



独立行政法人 医薬品医療機器総合機構
Pharmaceuticals and Medical Devices Agency

Regulatory Update of Regenerative Medicine in Japan

Yoshiaki Maruyama, Ph.D.

Director

Office of Cellular and Tissue-based Products

Pharmaceuticals and Medical Devices Agency (PMDA), Japan

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7th India-Japan Medical Products Regulatory Symposium

Outline

- The Act on the Safety of Regenerative Medicine
- The Act on Pharmaceuticals and Medical Devices

Dual Regulation of Regenerative Medicine in Japan

Technology & Product

Regenerative Medicine

Enacted on
25 November 2014

All medical **technologies** using processed cells which safety and efficacy have not yet been established



Safety
Act

The Act on the Safety of
Regenerative Medicine

Medical Care or
Academic Research Purpose

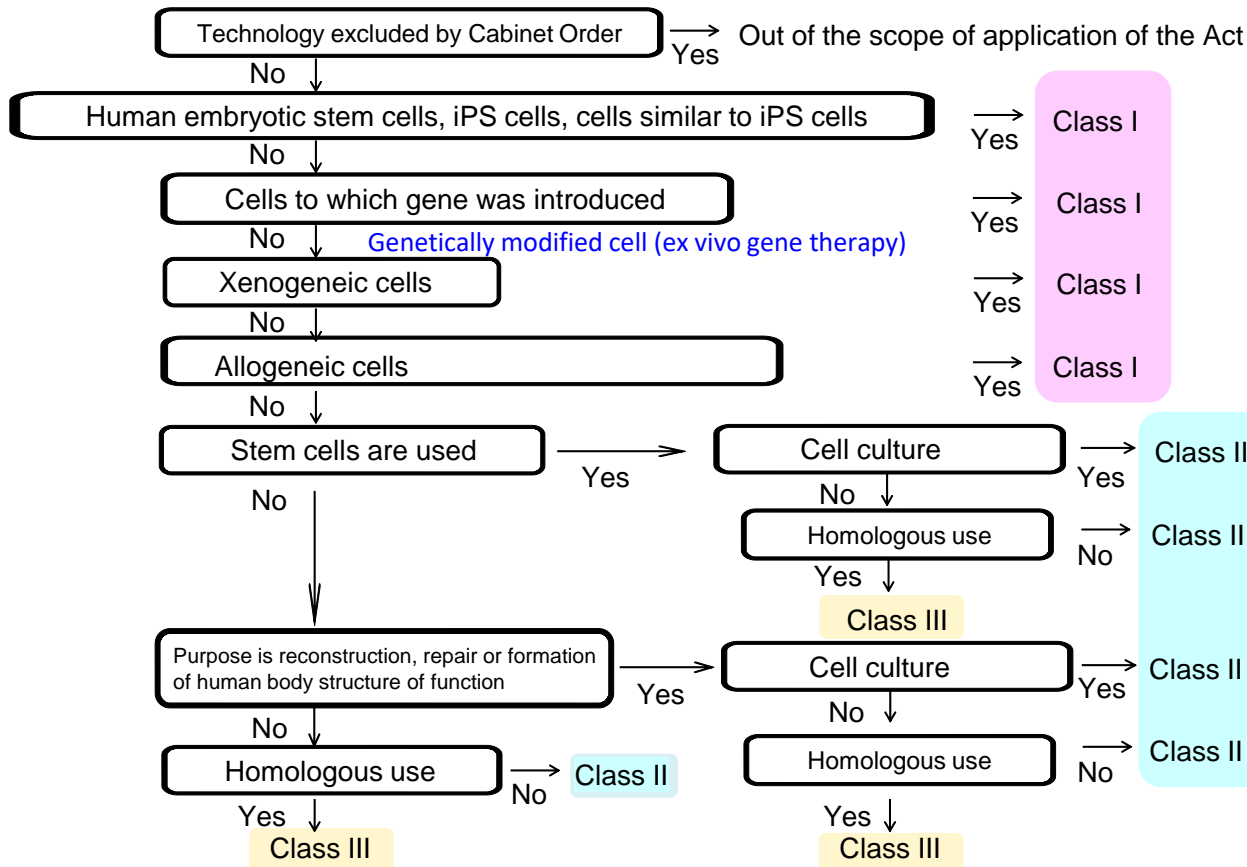
Production and marketing of regenerative and cellular therapeutic **products** by firms



