Quality of Clinical Trials
-PMDA's Point of View-

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2. **To Ensure the Quality of Clinical Trials**
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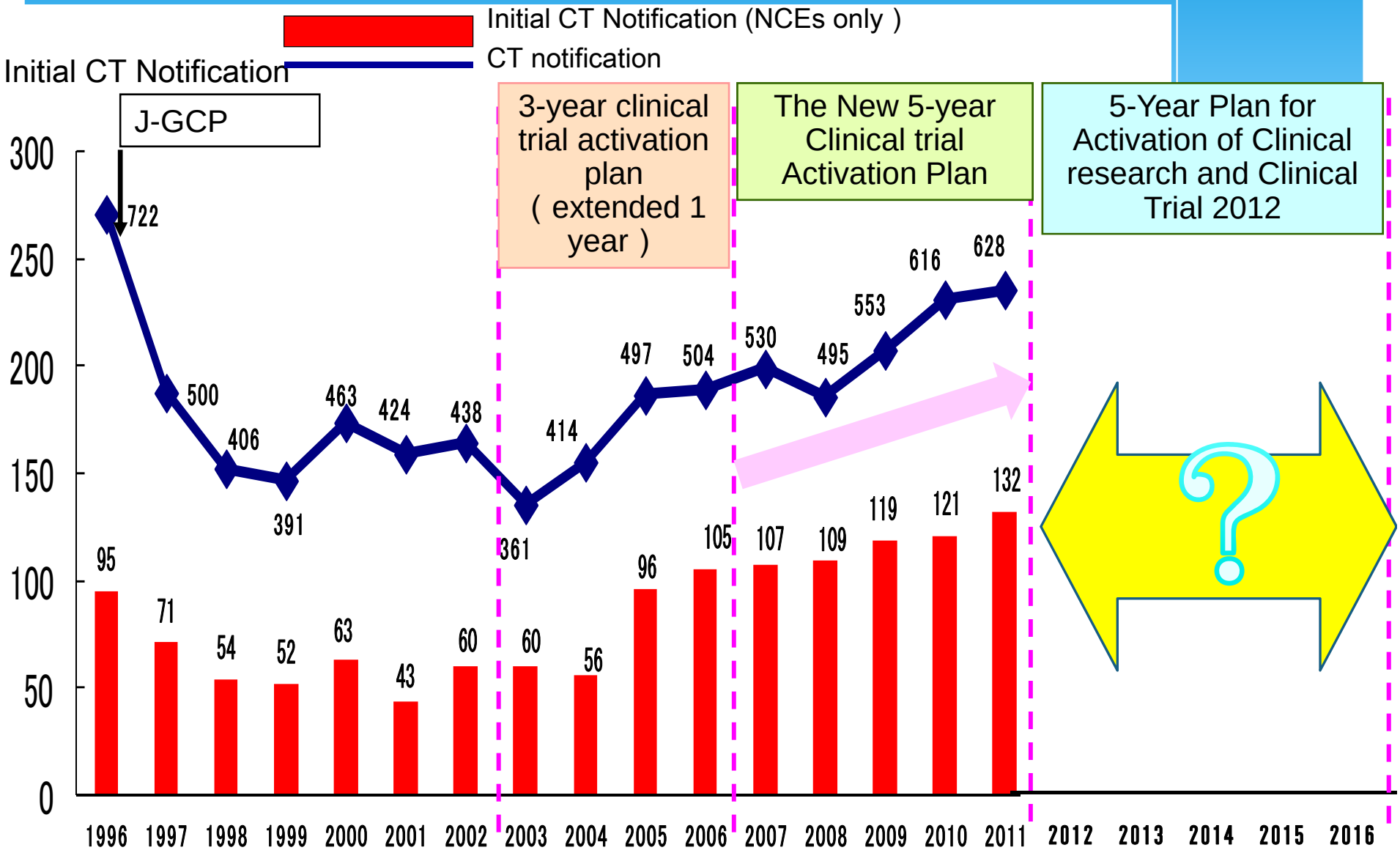
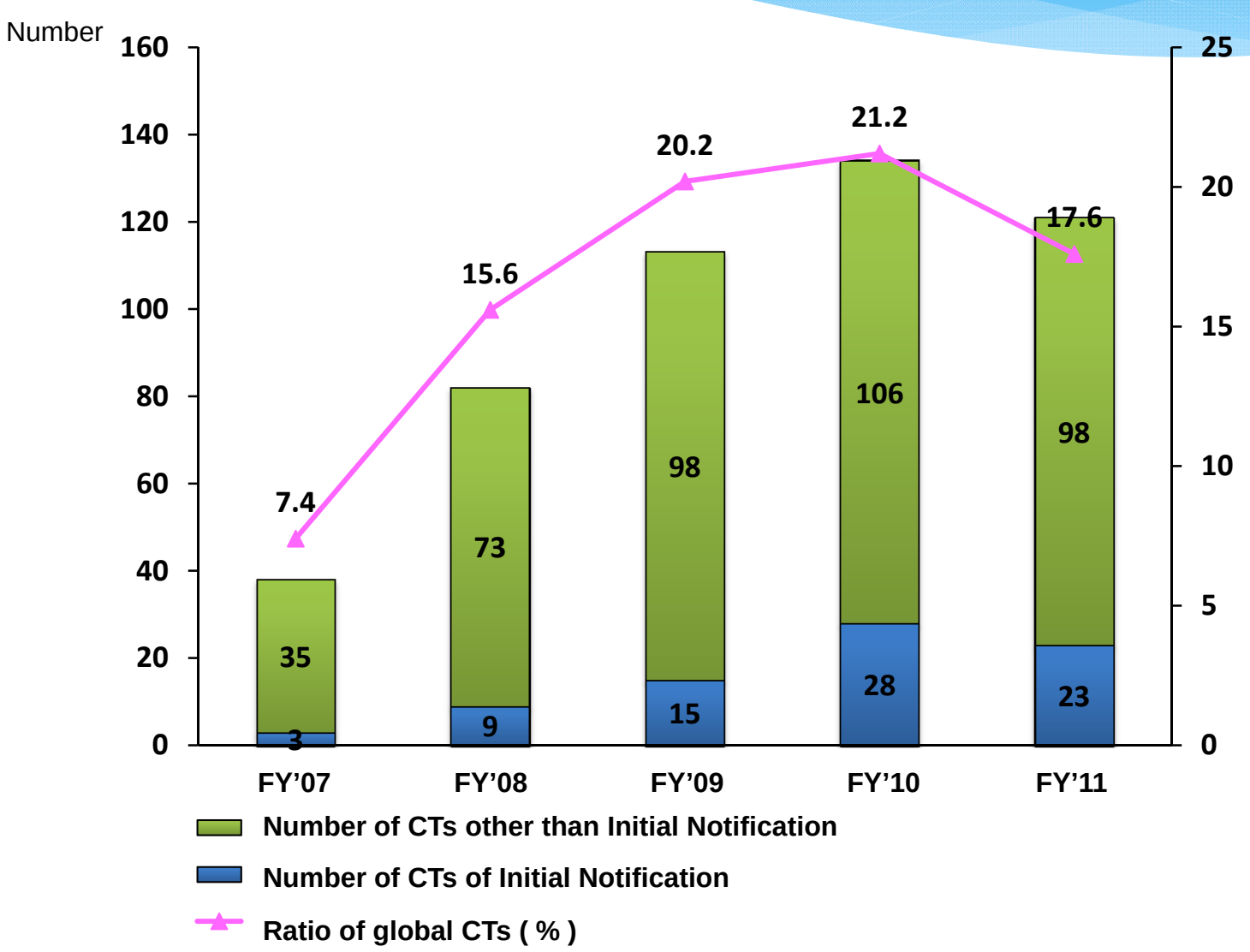
Trend in Notified CTs in Japan



