FDA 食品藥物管理署
Food and Drug Administration

藥廠GMP品質管理人員制度說明會

QP、AP及監製藥師之權責說明

風險管理組
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105年4月19、20日

製造業藥商聘用藥師法源

藥事法第29條

西藥製造業者，應由專任藥師駐廠監製；中藥製造業者，應由專任中醫師或修習中藥課程達適當標準之藥師駐廠監製。

違反者以第92條處罰鍰

藥師法及施行細則

藥師法第15條

藥師業務如下：

- **藥品販賣或管理。(細則第6條)**
- **藥品調劑。**
- **藥品鑑定。**
- **藥品製造之監製。(細則第9條)**
- **藥品儲備、供應及分裝之監督。(細則第10-12條)**
- **含藥化粧品製造之監製。**
- **依法律應由藥師執行之業務。**
- **藥事照護相關業務。**

藥師法施行細則第9條 -藥品製造之監製

- 藥師執行本法第十五條第一項第四款或第六款所定藥品或含藥化粧品製造之監製，其職責如下：
  - 關於申請製造藥品或含藥化粧品查驗登記所需樣品之試製及其品質管制紀錄、檢驗（定）規格、檢驗成績，以及申請書所載原料名稱、分量、製法、效能、用法、用量、配方依據、類似製品之審核事項。
  - 關於原料、物料之檢查、鑑別及保管技術之指導事項。
  - 關於製造之指導、檢驗設備之維護及建議改良事項。
  - 關於製造、加工、品質管制程序及技術之擬訂與作業之監督事項。
  - 關於成品庫存、保存之檢查與指導事項。
  - 其他有關藥學技術事項。
- 藥師執行前項各款事項，應簽章負責作成紀錄，由藥品或含藥化粧品製造業者列入檔案以備查考。

廠內應有監製藥師明確職務說明，並依其權責留有相關簽章紀錄。

發函重申監製藥師職責

102.04.15 FDA風字第1021101035號函

為確保藥品品質與安全，本局重申廠內應落實監製藥師對於藥品製造之監管職責，請轉所屬會員知照，請 查照。

102.04.29 FDA風字第1021101330號函

為確保藥品品質與安全，請轉知貴轄區GMP製造業者所聘用之監製藥師，應落實對於藥品製造之監管職責，請 查照。

102.09.17部授食字第1021150572號函

為落實藥物製造業者所聘用之監製藥師監督藥品製造管理之職責，以保障消費者用藥品質與安全，請轉知所屬會員確實依說明事項執行，請 查照。

103.01.02部授食字第1021151125號函

補充說明有關藥物製造業者應落實所聘用監製藥師職責之執行方式，請轉知所屬會員知照，請 查照。

為確保每批產品之品質與安全符合上市許可的要求，本部要求自102年10月1日起，藥物製造業者在每批產品放行販賣時，除需經廠內權責人員（例如品質保證部門主管）負責確認各項作業是否符合GMP的要求並簽核外，監製藥師亦應負責確保廠內生產藥品之處方，製造與品質管制程序與作業等是否與原核准查驗登記相符，並簽章作成紀錄。

102.12.25 FDA風字第1021151973號函

有關製造業藥商許可執照所登記之監製藥師人數乙節，詳如說明項，請 查照。

Authorised Person (AP，被授權人員) (PIC/S GMP)

- 第一章原則：製造許可的持有者及被授權人員另有其他法律責任。
- 1.1(vii) 未經被授權人員認可每一生產批次皆已依上市許可及任何有關藥品之生產、管制及放行的法規之要求生產與管制前，該藥品不得銷售或供應。
- 1.3(vii) 每批產品，非經被授權人員認可符合相關許可之要求，不得放行銷售或供應。
- 1.4 若上市許可持有者不是製造者時，雙方應有一份界定其各自在產品品質檢討上所負職責之技術協議書。負責批次之最終核定的被授權人員與上市許可持有者應確保品質檢討係適時執行且為準確的。

Authorised Person (AP，被授權人員) (PIC/S GMP)

- 1.4 負責批次之最終核定的被授權人員與上市許可持有者應確保品質檢討係適時執行且為準確的。
- 2.3 關鍵人員包括生產主管、品質管制主管，以及如果這兩個人中至少有一位不負責產品之放行時，為放行之目的所指定的被授權人員。
- 2.5(iii) 確保生產紀錄送到品質管制部門前，已由被授權人員評估與簽章。
- 4.27 原物料及產品之放行與拒用，特別是由指派之被授權人員對最終產品放行供銷售，應有書面程序。所有紀錄應可供被授權人取得。
- 6.31 持續進行之安定性試驗的結果，應使關鍵人員，特別是被授權人員能夠取得。