The Act on Pharmaceuticals and
Medical Devices

PMD
Act

Commercial Product
Marketing Authorization Purpose



| Class | Medical Care | Clinical Research |
|---------------------|--------------|-------------------|
| I (High risk) | 7 | 16 |
| II (Middle risk) | 1,571 | 43 |
| III (Low risk) | 3,898 | 42 |

(As of 1 December 2023)

Current Activity

WG has been established to review the Safety act, and studies are being conducted.
in vivo gene therapy is currently out of scope. *in vivo* gene therapy is also under consideration for inclusion in the scope of Safety act.

iPS cells

| Health Condition(s) or Problem(s) Studied | Hospital/Clinic | Trial ID |
|---|--|----------------------------------|
| Aplastic anemia with platelet transfusion refractoriness due to anti-platelet alloantibody | Kyoto University Hospital | jRCTa050190117 |
| Bullous keratopathy | Keio University | jRCTa031210199 |
| Damage of articular cartilage of the Knee | Kyoto University Hospital Osaka University Graduate School of Medicine | jRCTa050190104 |
| Limbal stem-cell deficiency | Chiba University Hospital | jRCTa050190084 |
| Recurrent or advanced head and neck cancer | Kobe City Eye Hospital | jRCTa030220741 |
| Retinitis pigmentosa | Kobe City Eye Hospital | jRCTa050200027 |
| RPE impaired disease | Keio University School of Medicine | jRCTa050210178 jRCTa050200122 |
| Severe heart failure patients with NYHA class III or higher (HFrEF by dilated cardiomyopathy) | Keio University School of Medicine | jRCTa032200189 |
| Spinal cord injury at subacute stage | Keio University School of Medicine | jRCTa031190228 |

Autologous cells to which gene was introduced

| Health Condition(s) or Problem(s) Studied | Hospital/Clinic | Trial ID |
|--|--|----------------|
| CD19 positive acute lymphoblastic leukemia | Nagoya University Graduate School of Medicine | jRCTa040190099 |
| Familial LCAT deficiency | Chiba university | jRCTa030190230 |

Allogeneic cells

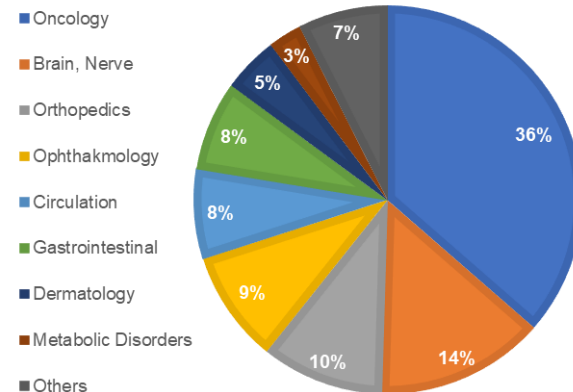
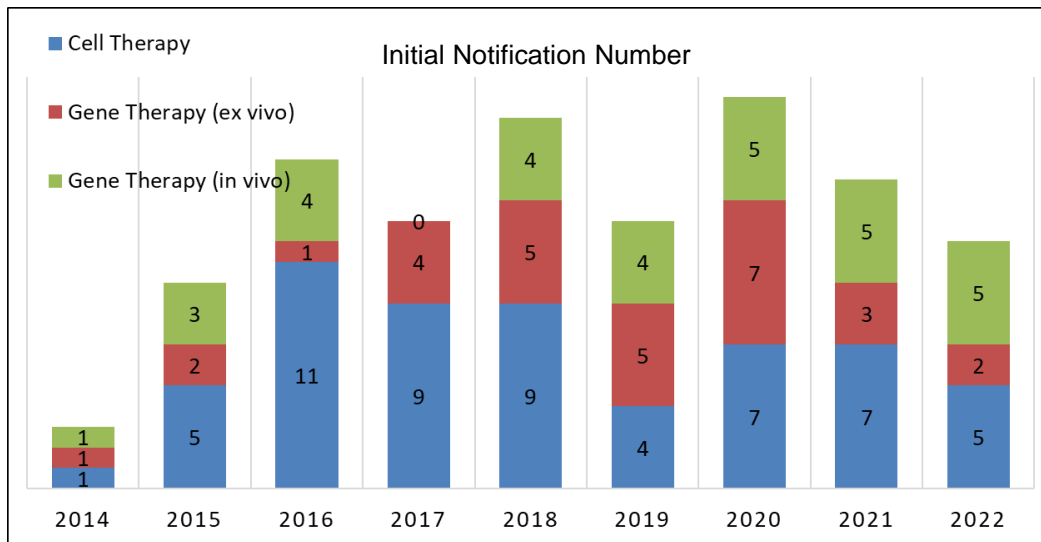
| Health Condition(s) or Problem(s) Studied | Hospital/Clinic | Trial ID |
|--|---|----------------------------------|
| Bullous keratopathy | Kyoto Prefectural University of Medicine | jRCTa050190118 |
| Cartilage defects associated with osteoarthritis of the knee | Tokai University | jRCTa030190242 |
| Cerebral palsy | Kochi Medical School Hospital | jRCTa060200017 jRCTa060200018 |
| Decompensated liver cirrhosis patients who will receive liver transplantation | Hiroshima University | jRCTa060190036 jRCTa030230316 |
| EBV associated lymphoproliferative disorder after allogeneic stem cell transplantation | Nagoya University Graduate School of Medicine | jRCTa040190110 |
| Hematological disorders applicable to cord blood transplantation | Aichi Medical University | jRCTa040190133 |
| Idiopathic peripheral ulcer and cGVHD related corneal ulcer | Keio University | jRCTa030220167 |
| Insulin-dependent diabetes mellitus | Shinshu University School of Medicine | jRCTa030190164 |
| Persistent viral infection after hematopoietic cell transplantation | Tokyo Medical and Dental University | jRCTa030190229 |
| Refractory chronic skin ulcer | Keio University School of Medicine | jRCTa030200053 |
| Refractory cutaneous ulcers | Research Institute for Radiation Biology and Medicine (RIRBM), Hiroshima University | jRCTa060210018 |