Trend in Notified Global CTs



Current Trend

- 24th October 2011
  Revision of the GCP Notification
- 7th March 2012
  Revision of Notification ‘Uniform Forms Regarding Clinical Trial Applications, etc.
- 30th March 2012
  5-Year Clinical Trials Vitalization Plan 2012
- 6th June 2012
  5-Year Strategy for Medical Innovation
- 31st July 2012
  The Strategy for Rebirth of Japan
- 28th December 2012
  Revision of Ministerial Ordinance on GCP and GCP Notification

Purpose of these Revisions

- To ensure the reliability of the data more
- To promote harmonization of J-GCP and ICH-GCP
- To streamline clinical trial (CT) procedures, saving unnecessary procedures
- To activate CTs led by investigators
- To clarify that Notification is just one form of guidance or an option and not the only way to implement GCP

What to do

- Vigorous Participation in Global Clinical Trials
- Promotion of Early-phase Exploratory Trials for Creation of Innovative Pharmaceuticals and Medical Devices from Japan

Implementation of High-Quality Clinical Trials

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High-Quality Clinical Trials Are • • •

- Ethical, of course.
- Capable to introduce clear-cut conclusion to the hypothesis set in the protocol. (Scientific)

⇒ Compliance with Good Clinical Practice (GCP)

Compliance with GCP provides···

public assurance that

- ✓ The rights, safety and well-being of trial subjects are protected.
- ✓ The clinical data are credible.

GCP and Quality

- Quality assurancel
- Quality control

Major factors influencing the Quality of Clinical Trials

- **Protocol**

  What kind of data should be collected, and from whom? From when to when? How?

- **Implementation system**

  Are the clinical trials conducted adequately ?

Key to Ensure the Quality

- ✓ Capture the problems on conducting clinical trials (e.g., interpretation of inclusion criteria, exclusion criteria, etc.) as early as possible.
- ✓ Feed back the solutions to all related sites.

▪ ▪ ▪ Monitoring : Initiation, Intervals, Items, etc.

How to monitor is important!

