

Clinical Trial Regulation: Implementation tasks for the European Commission



CTR: a new legal framework **CTR CTD** National specificities for part II Harmonisation for part I

European Commission

Delegated and implementing acts

- <u>Implementing Regulation (EU) 2017/556 of 24 March 2017</u> on detailed arrangements for the good clinical practice inspection procedure
- Commission Delegated Regulation (EU) 2017/1569 specifies principles and guidelines for good manufacturing praction for investigational medicinal products and arrangements for inspecific
- Commission Implementing Review (EU) 2022/20 setting up the rules and procedures for the coop (attack) he Member States in safety assessment of clinical trials, became applicate on 31/1/2022.
- Commission Delegated Regulation (EU) 2022/2239 as regards labelling requirements for unauthorised investigational medicinal products



Guidance on the CTR application: the Q&A document

- Under EUDRALEX Volume 10 The rules governing medicinal products in the European Union
- Version 6.4, CTEG consulted, CTAG endorsed.
 - Annex II: Language requirements for part I documents
 - Annex III: Part II documentation where sponsors can find national requirements
- Size:
 - 127 pages, 162 with annexes
 - 527 paragraphs
 - 12 chapters



National competent authorities, ethics committee EMA (CTIS helpdesk, Product Ownner Expert Group, ACT EU)

Escalate if horizontal issue

CTCG
Best practices
Roundtable of assessors

Escale if not solved by best practices

CTAG / CTEG

Amend Q&A

From the CTR provision to CTIS functionality

REGULATION (EU) No 536/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 16 April 2014

on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC

(Text with EEA relevance)

CHAPTER I

GENERAL PROVISIONS

Article 1

Scope

This Regulation applies to all clinical trials conducted in the Union.

It does not apply to non-interventional studies.

Example:

CTR – Article 2

Definition of substantial modification

Article 2

Definitions

13) 'Substantial modification' means any change to any aspect of the clinical trial which is made after notification of a decision efferred to in Articles 8, 14, 19, 20 or 23 and which is likely to have a substantial impact on the safety or rights of the subjects or on the reliability and robustness of the data generated in the clinical trial;



Q&A – procedures and conditions

February 2023

The rules governing medicinal products in the European Union VOLUME 10 - Guidance documents applying to clinical trials

CLINICAL TRIALS REGULATION (EU) No 536/201

QUESTIONS & ANSWERS

VERSION 6

Submitted for discussion to the Expert the Clinical

updated at Trials and through written procedure to on and Advisory Group

SUBSTANTIAL MODIFICATIONS		
	3.1	Question. How is substantial modification" defined?
	3.2	Question: How are the different changes to ongoing clinical trials classified in the Clinical Trials Regulation?
	3.3	Question: What are the sponsor's responsibilities regarding changes to a clinical trial, which are not substantial modifications (SM), but are relevant for the supervision of the trial (Art. 81.9)?
	3.4	What are the sponsor's responsibilities regarding changes to a clinical trial which are non substantial modifications (NSM)?
	3.5	Question: When can a sponsor submit a substantial modification concerning Part I and II?
	3.6	Question: Is a sponsor allowed to submit a substantial modification concerning Part I in those Member States where an application was originally submitted for only Part I (limited application on the basis of article 11)?
	3.7.	Question: How should a sponsor proceed in case a substantial modification is required while the assessment of another application for the same clinical tria is ongoing (under evaluation)?
	3.8.	Question: How should a sponsor proceed when a substantial modification is related to a document common to various clinical trials of the same sponsor and same IMP?
	3.9.	How are MSC that have received a partial submission involved in the assessmen of part I substantial modifications?
	3.10	Question: Is the addition of an additional Member State considered a substantia modification?
	3.11.Question: Is the deletion of a Member State considered a substate modification?	
	3.12	Question: Is the annual safety report considered a substantial modification? 50
	3.13	Question: Is a change of the Principal Investigator considered a substantia modification?
	3.14	Question: Can a substantial modification of aspects covered by Parts I and II of the assessment report be partially authorised (e.g. only the Part II)?
	3.15	Question: can there be different decision of a part I SM in different MSc?5
	3.16	How should the change of the source country of an IMP or AxMP be implemented?