Source: <https://jrct.niph.go.jp/search>

Search condition: Clinical Research for Regenerative Medicine (Class I)

| Notification | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | Total |
|--------------------------|-------|--------|--------|---------|--------|--------|--------|--------|---------|----------|
| Initial | 3 [1] | 10 [2] | 16 [7] | 13 [8] | 18 [8] | 13 [7] | 19 [9] | 15 [7] | 12 [3] | 119 [51] |
| 2 nd or later | 1 [1] | 3 [2] | 5 [0] | 14 [10] | 17 [3] | 16 [7] | 22 [5] | 18 [9] | 25 [14] | 121 [51] |

Note: The table in brackets in parentheses indicate the number of notifications of “investigator-initiated clinical trials (IIT).”



Area of disease

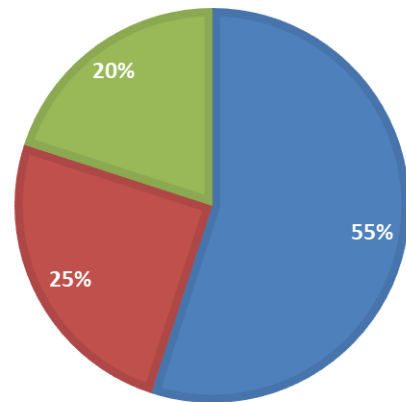
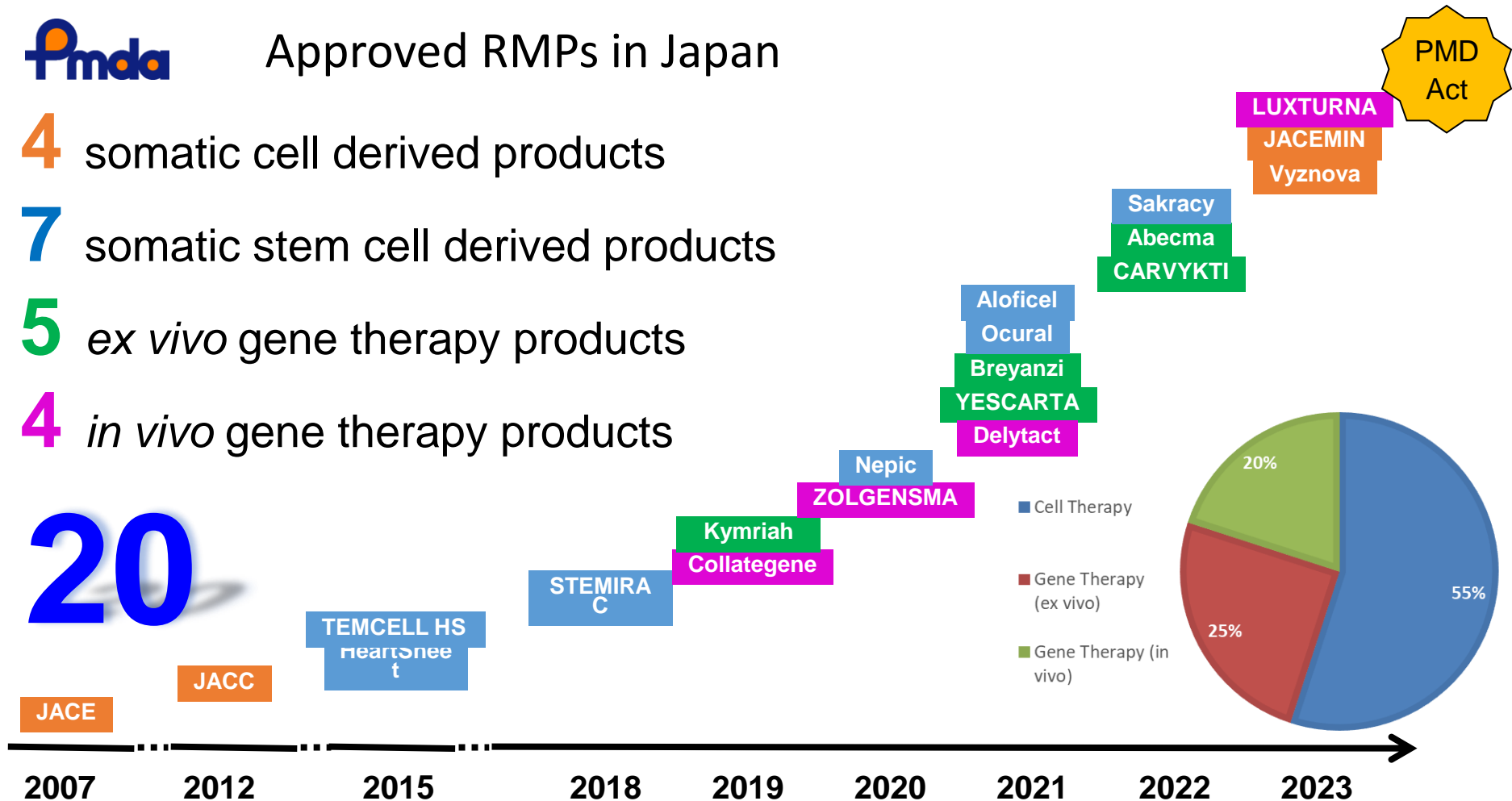
4 somatic cell derived products

7 somatic stem cell derived products

5 *ex vivo* gene therapy products

4 *in vivo* gene therapy products

20



| | Priority review (Orphan) | SAKIGAKE | Conditional & Time-limited Approval |
|-------------|--------------------------|----------|-------------------------------------|
| Abecma | ✓ | | |
| Breyanzi | ✓ | | |
| CARVYKTI | ✓ | | |
| Delytact | ✓ | ✓ | ✓ |
| Kymriah | ✓ | | |
| YESCARTA | ✓ | | |
| LUXTRNA | ✓ | | |
| Nepic | ✓ | | |
| Ocural | ✓ | | |
| Sakracy | ✓ | | |
| Vyznova | ✓ | | |
| STEMIRAC | | ✓ | ✓ |
| ZOLGENSMA | ✓ | ✓ | |
| Collategene | | | ✓ |
| HeartSheet | | | ✓ |
| JACE | ✓GCMN*, EB** | | |
| JACEMIN | | | |
| Aloficel | ✓ | | |
| JACC | | | |
| TEMCELL | ✓ | | |