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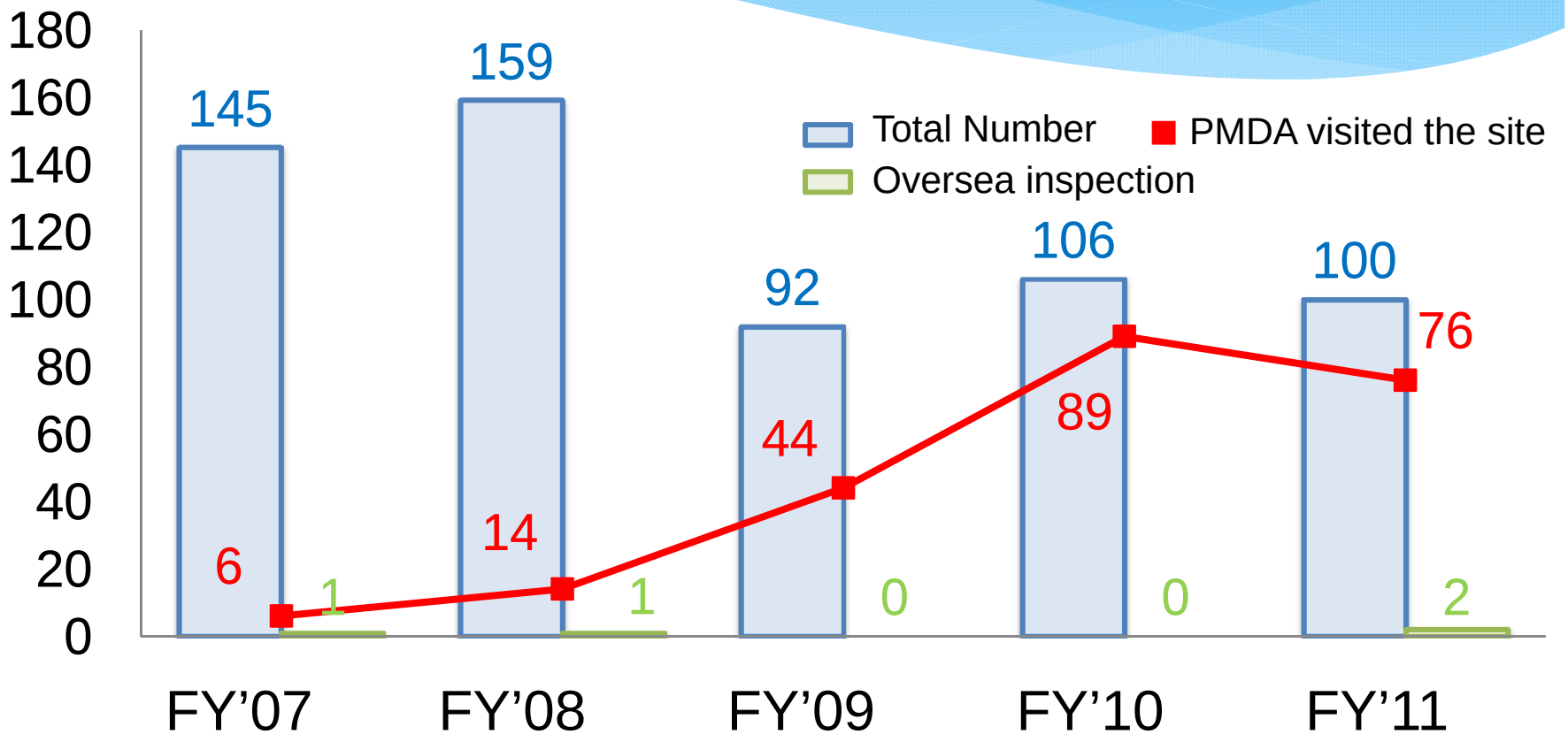
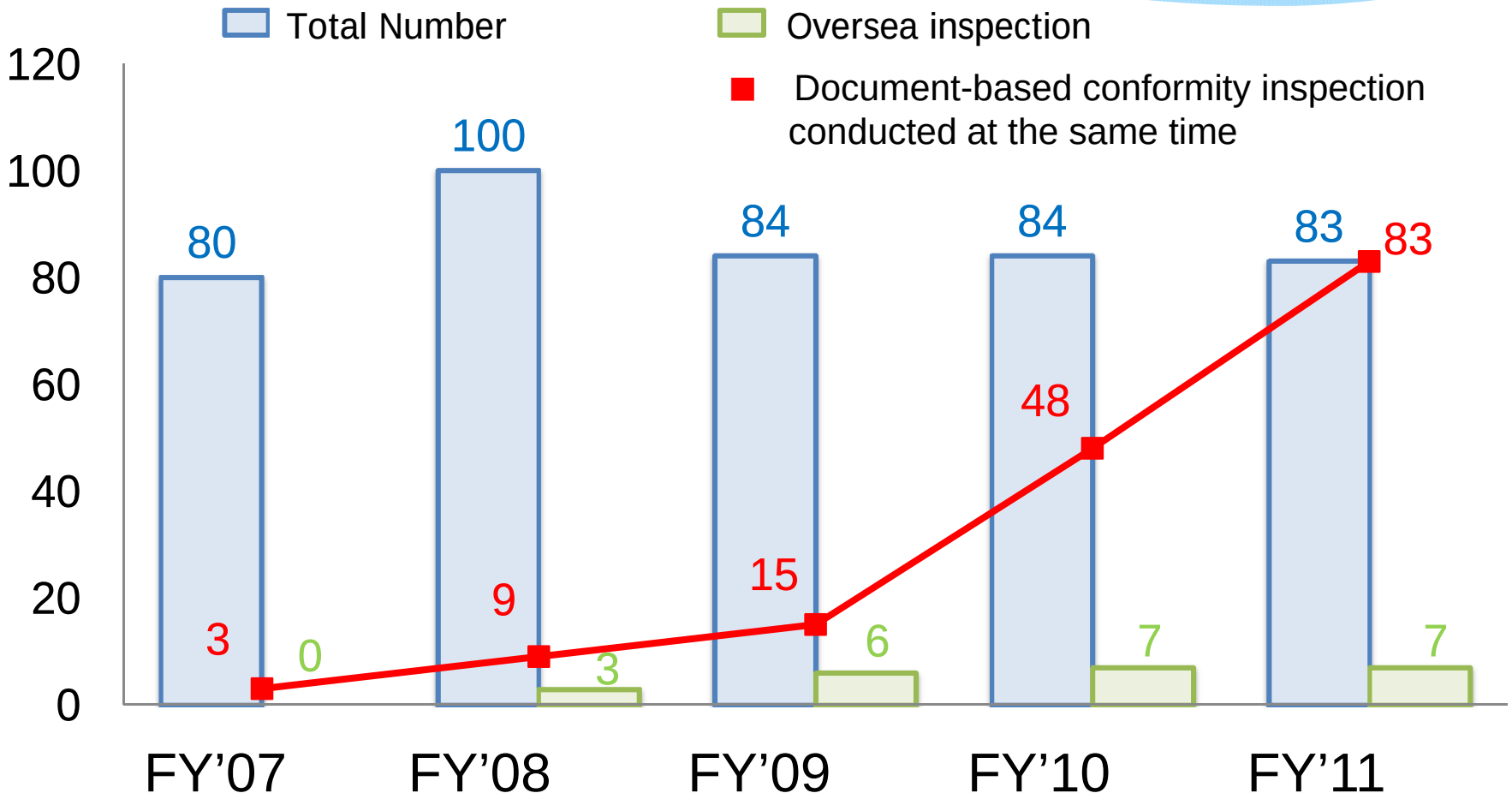
Trend in Document-based Conformity Inspection for New Drug



