# Regulatory measures to promote Fast Patient Access in Japan

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# Outline

## 1. Accelerated Regulatory Pathways

- Special Approval for Emergency
- Emergency Approval
- SAKIGAKE (Forerunner designation)

## 2. Efficient Review Processes

- Scientific Advices (Consultation Services)
- Efficient Quality Management (Drug Master Files, Post-Approval Change Management Protocol
- Utilization of Digital Tools

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# Accelerating Pathways in Japan

| Type | Features |
|---|---|
| **Special Approval for Emergency** | • An emergency situation requires an unapproved medical product to be used to prevent damage to the public health caused by the spread of diseases<br>• Such emergency situation cannot be managed appropriately by any means other than the use of the unapproved product<br>• Legally available in a country with a regulatory system for medical products that is equivalent to Japan |
| **Emergency Approval** | • An emergency situation requires an unapproved medical product to be used to prevent damage to the public health caused by the spread of diseases<br>• Such emergency situation cannot be managed appropriately by any means other than the use of the unapproved product<br>• Confirmed safety and estimated efficacy |

# Special Approval for Emergency (SAE)

**Under article 14-3 of the PMD Act**, a certain medical product may be approved when

1. an emergency situation requires an unapproved medical product to be used to prevent damage to the public health caused by the spread of diseases

2. such emergency situation cannot be managed appropriately by any means other than the use of the unapproved product, and

3. such product is legally available in a country with a regulatory system for medical products that is equivalent to Japan

# Marketing Approval in Emergencies

New mechanisms to enable early marketing approval in emergencies.

1. Eligibility of pharmaceutical, etc. to which the early approval is applicable

   A pharmaceutical, etc. that needs to be used urgently in order to prevent the spread of a disease or other health hazard that could seriously affect the lives and health of people is eligible for early approval if there is no alternative existing treatment.

2. Application standards

   Assuming that safety has been confirmed, approval may be granted if the efficacy of the pharmaceutical, etc. has been estimated.

3. Conditions and term of approval

   As approval is granted at the early stage where efficacy has been estimated, conditions are provided to ensure the proper use of the pharmaceutical, etc. and restrictions are set in place that limit the duration of the approval to a short term.

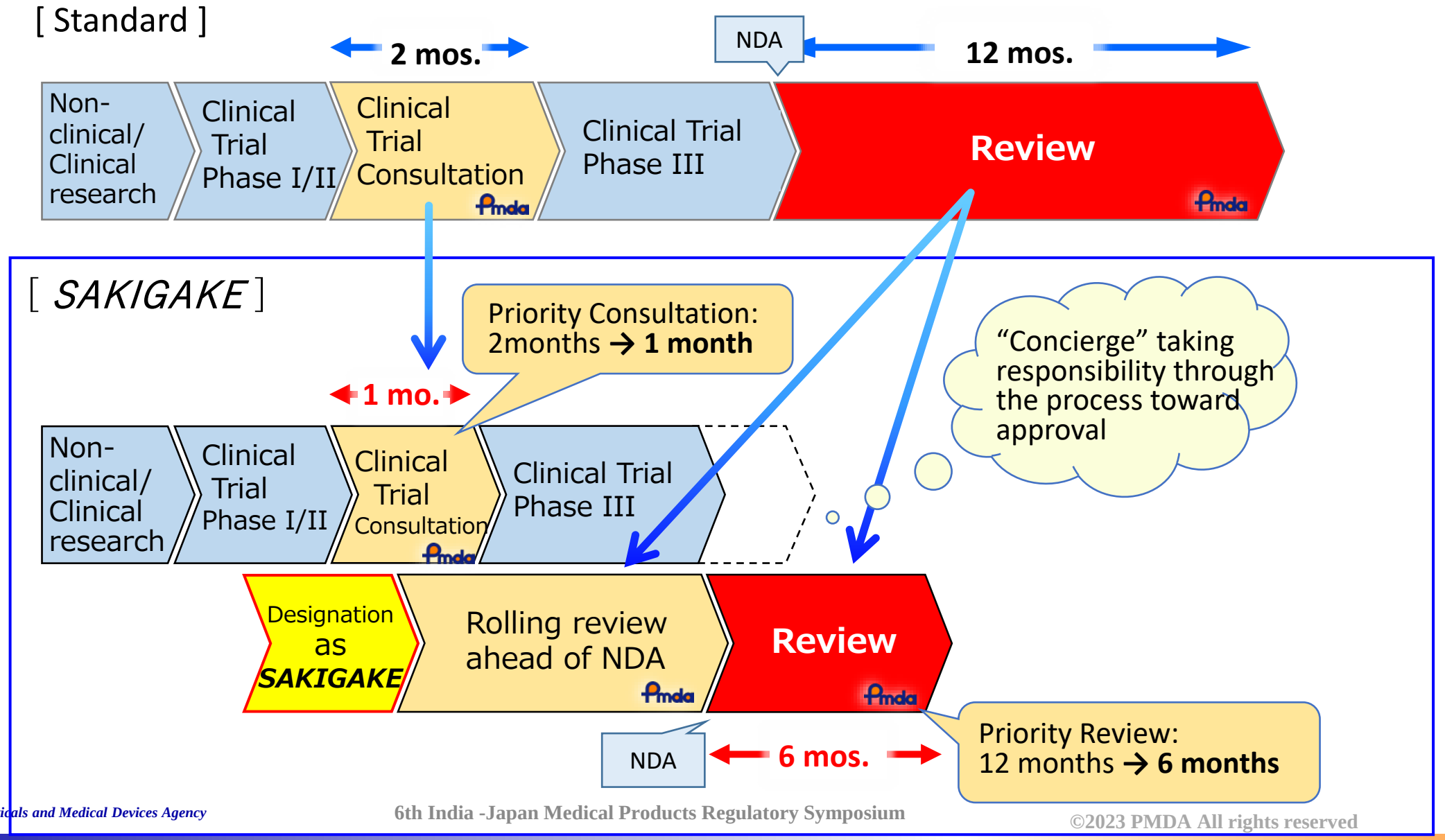
4. Special measures to expedite review process