Area of disease # of products

Oncology 6

Ophthalmology 5

Brain, Nerve 2

Circulation 2

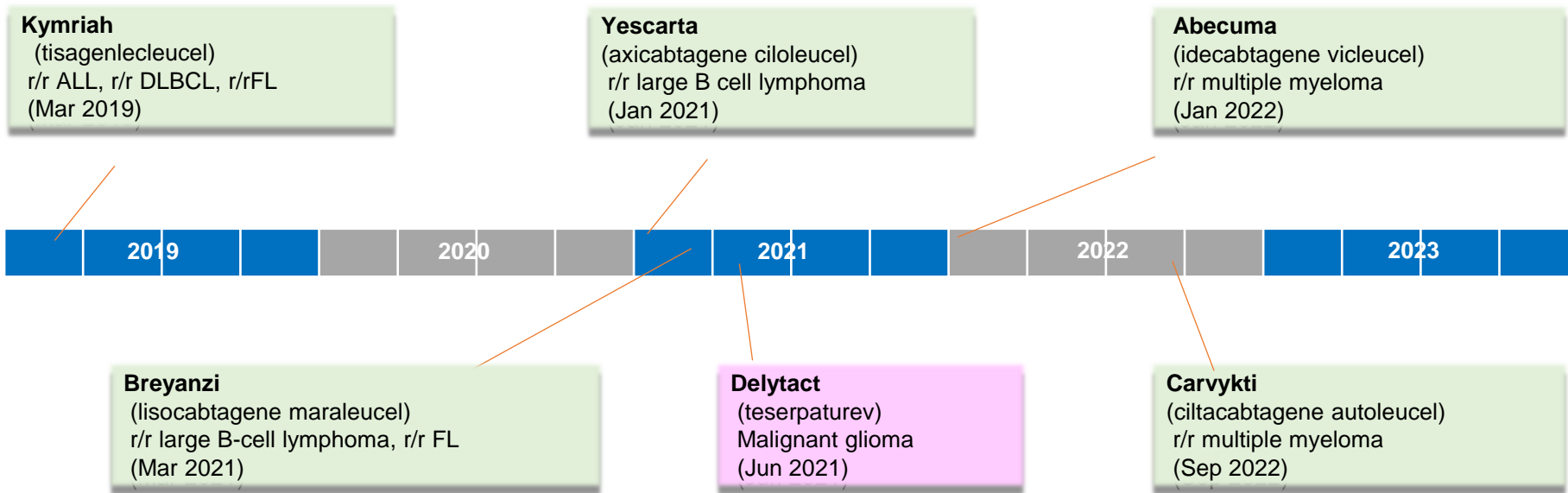
Dermatology 2

Others 3

The target review time
Priority products: 9 month
Regular products: 12 month

*GCMN: Giant congenital melanocytic nevi

**EB: Dystrophic epidermolysis bullosa



Oncolytic Virus



<https://www.jppte.co.jp/business/regenerative/>

Nepic

(Human (autologous) corneal limbus-derived corneal epithelial cell sheet)
(Mar 2020)

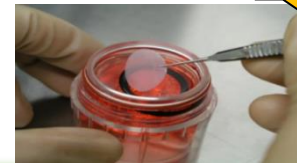
Epithelial cell sheet for limbal stem cell deficiency (LSCD),
a rare and intractable corneal epithelial disease



<https://www.jppte.co.jp/business/regenerative/>

Ocural

(Human (autologous) oral mucosa-derived epithelial cell sheet)
(Jun 2021)



http://hirosaki-li.co.jp/products_sakracy.html

Sakracy

(Human (autologous) oral mucosa-derived epithelial cell sheet using human amniotic membrane substrate)
(Jan 2022)



Aketa et al., The Ocular Surface. 29, 220-225 (2023)

Vyznova

(Human (allogenic) corneal endothelium-derived endothelial cell injection)
(Mar 2023)

LUXTURNA

(voretigene neparvovec)
Confirmed biallelic RPE65
Mutation-associated retinal dystrophy
(Jun 2023)

Endothelial cell injection for Bullous Keratopathy,
a rare and intractable corneal endothelial disease