Authorised Person (AP，被授權人員) (PIC/S GMP)

- 第7章原則：該契約應清楚約定，負責放行每批供銷售之產品的被授權人員執行其完整職責的方式。
- 7.5 委託者應確保受託者所交付之所有處理過的產品及原物料均符合其規格，或這些產品係經由被授權人員放行。
- 7.11 契約應明定被授權人員放行供銷售之批次的方式，以確保每一批次皆已符合上市許可的要求而製造與檢查/核對。
- 8.1 應指定人員，並配以足夠的支援人員給予協助，以負責處理申訴及決定要採取的措施。該指定人員若非被授權人員，應使被授權人員知悉任何申訴、調查或回收事宜。
- 8.9 應指定人員負責回收之執行與協調，並應給予足夠的支援人力，以適切迅速的程度處理所有回收事宜。該負責人員通常應與銷售部門相互獨立且該人員並非被授權人員者，應使被授權人員知悉任何回收作業。

Authorised Person (AP，被授權人員) (WHO GMP)

- Role and Position
  - implementation (and, when needed, establishment) of the quality system;
  - participation in the development of the company's quality manual;
  - supervision of the regular internal audits or self-inspections;
  - oversight of the quality control department;
  - participation in external audit (vendor audit);
  - participation in validation programmes.

Authorised Person (AP，被授權人員) (WHO GMP)

- Role and Position
  - The authorized person must be approved by the drug regulatory authority. The licence holder is obliged to inform the drug regulatory authority immediately if the authorized person is replaced unexpectedly.
  - It may be necessary to nominate several authorized persons, one of them having the responsibilities of the overall quality controller and the others responsible for site or branch operations. The person authorizing batch release should be independent from production activities.
  - The drug regulatory authority should approve the authorized person on the basis of his or her professional curriculum vitae. Authorized persons have duties not only to their employer but also to the competent authorities. They should establish good working relations with inspectors and as far as possible provide information on request during site inspections.

Authorised Person (AP，被授權人員) (WHO GMP)

- Routine duties
  - The marketing authorization and the manufacturing authorization requirements for the product have been met for the batch concerned.
  - The principles and guidelines of GMP, as laid down in the guidelines published by WHO, have been followed.
  - The principal manufacturing and testing processes have been validated, if different.
  - All the necessary checks and tests have been performed and account taken of the production conditions and manufacturing records.
  - Any planned changes or deviations in manufacturing or quality control have been notified in accordance with a well-defined reporting system before any product is released. Such changes may need notification to and approval by the drug regulatory authority.

Authorised Person (AP，被授權人員) (WHO GMP)

- Routine duties
  - Any additional sampling, inspection, tests and checks have been carried out or initiated, as appropriate, to cover planned changes and deviations.
  - All necessary production and quality control documentation has been completed and endorsed by supervisors trained in appropriate disciplines.
  - Appropriate audits, self-inspections and spot-checks are being carried out by experienced and trained staff.
  - Approval has been given by the head of the quality control department.
  - All relevant factors have been considered, including any not specifically associated with the output batch directly under review (e.g. subdivision of output batches from a common input, factors associated with continuous production runs).

歐盟 Qualified Person (QP)制度
Directive 2001/83/EC article 41.46.48.49.51

- 製造許可持有者應至少有一個QP履行載明之職責。
- 學經歷、訓練
  - QP應持有藥學、醫學、獸醫學、化學、製藥化學與技術、生物學等之大學學歷或其他認可之學歷。
  - 須接受最短一年的理論與實務訓練。
  - 理論或實務課程包含實驗物理學、普通及無機化學、有機化學、分析化學、製藥化學，包含藥物分析、普通及應用生物化學、生理學、微生物學、藥理學、製藥技術、毒理學、生藥學等。
  - QP應在藥品的品質分析、活性成分的定量分析、確保藥物品質所需的測試與檢查之活動，持續至少兩年的實務經驗。
  - 當一大學課程持續至少五年時，實務經驗的期間可被減少一年；當課程持續至少六年時，實務經驗可被減少一年半。