Trend in GCP On-site Inspection for New Drug



Trend in GCP On-site Inspection

	FY '07	FY '08	FY '09	FY '10	FY '11
Number of drugs (NMEs)	80 (0)	100 (3)	84 (6)	84 (7)	83 (7)
Number of sponsors	80 (0)	100 (4)	80 (6)	78 (7)	87 (7)
Number of medical institutions	167 (0)	216 (6)	180 (13)	188 (14)	181 (13)

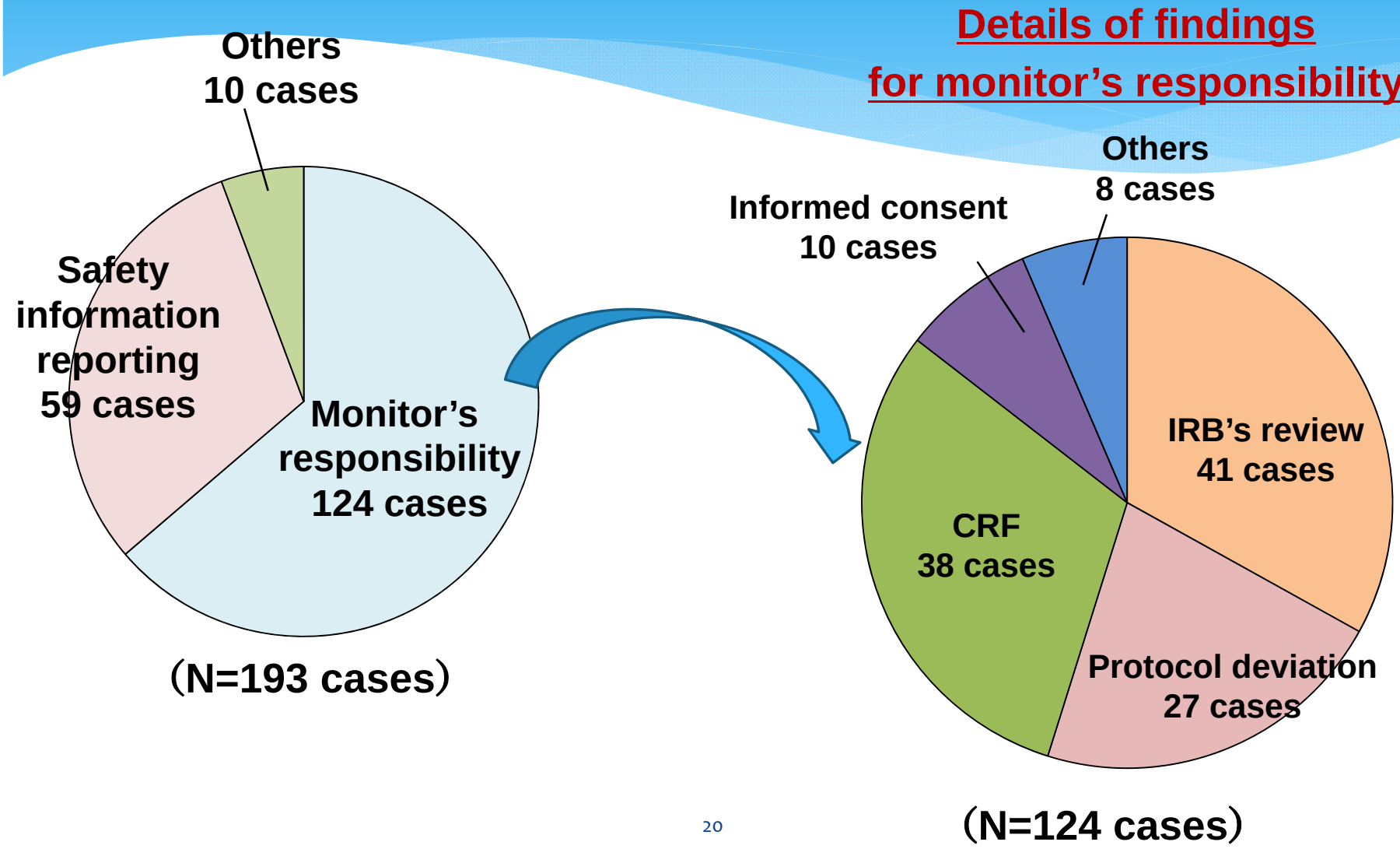
( ): The number of inspections in overseas