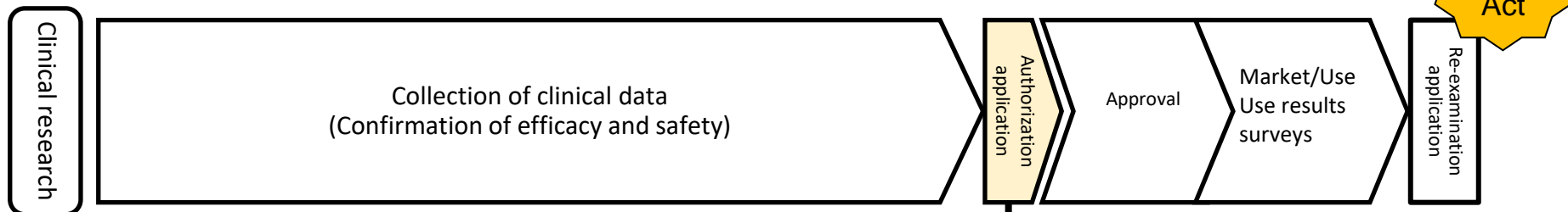
Adeno-associated virus (AAV) vector

Summary of Approved RMPs in Japan

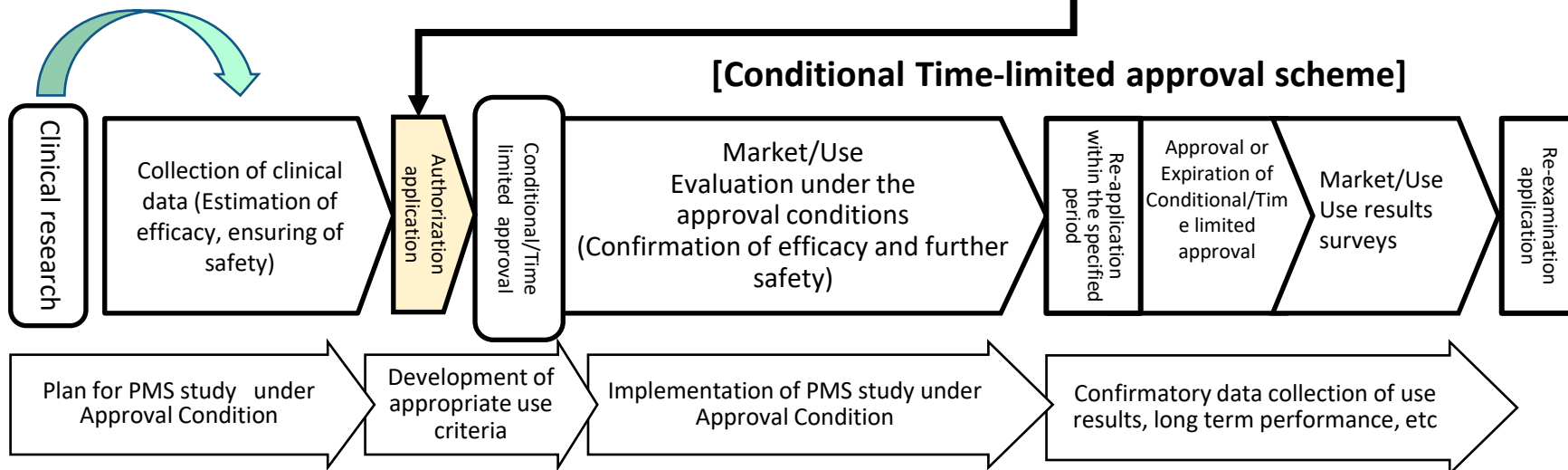
| | Japan Origin (12) | Global (8) |
|--|--|--|
| Cell Therapy Products (16) | | |
| Somatic cell derived products (9) | JACE (Skin) JACC (Knee) JACEMIN (Skin) Vyznova (Eye) | Kymriah YESCARTA Breyanzi Amecma CARVYKTI CAR-T |
| Somatic stem cell derived products (7) | HeartSheet* TEMCELL HS STEMIRAC* Nepic (Eye) Ocural (Eye) Sakracy (Eye) | Aloficel |
| iPS cell derived products (0) | --- | --- |
| Embryonic stem cell derived products (0) | --- | --- |
| Gene Therapy Products (4) | | |
| Plasmid vector products (1) | Collategene* | --- |
| Viral vector products (2) | --- | ZOLGENSMA LUXTURN A AAV |
| Others (1) | Delytact* | |

*Conditional and Time limited Approval

[Conventional approval scheme]



[Conditional Time-limited approval scheme]