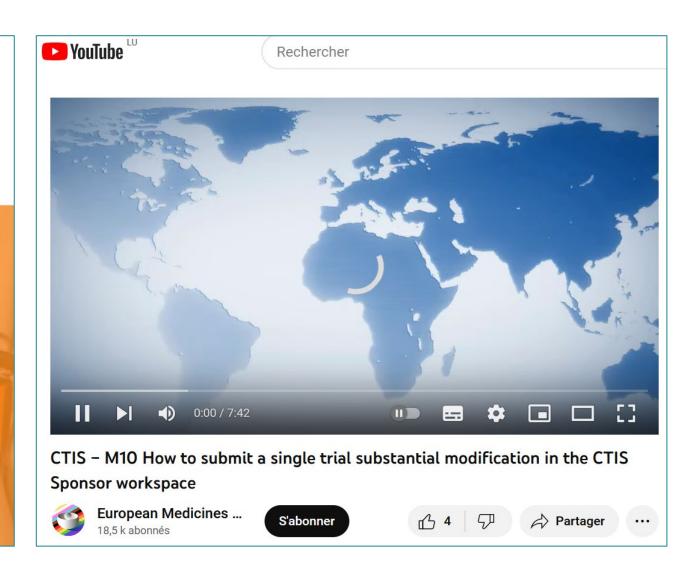
CTIS

EUROPEAN MEDICINES AGENCY SCIENCE MEDICINES HEALTH

Step-by-step guide

How to evaluate a Substantial Modification clinical trial application

CTIS Training Programme – Module 08 Version 1.1 – March 2022



Process CTR Q&A CTIS Change Delay new Q&A New function CTIS in CTIS



EU Survey on the implementation of the Clinical Trials Regulation







Survey on the implementation of the Clinical Trials Regulation – round 1

Survey run between 18 July and 9 September 2022 from commercial and noncommercial sponsors

CTIS: difficult to use, bugs, lack of functionalities

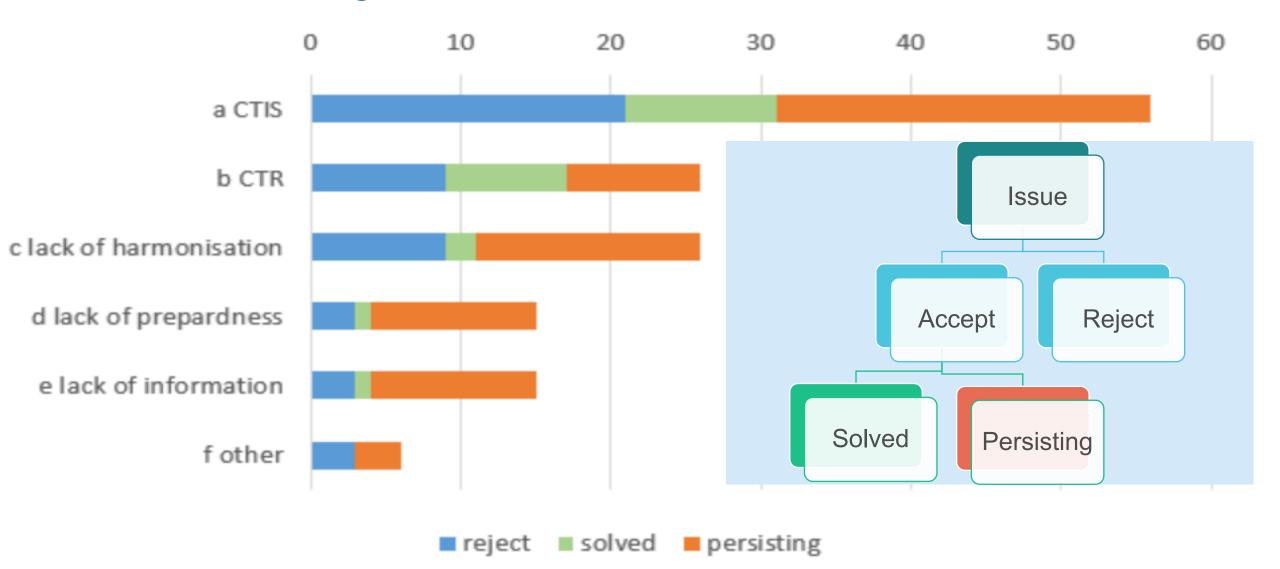
CTR: difficult to cope with the deadlines for RFIs, with new provisions on transparency