Detail of GCP On-site Inspection in Overseas[1)]

	Countries	Number of GCP Inspection	Countries	Number of GCP Inspection
Sponsors[2,3)] (28)	USA	7	Netherlands	1
	UK	3	China	3
	Germany	3	Korea	4
	France	1	Taiwan	3
	Switzerland	1	Philippines	1
	Belgium	1		
Medical institutions (46)	USA	11	Belgium	1
	Canada	2	Netherlands	1
	UK	4	China	6
	Germany	2	Korea	7
	France	2	Taiwan	6
	Hungary	2	Philippines	2

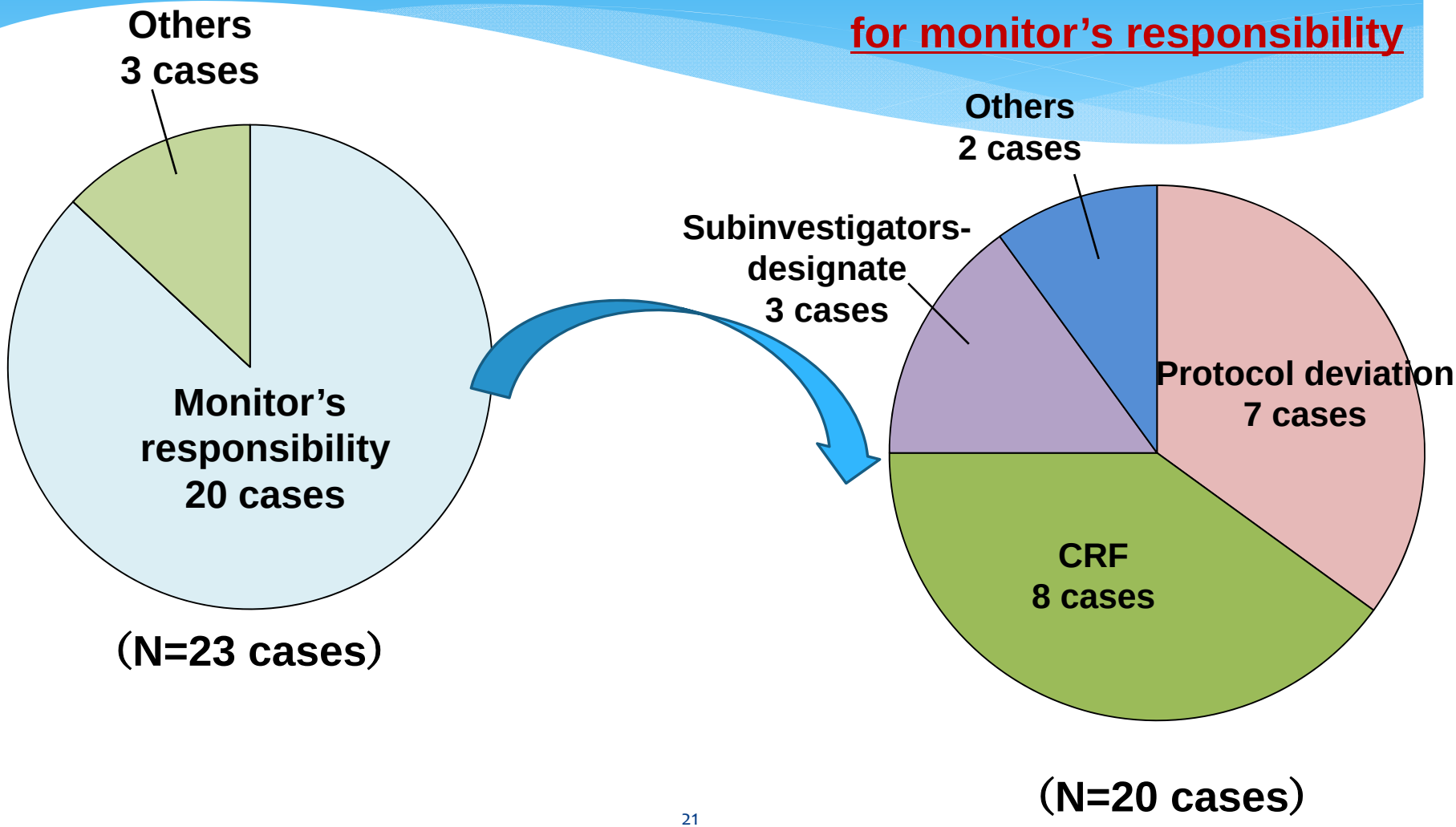
1) Notices of results issued from April 2007 to March 2012, 2) Including the number of CRO
3) 4 cases are GCP on-site inspection and document-based conformity inspection