Plan for PMS study under Approval Condition

Development of appropriate use criteria

Implementation of PMS study under Approval Condition

Confirmatory data collection of use results, long term performance, etc

Outline of the Condition for Approval and Granted Time-period for PMS Study

| Products | HeartSheet | Stemirac | Collategene | Delytact |
|----------------------------|--|---|--|---|
| | Treatment of patients with severe heart failure due to ischemic heart disease unresponsive to standard | Spinal cord injure | The treatment of ulcers in patients with chronic arterial occlusion | Malignant glioma |
| Granted time-period | 8 years (17/09/2023) (Extend on 20/11/2018 after hearing the opinion of the Pharmaceutical Affairs and Food Sanitation Council) | 7 years (27/12/2025) | 5 years (25/03/2024) | 7 years (10/06/2028) |
| Efficacy evaluation | | | | |
| Primary endpoint | Time to cardiac death (at ≥ 2 years post transplantation) | <p>Cohort I; Patients with AIS Grade A at 6 to 8 weeks (49 ± 7 days) after injury Percentage of patients achieving ≥ 2 grade improvement in AIS at 180 ± 30 days from 6 to 8 weeks (49 ± 7 days) after injury</p> <p>Cohort II; Patients with AIS Grade B or C at 6 to 8 weeks (49 ± 7 days) after injury Percentage of patients with AIS Grade B or C achieving ≥ 1 grade improvement in AIS at 180 ± 30 days from 6 to 8 weeks (49 ± 7 days) after injury</p> | The proportion of patients with completely closed ulcer at 12 week later after injection | OS (from the day of diagnosis of malignant glioma to death [from any cause]): For each population of patients with primary glioblastoma and patients with recurrent glioblastoma, conduct a trend score matching so that the Delytact and control groups include the same number of patients (1:1), and perform a log-rank test with the two-sided significance level of 5% on OS in the sample population. |
| Number of subject | | | | |
| Product | 60 | Cohort I; 27 Cohort II; 63 | 120 | Glioblastoma: 250 Grade III malignant glioma: 60 to 100 |
| Control (External) | 120 | Cohort I; 54 Cohort II; 125 | 80 | Glioblastoma: 500 Grade III malignant glioma: 120 to 200 |

- Discussion of acceptable level of clinical effectiveness vs. patient access to the new therapy.
- Weighing acceptable risk against expected benefit.



- Considerations for Conditional and Time-limited Approval of Cell and Gene Therapy Products, PSEHB/MDED Notification No. 0329-3, 2024.

<https://www.pmda.go.jp/files/000267914.pdf>

- Guidance on Conditional and Time-limited Approval and Protocol for Post Marketing Study of Stem Cell Therapy Products, PSEHB/MDED Notification No. 0329-4, 2024.

<https://www.pmda.go.jp/files/000267915.pdf>

Nobel Prize in Physiology or Medicine 2012
"Induced pluripotent stem cell (iPSCs)"

- Current Perspective on Evaluation of **Tumorigenicity** of **Cellular and Tissue-based Products** Derived from induced Pluripotent Stem Cells (iPSCs)* and iPSCs as Their Starting Materials (20 August 2013)

- Proposal on Basic Principle to **Quality Assurance** of **Cell Therapy (CT) Products** (14 June, 2015)

CAR-T for blood cancers (2017-)

(PMDA Science Board has started the discussion on gene editing (2018))

- Points to Consider for Ensuring **Quality and Safety** of **Gene Therapy Products** (9 July, 2019)

Nobel Prize in Chemistry 2020
"Crispr-Cas9"

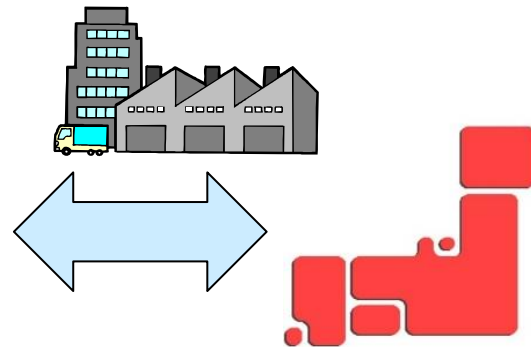
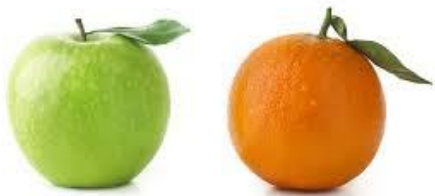
- Report on Considerations on **Quality and Safety** of **Gene Therapy Products** Using Genome Editing Technology (7 February, 2020)

(Discussion on vectors with targeting function has begun(2023))

- Points to Consider for **Development** of **in vivo Gene Therapy Products** with Target Specific Viral/non-Viral Vector
(To be publish in 2024)

<https://www.pmda.go.jp/english/rs-sb-std/sb/subcommittees/0031.html>

Comparability



- Comparability of Cell Therapy Products Subject to Changes in Their Manufacturing Process PSEHB/MDED Notification No. 0329-1, 2024.