   Special measures are introduced for GMP inspections, national verifications as well as regulations on containers and packaging of the pharmaceutical, etc., in order to expedite review process for approval.

# Accelerating Pathways in Japan

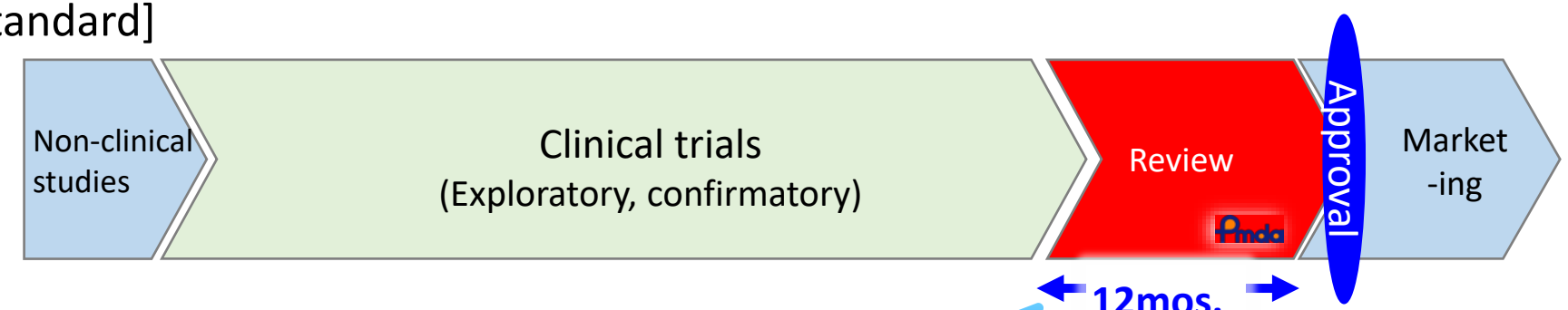
| Type | Product Features |
|---|---|
| **Expedited review** | In a particular situation requiring expedited review |
| **Priority review** | Designated as:<br>1. Orphan<br>2. Apparent improvement of medical care and for severe diseases |
| **SAKIGAKE (Forerunner designation)** | • Innovative medical products<br>• For serious diseases<br>• Development & NDA in Japan: being world's first or simultaneous with other countries<br>• Prominent effectiveness expected on non-clinical and early phase clinical studies |
| **Conditional Early Approval** | Early application through confirmation of a certain degree of efficacy and safety in clinical trials other than confirmatory clinical trials |

