Implementation of ICH GIs in Japan

- Improving regulations through harmonization-

ICH Regional Public Meeting
Oct. 21, 2008

Toshi Tominaga

FDA Fellow (MHLW)

E6: GCP

Japan's old GCP
- •Guidance without legal Ground
- •Subject's oral Consent allowed
- •Very weak Provisions on Monitoring/Auditing

ICH E6 EWG

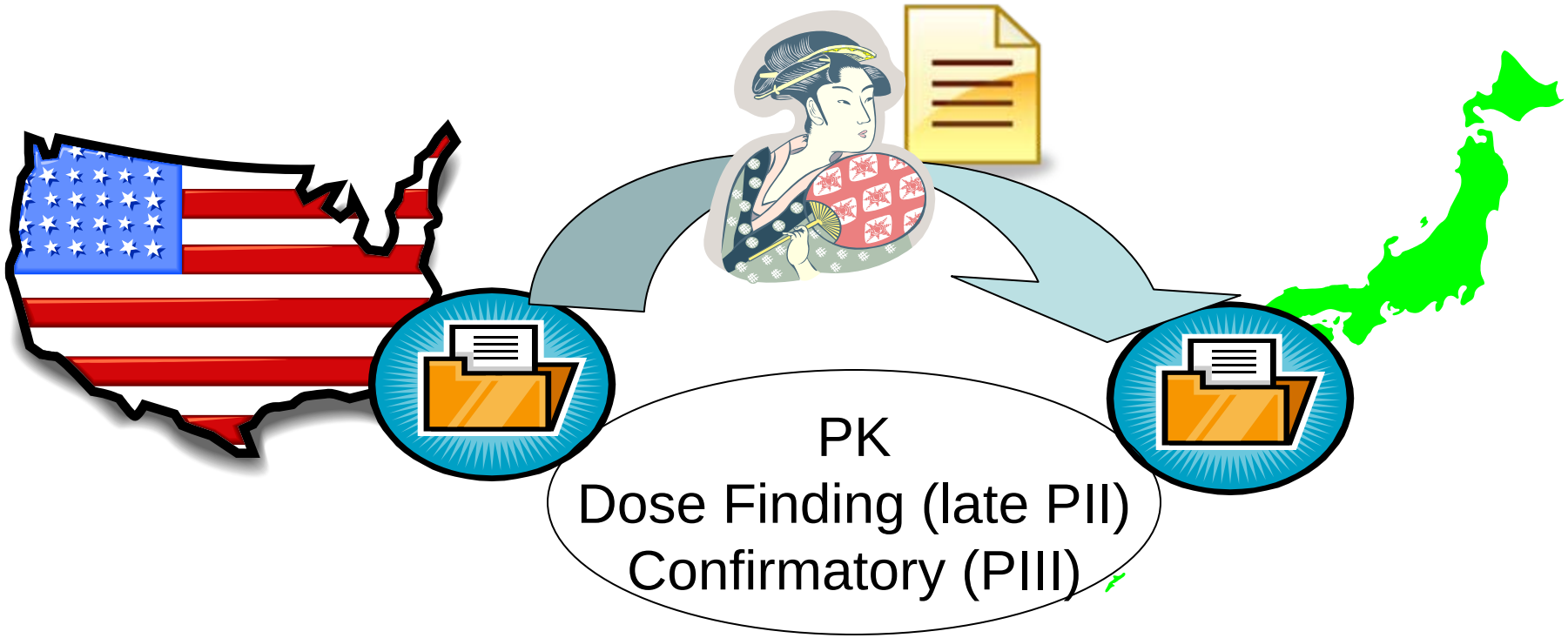
ICH GCP 1996 May

Japan's new GCP (effective 1997)
- •ICH-GCP fully compatible
- •Ministry Ordinance under Pharm. Affairs Law

Investigators' Comments THEN

- •"Written Consent is alien to Japanese Culture"
- •"You were beaten in negotiation by Westerners"
- •"How could we continue Clinical Trials??"

