditors**

[Background] Under the Japanese laws and regulations, marketing authorization holders (MAHs) are required to verify that manufacturing and quality control are conducted properly and efficiently by manufacturers, etc. As a measure to verify it, audit for manufacturing plant is generally conducted.
The persons in charge of this audit for manufacturing plant (hereinafter, auditors) assume an important role in the quality assurance of drugs; however, the current Good Quality Practice (GQP) ordinance and others provide neither definite qualifications nor specific guidelines for education and training for the auditors. In the light of the present situation, our Subgroup P-3-A conducted a questionnaire survey on the actual practice of education and training given by MAHs to auditors and summarized the results as deliverables.

[Overview of the questionnaire] A questionnaire survey was conducted in MAHs among 81 member companies of the Postmarketing Division, JSQA to ask about auditor qualifications, auditing guidelines, confirmation of observations, content of education to auditors, capability evaluation, and others.

[Results and discussions] The questionnaire was responded by 36 companies. Based on these responses, we compiled each MAH's efforts for education and training for auditors, along with the actual practice from preparation for auditing to post-audit follow-up, etc.
The result revealed remarkable results, including (i) approximately 60% of MAHs have no educational or training programs; (ii) at least 80% of MAHs have not conducted capability evaluations continuously; and (iii) at least 90% of MAHs have not given education or training according to the ability level of auditors. These results suggest the present situation where the maintenance and improvement of qualification for auditors are left to individual efforts. In the future, we hope that an educational and training program serving as the industrial standard will be designed and an accreditation system for auditors will be developed under the leadership of JSQA.

[Afterword] Ten years have passed since MAHs were not required to have any manufacturing plants according the enforcement of the revised Pharmaceutical Affairs Law in April 2005. Recently, it has been common that one manufacturer makes a number of contracted products by concluding contracts with many MAHs. In this situation, if auditors from different company express different opinions, the plant staff will be puzzled as to how to handle the opinions. We

would appreciate it if our deliverables could be informative for educators and trainers of auditors and also could be helpful in strengthening the partnership between manufacturing plants and MAHs.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group: GQP**
Subgroup	**P-3-B**
Theme	**Guidelines for Quality Auditing (Intermediate Level)**

The JSQA P-3-B Group, which is composed of several QA members from different Marketing Authorization Holders (MAHs), discussed the best way to audit drug manufacturers, and conducted case studies of quality audits to prepare training materials that form the base for quality audits of drug manufacturers. In March 2014, the group prepared the "guideline for quality auditing (beginner's level)" to foster quality auditors for domestic non-parenteral drug manufacturers during its activities.

After the guidelines were published, environmental changes such as Japan's participation in PIC/S, globalization of the drug supply chain and an increasing audit frequency by overseas manufacturers that affect MAHs occurred, and there are some differences between Japanese regulatory requirements and others such as PIC/S, EU-GMP and cGMP. These environmental changes also required the addition of new quality topics to reinforce the beginner's level guidelines. During this time, the P-3-B Group prepared "guidelines for quality auditing (intermediate level)" to reinforce the original guidelines.

Quality Audits are conducted by MAHs to confirm not only GMP compliance, but also consistency between the authorization dossier and the quality agreement, and these audits serve as a tool to enhance continuous GMP system improvement. In these guidelines, 18 selected most crucial topics that include useful insight and items to be confirmed during the quality audit are discussed. These guidelines also provide practical checkpoints related to the control of the raw materials of stimulants and EHS management because these items are often confirmed simultaneously with quality auditing.

All topics consist of the 3 components of 1. Regulations and Guidelines, 2. Checkpoints During Audit and 3. Training Exercises. These guidelines also explain the background and intention of regulations, and clarify their references, which provide better understanding. The P-3-B Group absolutely believes that profound analysis and correct understanding of GMP intention and the reasons behind its requirements enable you to think flexibly, resulting in the proposal of the best solution during the audit, which is very complex and complicated. In addition, these guidelines include all members' experiences, which provide examples of the logical approach to specific questions. Such very detailed explanations caused these guidelines to fill numerous volumes. However, presentation slides on all topics are included, and they introduce topic summaries that help you search the topics you are interested in quickly and understand the contents. A systematical contents list is also useful for a quick search. Please note that the presentation slides clearly distinguish between regulatory requirements and the P-3-B Group's interpretation and ideas. The latter is indicated by the "⇨" sign in front of each

sentence. The P-3-B Group definitely believes that this distinction allows auditors to prioritize risks appropriately and propose realistic solutions.