Lack of preparedness of certain MS: (use of CTIS, national legislation not yet aligned

Lack of harmonization: additional requirements out of the scope of the CTR, guidelines not followed

sion

Survey on the implementation of the CTR - Identification and screening of comments



Solutions provided by:

EMA - CTIS

- CTIS releases
- Guidance revision and production (Q&A on transparency)
- Revision of the rules on transparency

CTAG and CTEG

- Guidance revision and production (Q&A)
- List of web link to national contact for specific requirements
- Clarification of language requirements

CTCG

- Enhanced Member States coordination and cooperation
- Assessor roundtable, Ethics Committee forum
- Guidance revision and production (Best practices documents)

Commission / Member States

Commission structured dialogue with Member States to ensure full alignment of national rules with the CTR

Survey on the implementation of the Clinical Trials Regulation - second round

Objectives

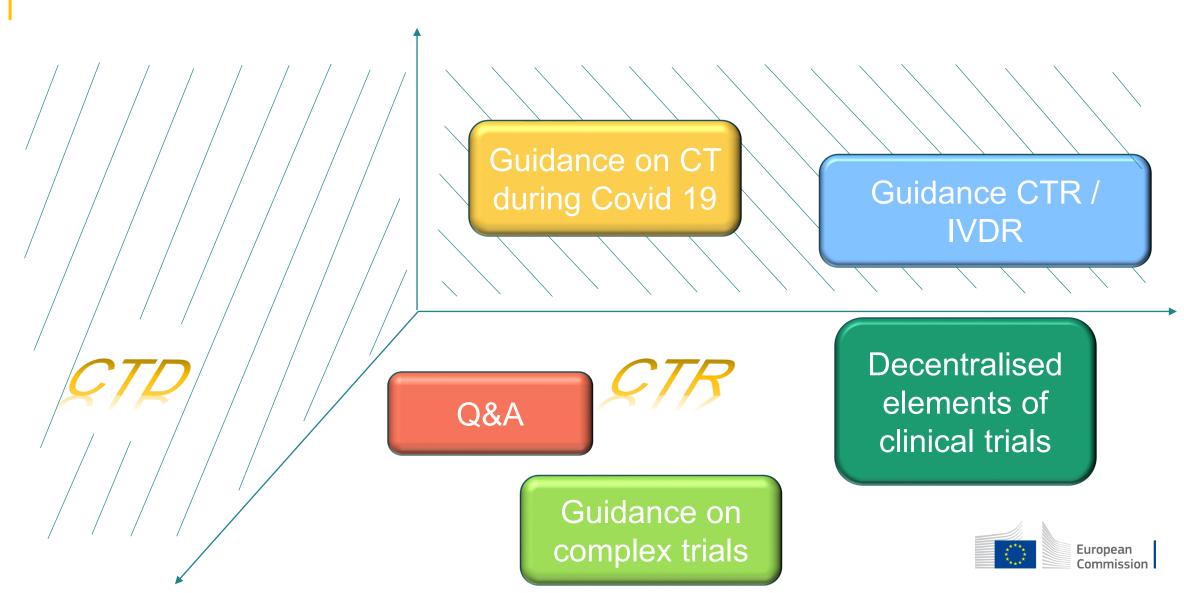
- To understand the remaining hurdles that hamper:
 - o a smooth **implementation** of the CTR
 - o a smooth transition of the clinical trials from EudraCT to CTIS
 - CTIS user friendliness
- To measure the **progress** achieved since the last survey

Deadline for responses: 30 September 2023

Duration: 3 weeks



CTR framework



THE LANCET

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Decentralised elements in clinical trials: recommendations from the European Medicines Regulatory Network

Monique Al • Solange Levison • Wolfgang E Berdel □ • Ditte Zerlang Andersen •

for the Decentralised Clinical Trials Task Force

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