# R&D process for *SAKIGAKE*

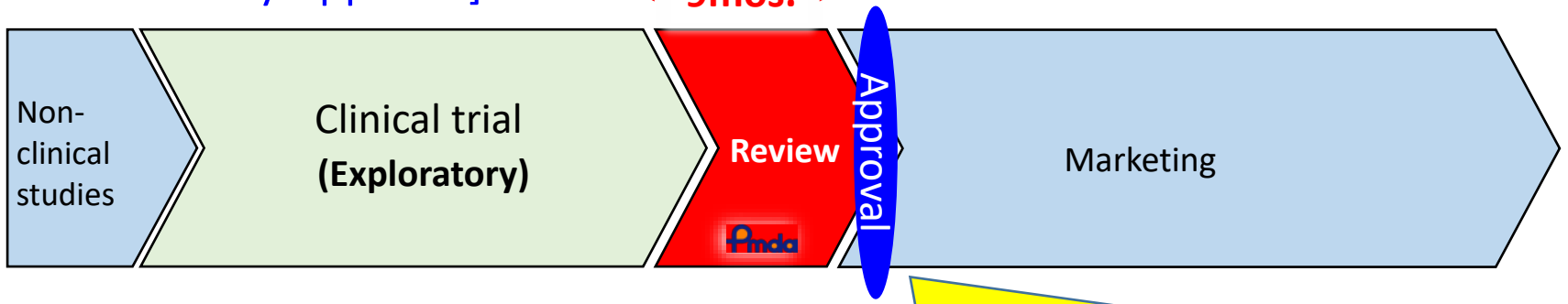


# R&D process for Conditional Early Approval (CEA)

[Standard]




[Conditional Early Approval]




Examples of the conditions for approval:

- Conduct post-marketing surveys/other studies to re-confirm the efficacy and
- Take necessary measures for proper use of the product