Some training exercises with diagrammatic images enable role-playing of practical situations. There are also true or false questions that allow you to reflect on the main points. Both formats explain the answers by specifying the decision evidence such as quoted guidelines, which helps you imagine the connection between regulatory requirements and practical output during actual quality activities. These guidelines provide training materials originally prepared for quality audits of drug manufacturers conducted by MAHs, but are also useful for a broad range of other kinds of training and people such as self-inspectors and for reinforcement of the GMP system at drug manufacturers, due to the discussion of risk-based GMP practice. The P-3-B Group hopes that these guidelines will help many people who are engaged in drug manufacture and contribute to the quality of their activities.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-C**
Theme	**Case study of deviations from the GQP/GMP requirements, complaints, and product recall**

Subgroup C, Study Group 3 of the Postmarketing Division continued to address the same theme as that in the 11th term, "Case study of deviations from the GQP/GMP requirements, complaints, and product recalls." In the present term, to deepen the understanding on the assessment criteria for GQP and GMP, 9 cases of complaints and 6 cases of deviations, experienced by each company which belong to Study Group 3 were collected, and the causes of the case were explored and preventive measures for recurrence were discussed. The assessment index for product release and recall was also examined. Deviation cases collected were a deviation from content specifications, a deviation from temperature during transportation, a deviation of dissolution rates associated with a change in manufacturing methods, contamination, and printing defects. Complaint cases collected were complaints related to packaging (inadequate screwing of the vial cap, detachment of the aluminum label from the vial, melting of tablets in the PTP sheet, deformation of the PTP sheet, discoloration of the blister sheet, inadequate spray of an inhalation product), contamination, discoloration of tablets, and poor reading of the GS code by the barcode reader.
As a result of examination, the assessment index for release and recall were arranged as shown below.

- Occurrence of manufacturing deviations before market release assessment

If a cause investigation indicates that the deviation affected only the pertinent lot, the lot should be dealt with appropriately; this process may not lead to the recall of other lots of products that have been released. If the deviation is considered to affect the other lots that have been released, the need or no need of recall should be determined.

- Occurrence of complaints after market release

A cause investigation will be conducted to check the presence or absence of issues related to the safety, efficacy, and/or the PMD Act, the presence or absence of sterility assurance, and the presence or absence of deviations from the approved items. If whether or not to recall products cannot be decided with the checking results, the identification of the range of influence, the frequency of complaints, etc. will affect the decision of recall.

Regarding complaints, available options before the decision of recall and results of the options are summarized in a decision tree.
We hope that the individual preventive measures for recurrence of the deviation and complaint

cases summarized in this term will be helpful to prevent the market release of products that may lead to recall and also hope that the decision tree related to the index for recall decision will be informative for the decision in each company.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Study Group 3: GQP**
Subgroup	**P-3-D**
Theme	**Examination of quality assurance techniques related to medical devices** – investigation of quality assurance issues related to medical devices –

In the 12th term, Subgroup D, Study Group 3 of the Postmarketing Division investigated quality assurance issues related to medical devices under the theme of "Examination of quality assurance techniques related to medical devices." The methods of investigating the issues were study sessions by calling a lecturer, examination of literature and books recommended by the lecturer, and read-through of the QMS ordinance. As a result, quality assurance issues related to medical devices were arranged as shown below.

- Conduct constant quality assurance activities throughout the period from development to marketing.
- Do not make QMS-based management activities "useless ceremonies" that do not contribute to company growth.
- Place the top priority on improvement of soil for implanting QMS (company quality, corporate culture).
- There are few opportunities to collect basic information relating to quality assurance, such as "quality of design" and "craftsmanship."
- There are few opportunities to collect information relating to specific measures for QMS.