E5: Ethnic Factors in Acceptability of Foreign Clinical Data (Feb. 98)



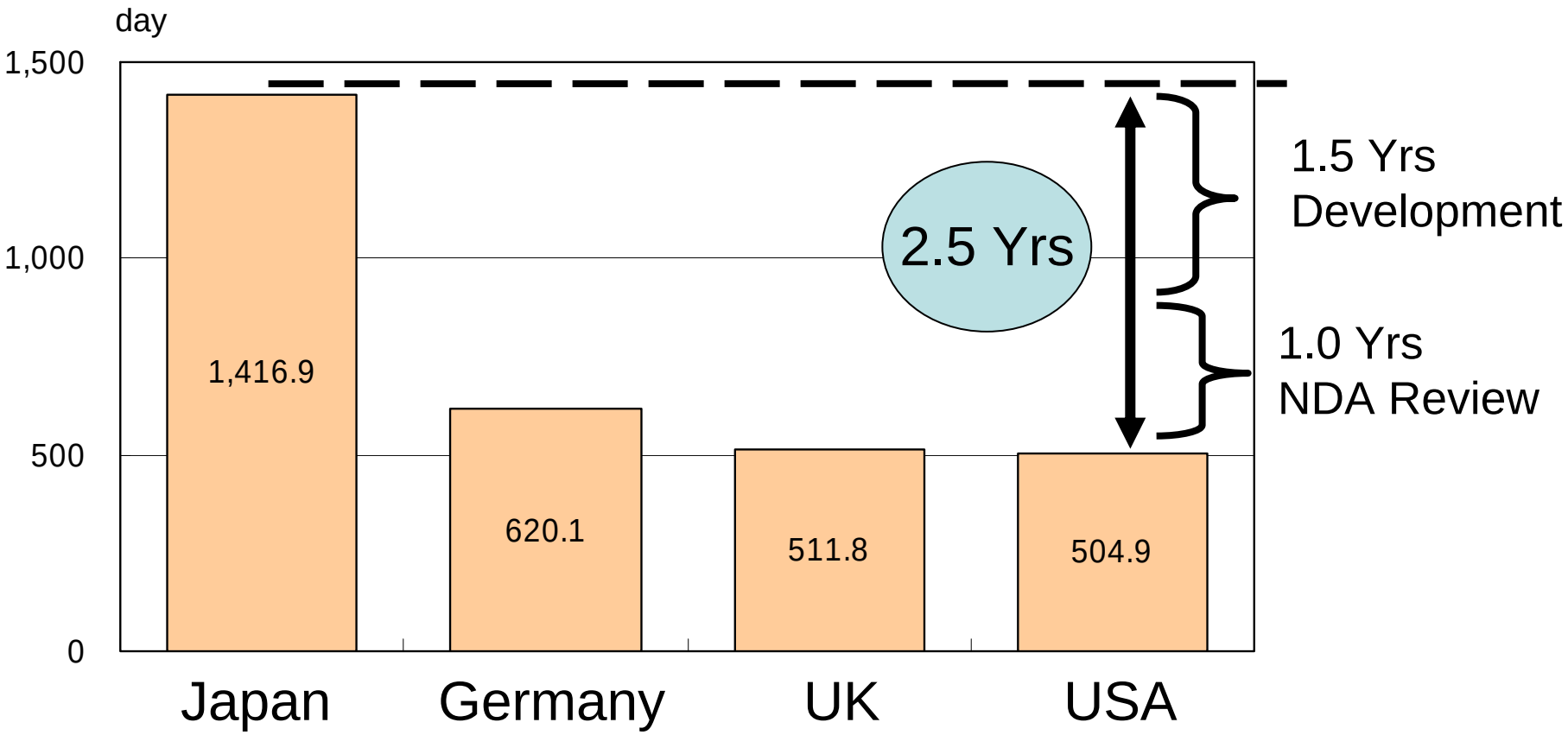
Concern
"Is one Study enough to assess Ethnic Factors?"

E5 implemented August '98

Mostly 1 Bridging Study

“Drug Lag”

Average Time between World’s 1st Approval and the Country’s Approval (88 Top Sellers) (2004)



Ref. JPMA Research Paper #31 (2006)

