



Clinical Trial Regulatory in China

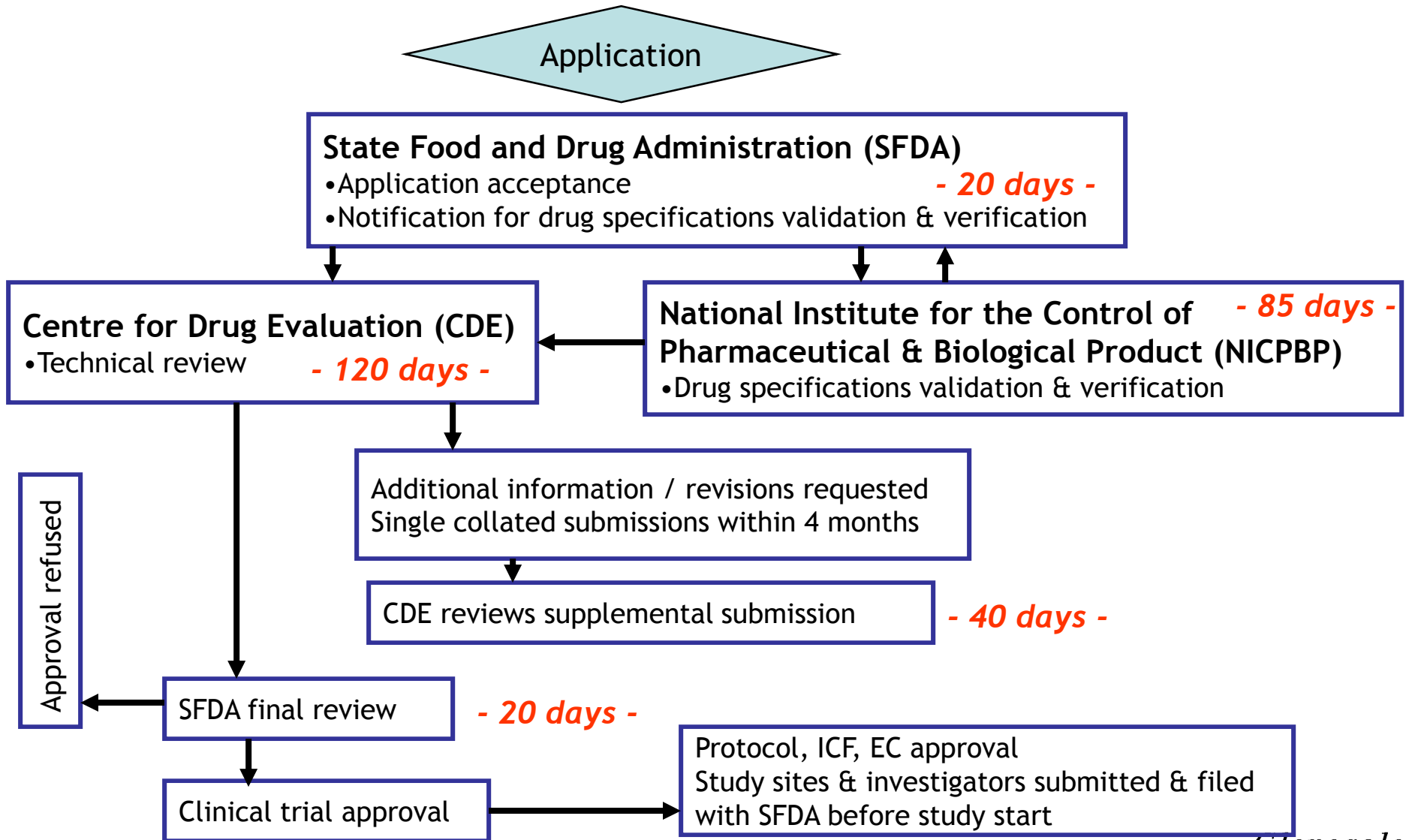
Deng Yazhong
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Vice President , China CRO Union