Findings for Sponsors in JAPAN (FY2009 - FY2011)



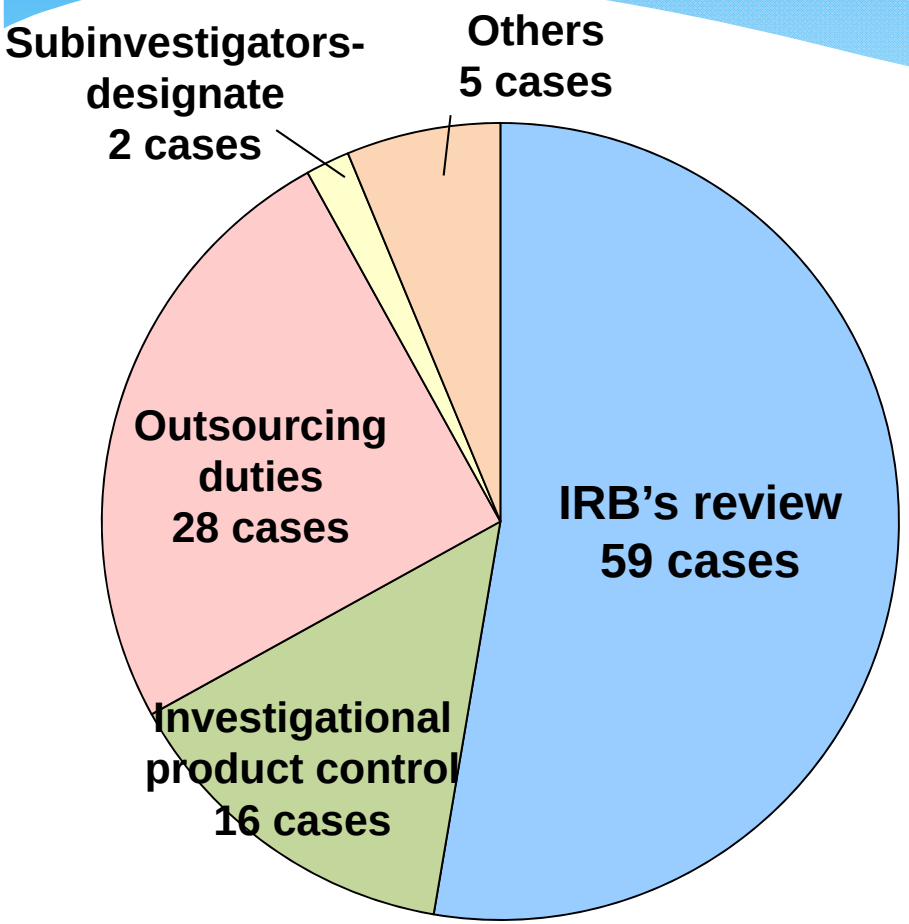
Findings for Sponsors in Overseas (FY2009 - FY2011)

Details of findings for monitor's responsibility



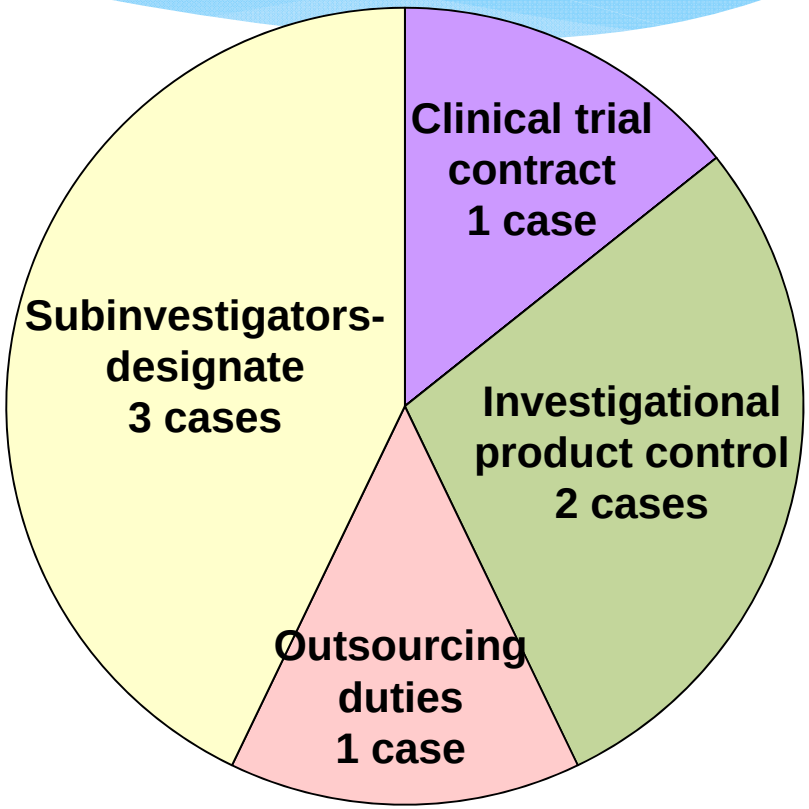
General Findings for Medical Institutions (FY2009 - FY2011)