To work on solving these issues, Subgroup D, Study Group 3 of the Postmarketing Division proposes the following activities:

1. Give opportunities to receive education and training about quality systems, including QMS, to the marketing supervisor-general of medical devices, etc., administrative supervisor, and the top management, through the development and conduct of educational programs, holding lecture meetings, distribution of deliverables, and others.
2. Identify issues involved in medical device-related QA arising from the implementation of new QMS and globalization of quality assurance, and provide information to solve the issues.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Special Project Group 1**
Subgroup	**P-T-1**
Theme	**Examination of prefectural inspection cases related to marketing business license for drugs and medical devices (GQP/GVP)**

GQP/GVP inspections related to marketing business license by prefectural governments were started in 2005. JSQA established Special Project Group 1 (hereinafter, the Project) under the Postmarketing Division in fiscal 2006 to collect inspection cases from member companies via questionnaire surveys and to provide information contributing to the maintenance and improvement of GQP/GVP compliance systems. The Project have conducted 6 questionnaire surveys from fiscal 2006 to 2012 and summarized the results as a total of 5 Postmarketing Division reports (No. 07X09, No. 09X01, No. 09X02, No. 10X01, and No. 13X04). During the 7 years, each company has experienced at least 2 GQP/GVP inspections related to marketing business license. The focus of inspection has shifted from the checking of arrangement and streamline of procedures, etc. to the checking of details of the practical operation of the procedures. Along with this shift, each company is not only interested in knowing the content of observations, etc. but also has become eager to understand the backgrounds of the observations, etc. and status of investigation during inspection related to important provisions (discussions with authorized inspectors) as closely as possible. In this context, from the 6th questionnaire in the previous term (fiscal 2012-2013), we have asked to provide information on the contents of observations issued by authorized inspectors, backgrounds of the observations, and responses of marketing authorization holders to the observations, and also to provide information on the status of inspection related to important provisions of the GQP and GVP ordinances. In this 7th questionnaire, our two-part request for information on observations, etc. and for the status of inspection has continued. As provisions of which the collected cases increased in the previous questionnaire, 1 provision of GQP (education and training) and 3 provisions of GVP (post-marketing safety management procedures, examination of safety management information and planning of safety assurance measures, and implementation of safety assurance measures) were added, leading to our request for information on the status of inspection in relation to 7 GQP provisions and 9 GVP provisions. Especially concerning the GVP provision on the entrustment of safety assurance activities, the questionnaire included a question as to the re-entrustment of post-marketing safety management activities, which was newly permitted in the Enforcement Regulations of the revised PMD Act (enforced on November 25, 2014), and we also requested responses from members with no experience of inspection during the survey period (August 2013 to March 2015).

The present 7th questionnaire was sent to 79 representative member companies of the division

from February 20, 2015. Among them, we received responses from 35 companies and obtained 23 cases of inspection from 18 companies (11 cases from Tokyo, 6 cases from Osaka, and 6 cases from other prefectures). In addition, we received 7 responses to the question as to the re-entrustment of post-marketing safety management activities.

Responses relating to observations, etc. that were selected by the Project as cases to be presented to members were 100 responses in total (64 GQP-related responses and 36 GVP-related responses). Apart from these, we received 226 responses regarding the status of inspection (125 GQP-related responses and 101 GVP-related responses), 11 responses regarding re-entrustment, and 72 responses regarding other issues.

Among GQP-related responses, common cases involved observations, etc. related to proper manufacturing control and quality control assurance (15 cases related to Article 10 of GQP) and observations, etc. related to agreements with manufacturers (14 cases related to Article 7 of GQP). The major contents of the former cases were related to GMP inspections of manufacturers conducted by marketing authorization holders, including no conduct of inspections, haphazard inspections, and the progress control of improvements directed by inspectors. The major contents of the latter cases were related to a lack of agreement conclusion. Moreover, responses regarding the status of inspection related to these contents were also common (27 and 23 cases, respectively). Among GVP-related responses regarding observations, etc., the most common cases were concerning examination of safety management information and planning of safety assurance measures based on the examination results (7 cases related to Article 8 of GVP), relating to procedures, etc. for evaluation of collected safety management information.

In addition to the presentation of cases of questionnaire responses, we made comments as the Project on 83 points in the “Editor’s comment” section, as needed, about points to be checked by self-inspection, points to note at the time of implementing work activities, preparations recommended for smooth actions for future inspections, and others. We hope that these comments will be informative to further enhance and strengthen the GQP/GVP compliance framework in the future.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Special Project Group2**
Subgroup	**P-T-2**
Theme	**Examination of education and training for self-inspectors (GVP/GQP/GPSP)**

Special Project Group 2 plans and runs an educational training course to master the self-inspection techniques under the theme of education and training for self-inspectors.