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Intercontinental Hotel, Singapore

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Regulatory Process for Clinical Trial



Data Requirement

➤ Depend on the drug category

➤ General requirement:

Part I General data and Administrative document

Part II Chemical, Pharmaceutical and Biological data

Part III Pharmacological and Toxicological data

Part IV Clinical Data Related

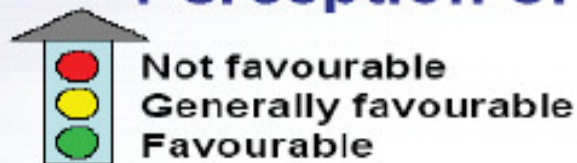
Pre-defined patient number in test drug group

| Category | Number of subject |
|------------------------|---|
| Category I-II | Phase I, 20-30 Phase II, 100 (1000 for contraceptives) Phase III, 300 Phase IV, 2000 |
| Category III-IV | PK study + <u>100</u> subjects |
| Category V: | BE study or PK study+100 subjects |
| Addition of indication | 60 – 300 subjects |

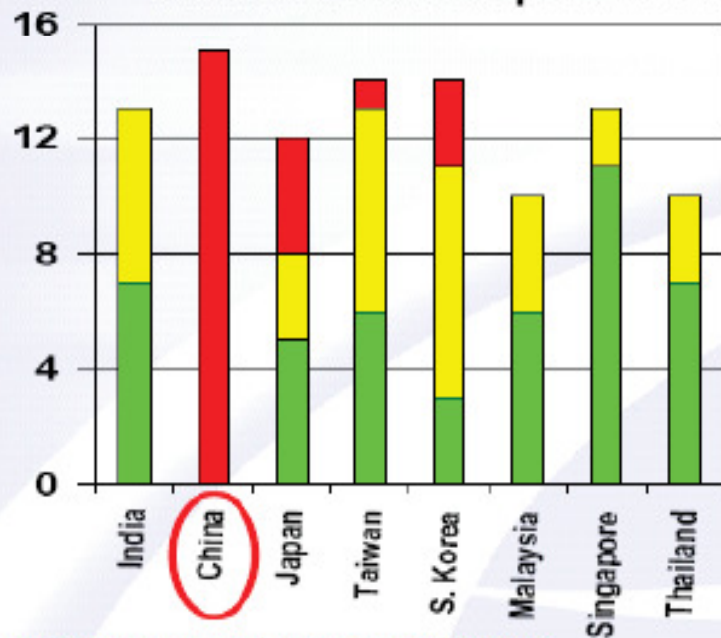
Regulatory Challenges in China: Timeline

Regulatory Challenges for Global Drug Development

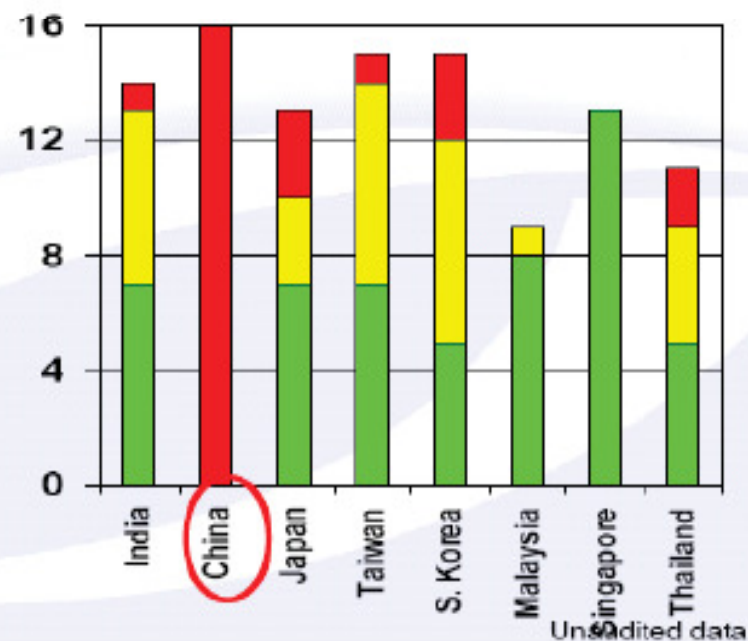
Perception of the Regulatory Environment