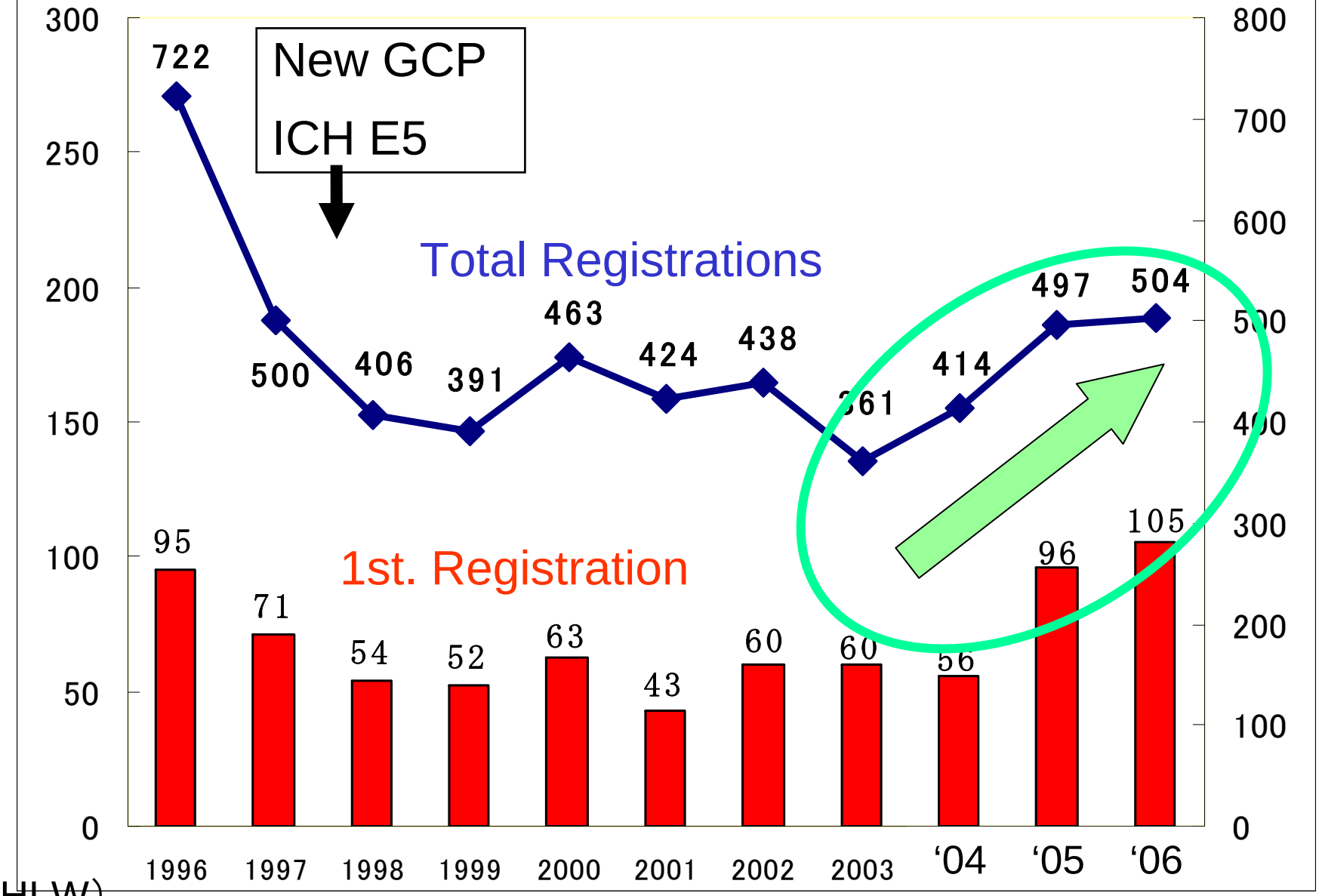
MHLW's Recent Idea/Move

- To eliminate drug lag, Japan's participation in multinational simultaneous trial (rather than bridging studies) is essential.
- Clinical Trial Environment needs Improvement
  - 5 Year Clinical Trial Activation Plan (2007-)
  - "Basic Principles on Global Clinical Trials (MHLW Sept.2007)
- Ethnic Factors need Scientific Research

Health Ministers' Joint Statement among China, Korea & Japan (April 8, 2007)

1. Pandemic Influenza
2. Other issues
   a. Clinical Researches
   b. Emergency Preparedness
   c. Traditional Medicines

of Japan's Clinical Trials



(MHLW)

New Quality Paradigm

MHLW

ICH

GMP Inspection AFTER Approval of Drugs

2002 Pharm. Affairs Law Amended

- More detailed description of Manuf. Process Required in the Application
- GMP Inspection/ Manuf. Process Assess became part of Application Review

Q8,9,10

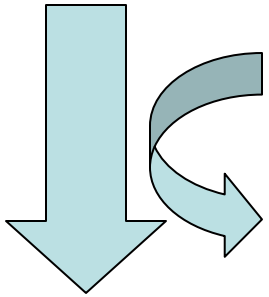
NOW Struggling in

- Reviewing,
- Post-Approval Modif.
- etc.

Interaction to better understand & implement QbD, etc.

Microdose-Guideline

- EMEA : Single-dose Microdose (2003)
- FDA : Exploratory IND (2006)
- MHLW : ---------



ICH M3 EWG Re-convened 2006

ICH Step 2 July 2008

MHLW : Microdose Guidance (June 2008)