<https://www.pmda.go.jp/files/000267916.pdf>

Summary

- Medical technologies using processed cells are active under the Safety Act.
- 20 RMPs, including 5 *ex vivo* and 4 *in vivo* gene therapy products, have been approved under the PMD Act.
- 4 of 20 RMPs have been approved through comprehensive framework for patient access (conditional and time-limited approval scheme).

Sponsors are subject to strict PMS study to prepare re-marketing authorization submission within the granted time-period.

- According to R&D trends, the GLs related to RMPs development have been prepared.

Regenerative Medical Products

1. Regulatory Framework

Regenerative medicine, which is expected to overcome intractable and serious diseases, is expected to play an important role in conventional medicine worldwide. The Japanese government must implement comprehensive policies to promote the development of regenerative medicine, inform the public, and increase public acceptance, and ensure that medical professionals and investigators cooperate with the policies. In this background, two regulatory frameworks for regenerative medicine, “[The Act on the Safety of Regenerative Medicine](#)” (ASRM) and the “[Pharmaceuticals, Medical Devices, and Other Therapeutic Products Act](#)” (PMD Act), came into effect in November 2014. The ASRM sets out legal regulations not only for research, but also for the daily medical practice of cell therapy, which had previously been under the jurisdiction of the [Medical Practitioners' Act](#) and the [Medical Care Act](#).





The PMD Act regulates the commercialization of regenerative medical products. Regenerative medical products in the PMD Act are defined as:

- a. Processed (more than minimal manipulation) live human/animal cells that are intended to be used for either
 - reconstruction, repair, or formation of structures or functions of the human body







Review Reports: Regenerative Medical Products

A

| Brand Name | Non-proprietary Name | Approved In | English | Japanese |
|------------|------------------------|----------------|---|---|
| Abecma | idecabtagene vicleucel | January 2022 |  |  |
| Alofisel | darvadstrocel | September 2021 |  |  |

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B

| Brand Name | Non-proprietary Name | Approved In | English | Japanese |
|-------------------------------------|--------------------------|---------------|---|---|
| Breyanzi Initial Approval | lisocabtagene maraleucel | March 2021 |  |  |
| Breyanzi Partial Change Approval | lisocabtagene maraleucel | December 2022 |  |  |

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- Maruyama Y, Noda S, Okudaira S, Sakurai A, Okura N, Honda F. Regulatory Aspects of Cell and Gene Therapy Products: The Japanese Perspective, Adv Exp Med Biol, 1430, 155-179 (2023)
https://doi.org/10.1007/978-3-031-34567-8_9
- Maruyama Y, Sakurai A, Noda S, Fujiwara Y, Okura N, Takagi T, Asano J, Honda F. Regulatory Issues: PMDA Review of Sakigake Designation Products: Oncolytic virus therapy with Delytact Injection (teserpaturev) for malignant glioma, The Oncologist, 28(8) 664-670 (2023)
<https://doi.org/10.1093/oncolo/oyad041>
- Aketa N, Kasai M, Noda S, Asano J, Kunieda A, Kawanishi S, Maruyama Y, Honda F. Insights Into the Clinical Development of Regenerative Medical Products Through a Comparison of Three Cell-based Products Recently Approved for Limbal Stem Cell Deficiency. The Ocular Surface, 29, 220-225 (2023)
<https://doi.org/10.1016/j.jtos.2023.05.008>
- Sakurai A, Kanzaki S, Honda F. Japanese pharmaceutical regulations of engineered viral vectors for medical use compared with those in the US and EU. Clinical Pharmacology & Therapeutics (2023)
<https://doi.org/10.1002/cpt.2788>
- Fujiwara Y, Maruyama Y, Honda F. Balancing safety and efficacy with early availability in the regulation of regenerative medicine product. Clin Pharmacol Ther, 109:1182-1185 (2021).
<https://doi.org/10.1002/cpt.2034>

Thank you for your attention!

Please visit the PMDA website

<http://www.pmda.go.jp>

<http://www.pmda.go.jp/english/index.html>