JAPAN



（N=110 cases）

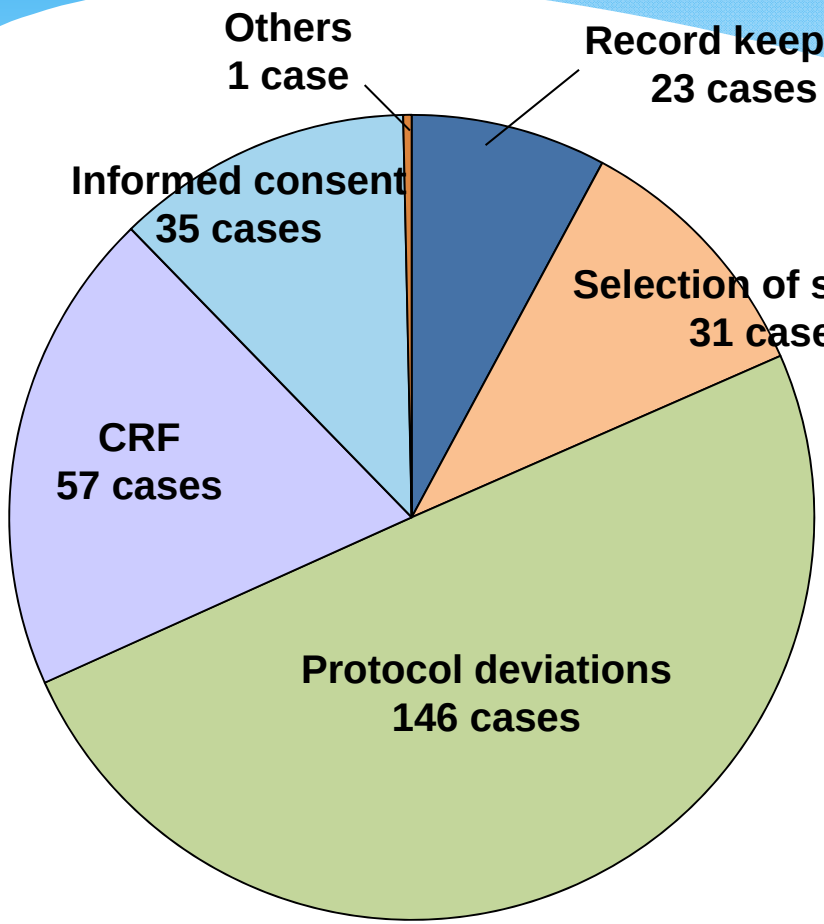
Overseas



（N=7 cases）

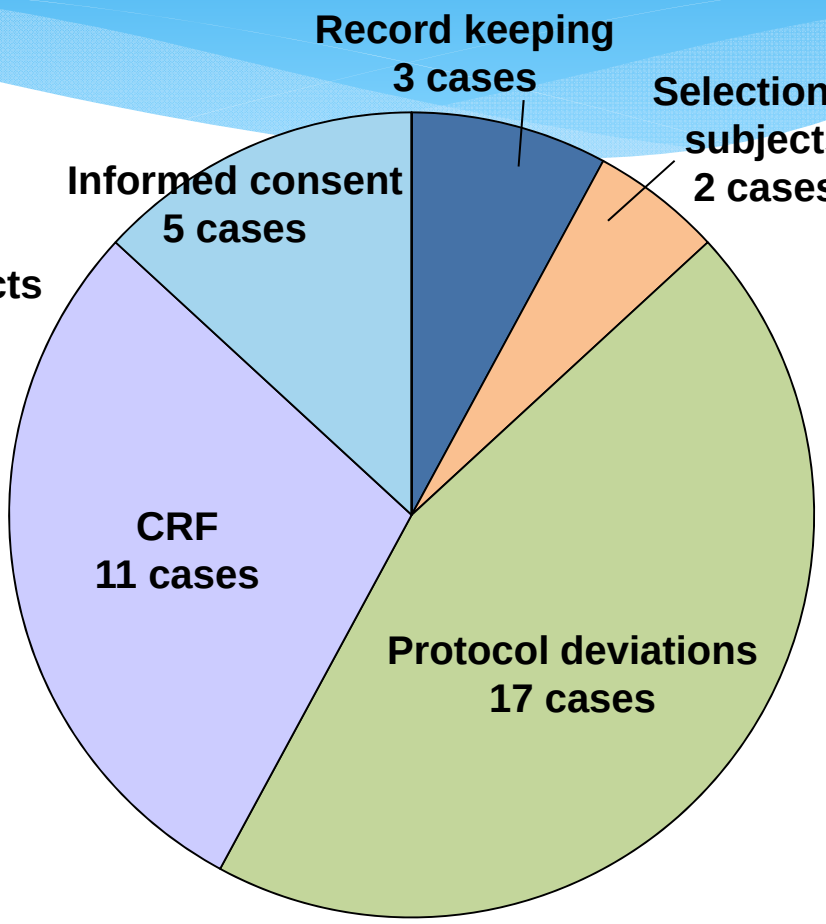
Findings for Individual Subjects
-Medical Institutions- (FY2009 - FY2011)