# Post-marketing surveillance for *SAKIGAKE* / CEA drugs

Careful to watch for unexpected, serious ADRs in the post-marketing phase

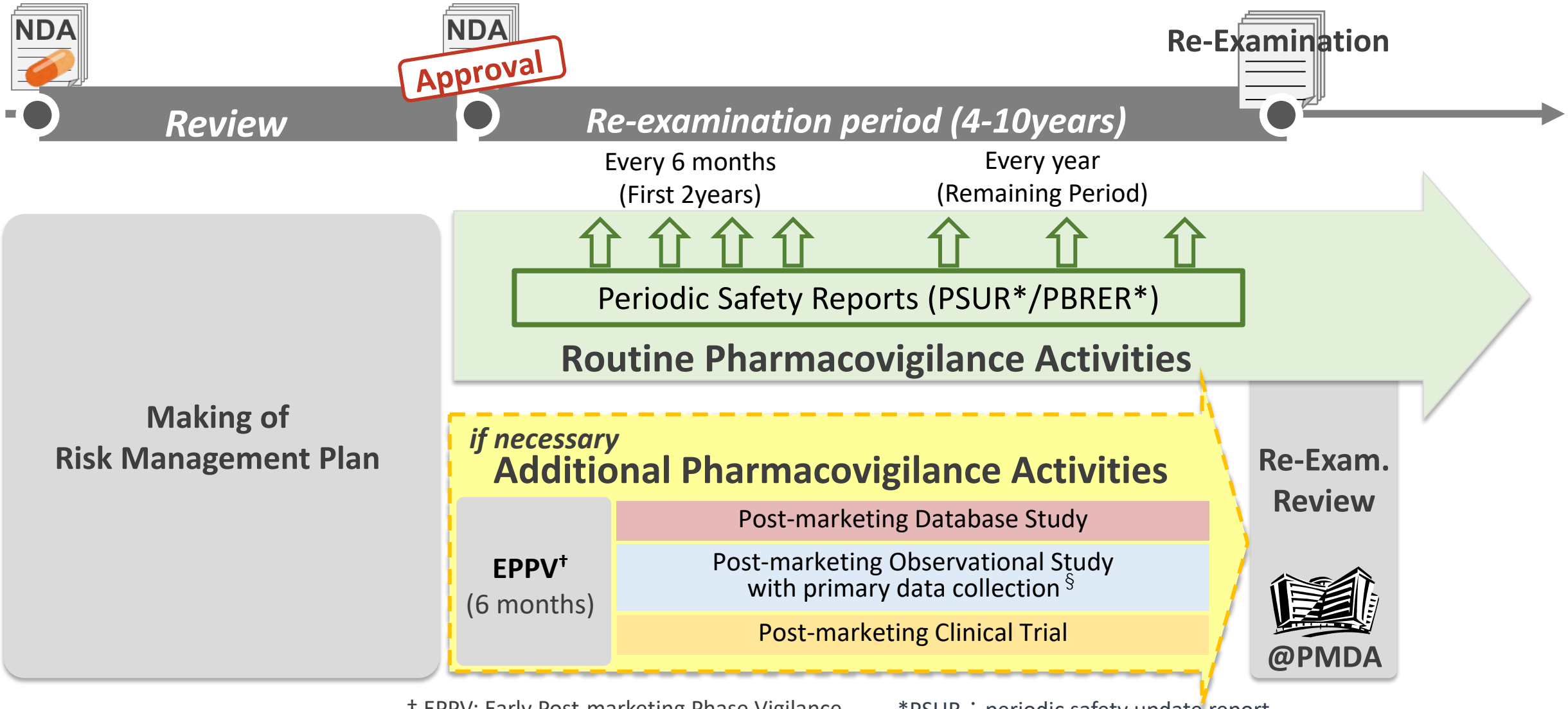
**Approval Conditions Example**

1. The applicant is required to develop and appropriately implement a risk management plan

Reason!

2. Because data from Japanese clinical studies are extremely limited, the applicant is required to conduct a post-marketing use-results survey covering all patients treated with the product to keep track of information on patient characteristics until data from a specified number of patients have been collected. Furthermore, data on the safety and efficacy of the product should be collected as soon as possible, and measures to ensure proper use of the product should also be taken

# Regulatory requirements in post-marketing phase




† EPPV: Early Post-marketing Phase Vigilance
§ known as “drug use-results survey”

*PSUR：periodic safety update report,
PBRER：periodic benefit-risk evaluation report

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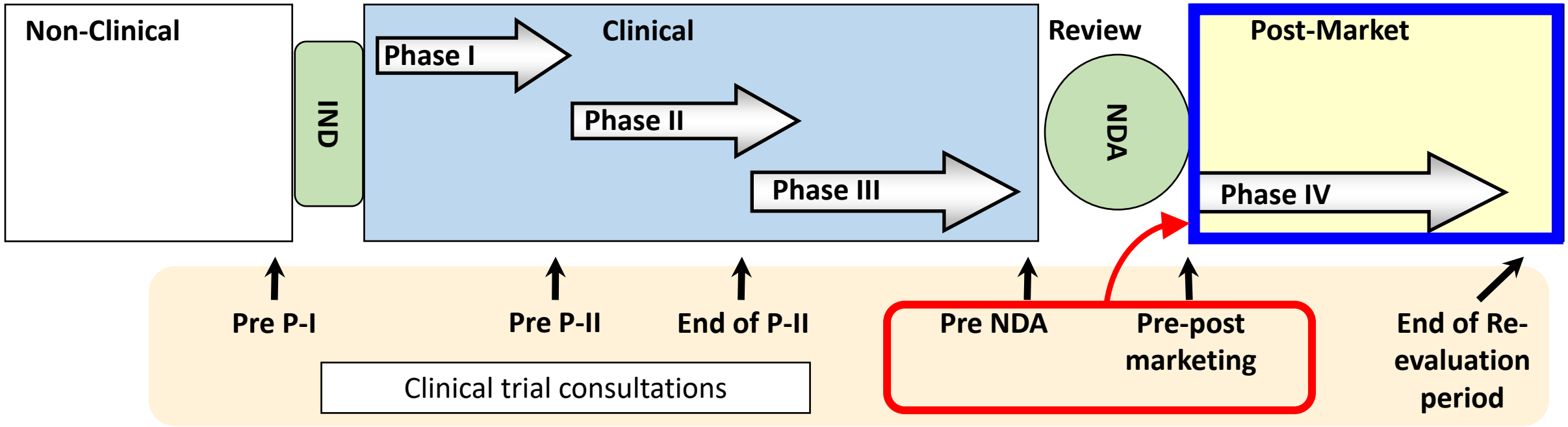
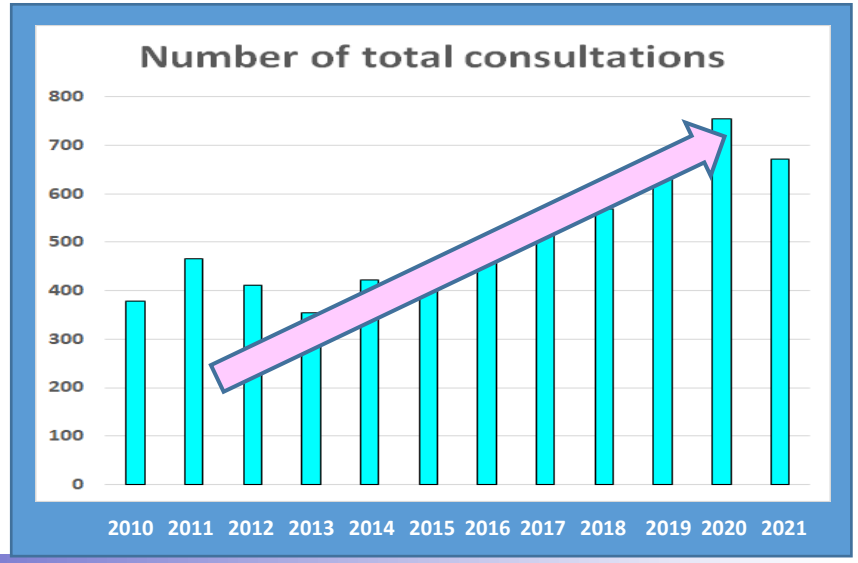
# Scientific Consultations & Drug Development Stage




