

Changing Roles and Responsibilities of Master File In-Country Caretakers in Japan

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Summary

It is time once again to re-evaluate the roles and responsibilities of the Master File in-country caretaker (MF ICC) and to re-consider the definitions in the Enforcement Regulations of the Pharmaceutical Affairs Law (PAL).

Foreign manufacturers have to register a Master File (MF) to obtain drug approval in Japan, and it is essential that there is open communication and transparency between the manufacturer and its local counterpart involved in the MF activities. Indeed, constant and frequent communication helps to build up and maintain good working relationships.

If the MF applicant is a foreign manufacturer, it shall appoint a person or a company as the MF ICC. The duties of the MF ICC are defined by the Enforcement Regulations of the PAL, but in practice the MF ICC usually works beyond the precise requirements of the law. Practical major activities of the MF ICC include registering the MF, responding to inquiries, and maintaining/managing the MF. Recent comments from the Pharmaceuticals and Medical Devices Agency (PMDA) imply that MF ICCs could be encountering difficulty in performing their roles, meeting their responsibilities and coping with high demand.

Although the MF ICC is not required legally to review data source/data documentation, reviewing them before registering the MF is critical in practice, as the MF is regarded as a part of the approval review. Conducting on-site audit/visit is also important to support data review.

PMDA investigates the MF based on the MF content and any inquiries will be sent to the MF registrant through the MF ICC. If the MF ICC is able to give a timely reply, this would expedite and ensure smooth transitions during investigations. Apart from registering the MF and responding to PMDA inquiries, maintaining/managing the MF is another very important activity. The acronym ALCOA (CCEA) (Attributable, Legible, Contemporaneous, Original and Accurate (Complete, Consistent, Enduring and Available when needed)) offers helpful suggestions to the MF ICC in consideration of its roles and responsibilities.

The MF ICC is intrinsically involved in MF issues, especially communication among the MF registrant, regulatory bodies and marketing approval applicants/holders (MAAs/MAHs). PMDA has identified several problems caused by MF ICC's misinterpretation, miscommunication, insufficient verification and checks, etc., and has emphasized the changing nature of the MF ICC's roles and responsibilities.

Requirements on the MF ICC have increased since 2005 when the MF system was first introduced in Japan. Demands on and expectations of the MF ICC will continue to expand. To meet these growing requirements, MF ICCs should continue to improve their capabilities to maintain high standards of performance, to continuously upgrade knowledge/know-how, and to keep pace with world trends/sophisticated methods.

Key words

Master File in-country caretaker (MF ICC), Master File registrant, Communication among persons/companies/regulatory bodies involved in MF activities, ALCOA (CCEA)