JAPAN



（N=293 cases）

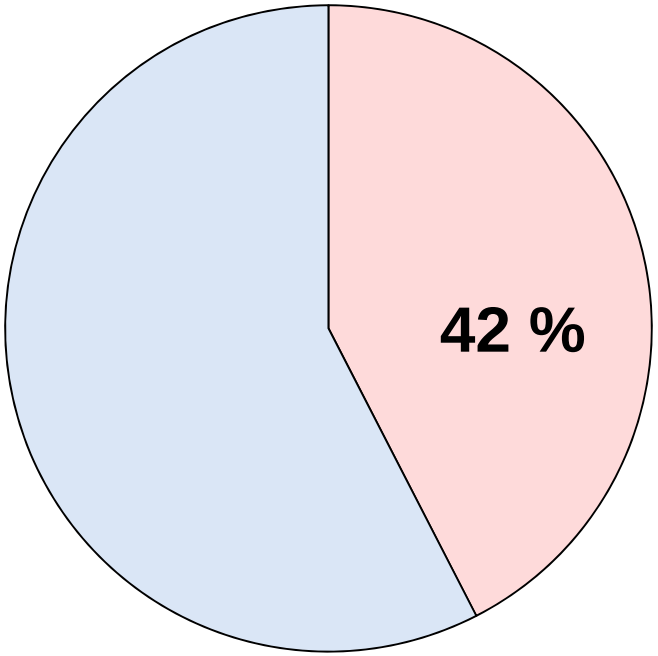
Overseas



（N=38 cases）

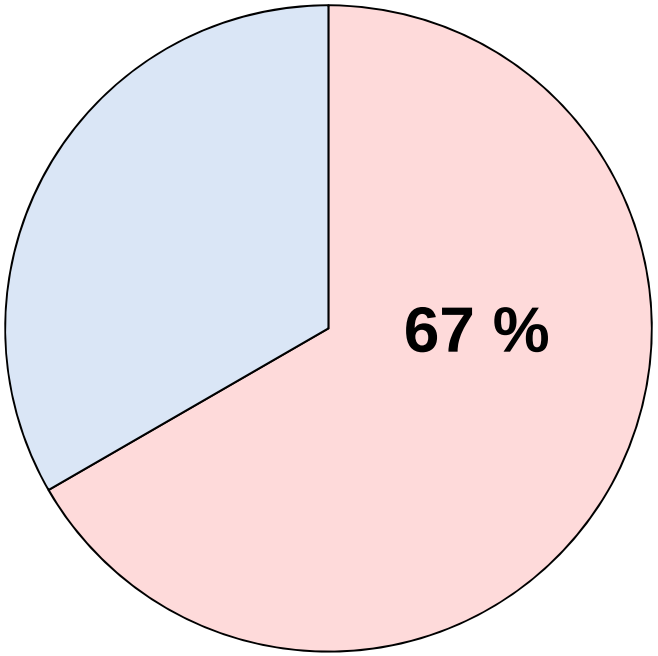
Ratio of Medical Institutions with Findings (FY2009 - FY2011)

JAPAN



（N= 549 cases）

Overseas



（N= 39 cases）

Speculation

- In view of recent inspection results in Japan and overseas, the Quality level of CTs in Japan is …
- The earnestness of Japanese could contribute to ...
- Sometimes some people try to prepare too good-looking document, without error or correction, in the manner against the spirit of so-called ALCOA.

ALCOA : attributable, legible, contemporaneous, original, accurate

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Quality of Clinical Trials Conducted in Japan

- Quality of implementation system of uninspected sites
  •••unknown
- Limited information on CTs conducted in overseas
- Role of Principal investigator to raise the quality level of CTs conducted in Japan
- Smooth communication between sponsors and clinical sites
- Compliance with the protocol

Japanese Identity and Quality of Clinical Trials

- Earnestness and carefulness of Japanese would continuously be the key to establish and/or raise the quality of clinical trials.
- Excessive consideration for making good looking documents could be harmful for compliance with the standard of reliability

For Further Activation of Clinical Trials

- Every person involved in clinical trials should carry out his/her own duty.

- Teamwork

  Every unit ⇒ All Japan

Thank you for your attention!