Our group was inaugurated in 2008 and was engaged in preparing for establishment of the division's educational training course. In September 2011, the division held the first session of the "Basic Course: GVP/GPSP self-inspection techniques (general introduction)" for GVP/GPSP self-inspectors to learn the mental attitude and the general process of inspection.

In the previous term (fiscal 2012-2013), we planned to hold another course to learn specific methods of self-inspection of GVP/GPSP activities based on the first course. In June 2013, we held the "Basic Course: GVP self-inspection techniques — each GVP activity —" for GVP self-inspectors to learn the general procedure for each GVP activity, the frequency and sampling method of self-inspection, items to be checked and points for them, etc.

In this term (fiscal 2014-2015), we held the GPSP version of the GVP course held in the previous term, the "Basic Course: GPSP self-inspection techniques — each GPSP activity —" in July 2014 for GPSP self-inspectors to learn the specific inspection techniques for each GPSP activity (organizational framework, written procedures, cooperation, post-marketing surveillance [paper/EDC], entrustment, education and training, and storage). Furthermore, in November 2015, we held the course entitled "Self-inspection techniques of reexamination application dossiers and periodic safety reports." By holding these 2 courses, our group was able to offer opportunities to learn self-inspection techniques for a series of post-marketing surveillance activities from designing and planning the surveillance through the preparation of reexamination application dossiers. In this term, we also started up a new course in the field of GQP and held the GQP version of the first course ("Basic Course: GVP/GPSP self-inspection techniques [general introduction]"), the "Basic Course: GQP self-inspection techniques (general introduction)" for GQP self-inspectors.

We found an extremely high interest in the educational training courses held to date. Especially in the courses held in this term, the fixed number of participants was reached within several days after recruitment, and requests for additional recruitment were made continuously. In this situation, the "Self-inspection techniques of reexamination application dossiers and periodic safety reports" held in November 2015 will be repeated in the same way in March 2016.

As for future tasks, we will first need to fixate the Basic courses that have been held and accumulated since 2011 and the beginner's course that is newly planned for the next term as our division's courses by holding them continuously according to the plan. Using these courses

as bases, we will also consider holding advanced courses, etc. if the number of people involved in education is growing in the future.

GQP/GVP/GPSP Division, Activity Summary of the 12th Term (April 2014 – March 2016)	
Study Group	**Special Project Group 3**
Subgroup	**P-T-3**
Theme	**Examination of RMP-related self-inspection techniques**

After the issuance of the guidance for designing a risk management plan (RMP), "Risk Management Plan Guidance" (Joint Notification No. 0411-1 of Safety Division and No. 0411-2 of Evaluation and Licensing Division, Pharmaceutical and Food Safety Bureau, Ministry of Health, Labour and Welfare dated April 11, 2012) and the notification for the handling of forms and submission, etc., "Concerning the Design of Risk Management Plan" (Joint Notification No. 0426-2 of Evaluation and Licensing Division and No. 0426-1 of Safety Division, Pharmaceutical and Food Safety Bureau, Ministry of Health, Labour and Welfare dated April 26, 2012), applicants who submit applications for approval of new drugs or biosimilars on or after April 1, 2013 have been obligated to prepare and submit an RMP.

In the previous term, Subgroup C, Study Group 2 of the Postmarketing Division, JSQA (activity period, June 2012 to February 2014) first arranged the RMP preparation process as a major task, considering that the appropriate state of reliability assurance and self-inspection of RMP should be worked out, although there were extremely few practical cases of RMP application. As the next step, we prepared a list of documents to be referenced at the time of inspection of each item specified in the RMP and also prepared a checklist for quality assurance by checking the consistency with the reference documents.

At the start of our examination in this term, RMPs for approximately 100 products have been published, leading to the idea that we could conduct an examination based on practical cases. We also considered that more appropriate self-inspection techniques could be explored through a questionnaire survey targeted at member companies of the Postmarketing Division to understand the actual condition of the organizational framework, written procedures, operation methods, activities for reliability assurance, and others. However, partly because it would be slightly premature to consolidate problems and issues of prepared RMPs after the start of operation, we were not able to begin to work on an examination about what viewpoint was used in self-inspection to solve problems. In the present term, we compiled the results of the above-stated questionnaire survey to discuss the present situation of RMP application in each company. As for a further examination including the viewpoint of self-inspection, we are looking forward to the study group's activities in and after the next term because an adequate number of inspection cases will be accumulated in each company in the future.