Modified from Figure by Ichimaru K et al, *Clin Pharmacol Therapeut*, 88: 454-457, 2010

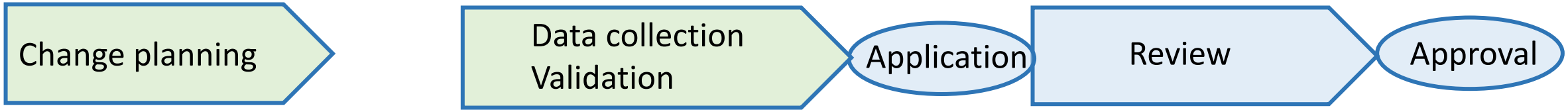



Source: '2021 PMDA Business achievement for the fiscal year'

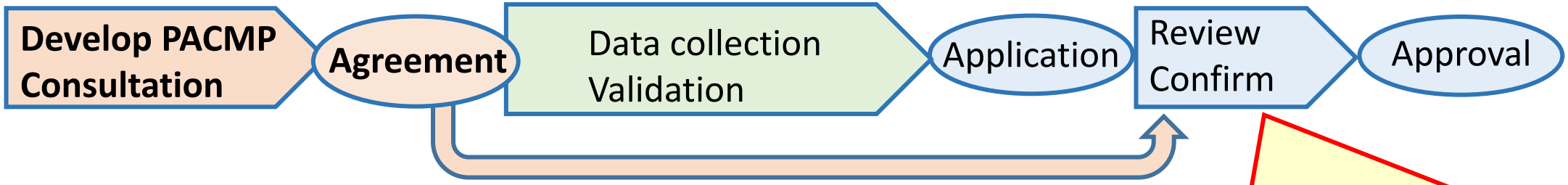
# Post-Approval Change Management Protocol (PACMP)