歐盟 Qualified Person (QP)制度
Directive 2001/83/EC article 41.46.48.49.51

- 職責
  - 各國必須保障QP履行職責時不會受到製造許可持有者的干涉，進而確保：
    - 在藥品生產過程中，確保每一批藥品按照該會員國的法規進行生產和檢查，並與上市許可的要求是一致的。
    - 當藥品的來源為第三國時，無論該產品是否在歐盟國家生產，每一批產品都必需經過一個會員國的完整定性分析、所有活性成分的定量分析，以及其他必要的測試和檢查，進而確保藥品是符合上市許可的要求。
    - 如果該批次藥品的檢驗報告已由QP簽名認可，則該批次藥品在其他會員國銷售時則無需再進行重覆的檢驗。
  - 當藥品從第三國進口時，如果歐盟與出口國已有相關協議，確保藥品的製造方式至少以等同於歐盟GMP進行生產，同時也按照前段進行檢驗，則QP無需進行重覆的檢驗。
  - 藥品被批准放行進行銷售時，QP須簽署放行證明或以放行為目的相關文件；放行紀錄自產品放行日起至少保存五年。

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- Release date: 2015.10.12
- Deadline into operation: 2016.4.15
- Process of certification (1)
  - Manufactured in the EU (1.4)
  - Manufactured outside the EU (1.5)
  - QP responsibility (1.7.1~1.7.21)
- Handling of unexpected deviations
- Release of a batch

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7 In addition, the QP has responsibility for ensuring points 1.7.1 to 1.7.21 are secured. These tasks may be delegated to appropriately trained personnel or third parties. It is recognised that the QP will need to rely on the pharmaceutical quality system and the QP should have on-going assurance that this reliance is well founded.

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7.1 All activities associated with manufacture and testing of the medicinal product have been conducted in accordance with the principles and guidelines of GMP.
- 1.7.2 The entire supply chain of the active substance and medicinal product up to the stage of certification is documented and available for the QP. This should include the manufacturing sites of the starting materials and packaging materials for the medicinal product and any other materials deemed critical through a risk assessment of the manufacturing process. The document should preferably be in the format of a comprehensive diagram, where each party, including subcontractors of critical steps such as the sterilisation of components and equipment for aseptic processing, are included.

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7.3 All audits of sites involved in the manufacture and the testing of the medicinal products and in the manufacture of the active substance have been carried out and that the audit reports are available to the QP performing the certification.
- 1.7.4 All sites of manufacture, analysis and certification are compliant with the terms of the MA for the intended territory.
- 1.7.5 All manufacturing activities and testing activities are consistent with those described in the MA.
- 1.7.6 The source and specifications of starting materials and packaging materials used in the batch are compliant with the MA. Supplier quality management systems are in place that ensure only materials of the required quality have been supplied.

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7.7 For medicinal products that fall within the scope of Directive 2001/83/EC, as amended, or Directive 2001/82/EC, the active substances have been manufactured in accordance with GMP and, where required, distributed in accordance with Good Distribution Practice (GDP) for Active Substances.
- 1.7.8 The importation of active substances used in the manufacture of medicinal products for human use should comply with the requirements of Article 46(b) of Directive 2001/83/EC, as amended.
- 1.7.9 For medicinal products that fall within the scope of Directive 2001/83/EC, as amended, the excipients have been manufactured in accordance with the ascertained GMP referred to in Article 46 (f) of that Directive.

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7.10 When relevant, the TSE (Transmissible Spongiform Encephalopathy) status of all materials used in batch manufacture is compliant with the terms of the MA.
- 1.7.11 All records are complete and endorsed by appropriate personnel. All required in-process controls and checks have been made.
- 1.7.12 All manufacturing and testing processes remain in the validated state. Personnel are trained and qualified as appropriate.
- 1.7.13 Finished product quality control (QC) test data complies with the Finished Product Specification described in the MA, or where authorised, the Real Time Release Testing programme.

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7.14 Any regulatory post-marketing commitments relating to manufacture or testing of the product have been addressed. On-going stability data continues to support certification.
- 1.7.15 The impact of any change to product manufacturing or testing has been evaluated and any additional checks and tests are complete.
- 1.7.16 All investigations pertaining to the batch being certified (including out of specification and out of trend investigations) have been completed to a sufficient level to support certification.
- 1.7.17 Any on-going complaints, investigations or recalls do not negate the conditions for certification of the batch in question.

歐盟 Qualified Person (QP)制度
EU GMP annex 16

- 1.7.18 The required technical agreements are in place.
- 1.7.19 The self-inspection programme is active and current.
- 1.7.20 The appropriate arrangements for distribution and shipment are in place.
- 1.7.21 In the case of medicinal products for human use intended to be placed on the market in the Union, the safety features referred to in Article 54(o) of Directive 2001/83/EC, as amended, have been affixed to the packaging, where appropriate.