Data/technical requirements



Time taken to review CTA



CMR International Institute for Regulatory Science

Unaudited data

Data Source: Dr. Neil McAuslane, CMR International Institute for Regulatory Policy, CMR workshop in Japan, October 2006

Reasons behind the timeline: SFDA

- Historic reason: Generic VS Innovation: Huge workload
- Staff shortages at SFDA and CDE
- Late stage human trial (>II), China is not involved in earlier phases.
- Background and historic data never been reviewed by SFDA
- No pre-consultation, communication and exchange views
- Intensive CMC review requirements

Reasons behind the timeline: Sponsor

➤ Clinical Protocols

Poorly written Protocol, study objective, endpoints are not clear to Agency reviewer, supplemental materials often required

➤ Dossier preparation

Dossier not meet submission requirements.

Not sufficient pre-clinical safety and CMC data

➤ Insufficient Communication

Local applicants can not answer the questions raised by SFDA/CDE, need consult with foreign headquarters

Development of SFDA

Transforming Into A Science-Based Regulatory Agency

The screenshot shows the homepage of the Center for Drug Evaluation, SFDA. The header includes the logo and name in Chinese and English. A navigation menu contains links for Home, News Center, Policy Regulations, Organization, Service Hall, Academic Exchange, and Feedback. The main banner features the slogan: **公开 公平 公正** (Openness, Fairness, Rightfulness) and **保障上市药品的安全有效 维护和促进人民群众健康** (Ensuring efficacy/safety of marketed drugs and protecting/promoting public health). A red box highlights this slogan, with a blue arrow pointing down to the English translation below.

Openness, Fairness, Rightfulness

Ensuring Efficacy/Safety and Protecting/Promoting Public Health

Transforming of SFDA

| Time | Event | Purpose |
|---------------|---|---|
| 2006 | A New drug regulatory framework | To correct the flaws in the past regulatory |
| October 2007 | New Drug Registration regulation | Make the application and review process open and transparent |
| January 2008 | “Supplemental Requirements for Registration of Traditional Chinese Medicines” | revolutionary change the approach to evaluate and approve TCM |
| May 2008 | On-site Inspection for Drug Registration | |
| January 2009 | Special Approval of New Drug Registration | To encourage innovation |
| February 2009 | Dataset submission | Future streamlined review |

Improvement after in the DRR

| Item | Improvement |
|-----------------|---|
| IND review time | Reduced from 120 to 90 days, further reduce to 80 days |
| New Module | Pre- meeting Special application |
| Sample testing | No need for sample testing and specification verification |
| | |

Special Approval Process

1. TCM derived from Herbal, animal, and mineral that have never been previously used as therapeutics
2. New chemical entity (NCE)
3. Products treatment for AIDS, malignant tumor, rare diseases (orphan drugs)
4. Products for the diseases that efficacious treatment are not available yet

Special Approval

- Early intervention
sponsor can contact SFDA for consultation before submission
- Priority review
- Multi-channel communication,
Communication platform: Pre IND-consulting
Discussion on Special procedure, after pre-clinical
End of Phase II Meeting, End of Phase III Meeting
Pre NDA Meeting
- Dynamic data supplement
Allowing amendment or supplementary submission in a more simplified way

Transforming into a Science-Based Regulatory Agency

GRP Effort in China



What is GRP in China ?