## Conventional change procedure

Proceed **after all data are collected**

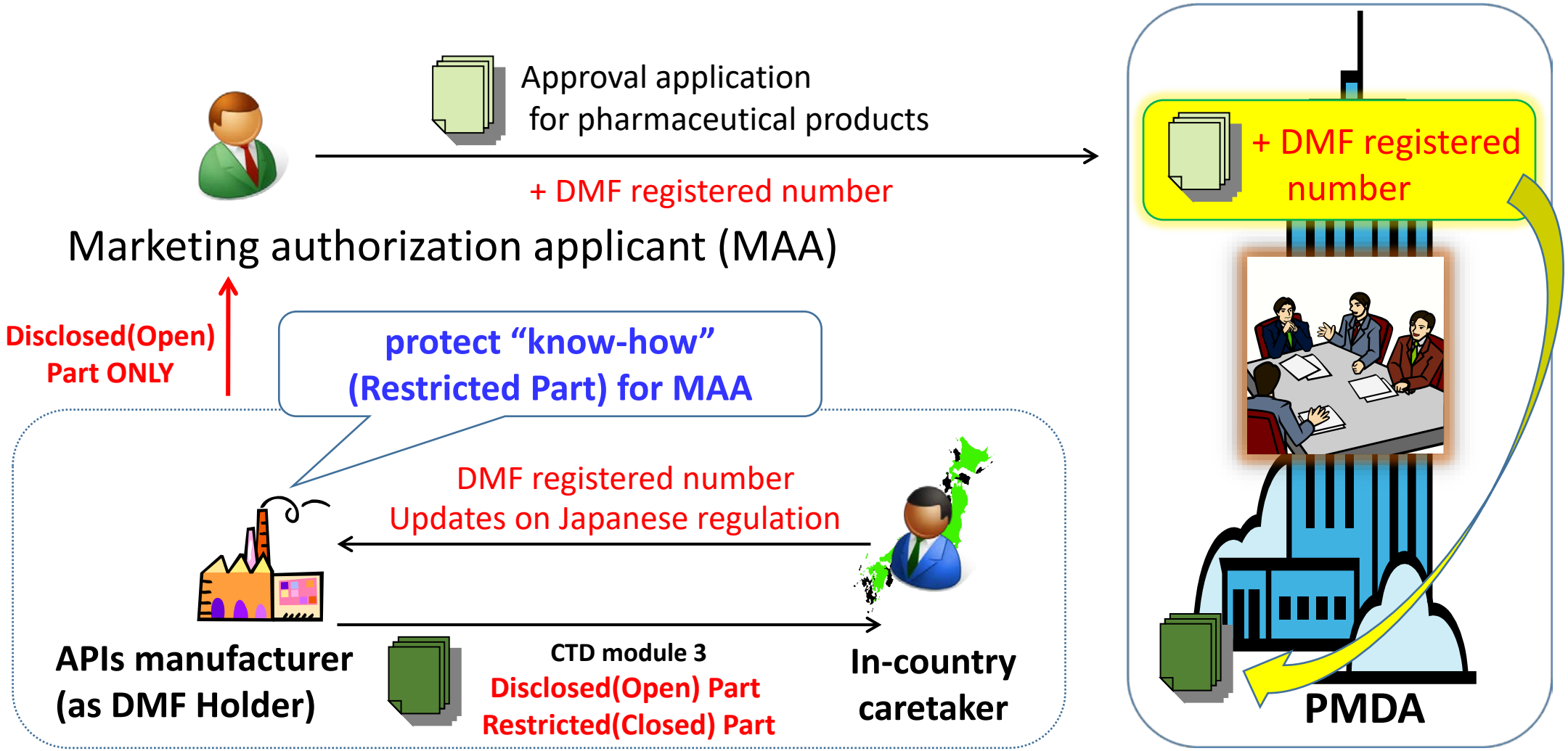



## Change procedure based on PACMP




**Short time Review** and confirm is enabled by ascertaining whether **prior agreement** and/or the expected results have been obtained

# Utilizing Drug Master File System in Review Process



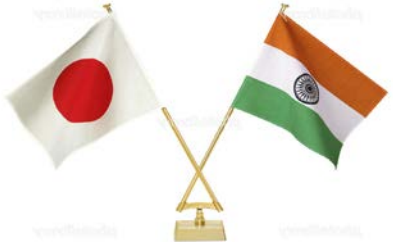
# Remote GMP Inspections

- Since 2020 - Traveling overseas has been strictly limited due to the COVID-19 pandemic.
- On-site inspections at foreign manufacturing sites have not been conducted.
- It is difficult to predict the future international situation. There is a concern that on-site inspections at foreign manufacturing sites may not be conducted for an extended period of time.

PMDA mainly conducts (advanced) desktop inspections or postponed on-site inspections. Since it is difficult to understand the actual situation of the manufacturing sites only by desktop inspections, a new method of inspection needs to be developed to thoroughly examine the manufacturing sites with higher risks.

As a more effective means of inspection compared to the conventional desktop inspections, PMDA started the examination and operation of "Remote Inspection with ICT Tool."

# Promote Fast Patient Access



Accelerated Regulatory Pathways

Efficient Review Processes

## Thank you for your attention!