- Good Review Practice
- Good Regulatory Practice
- Good Registration Practice

SFDA Working groups on GRP

2006.12

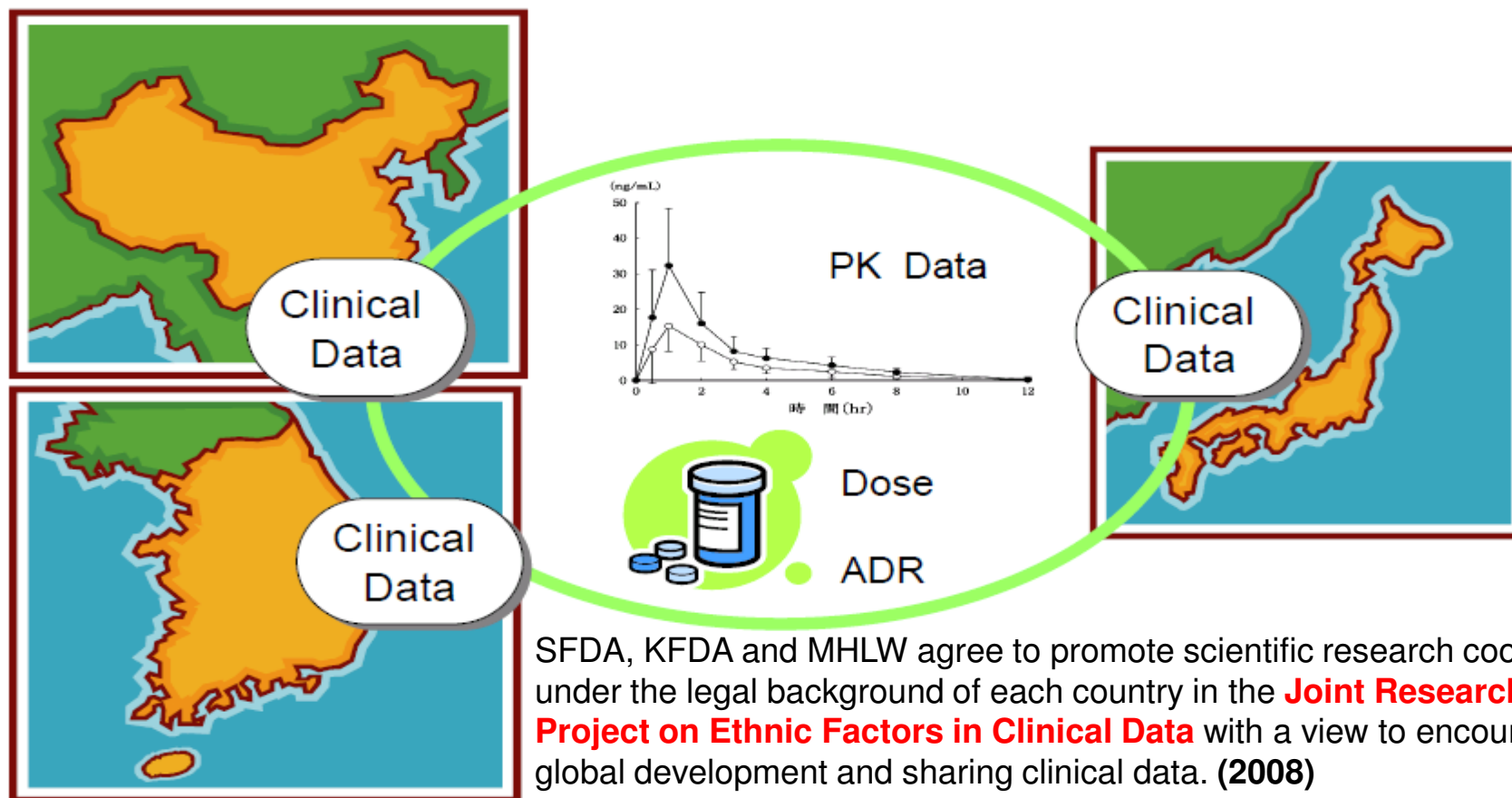
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Acceptance of common East Asian ethnicity assessments

China/Korea/Japan Joint Research Project on Ethnic Factors in Clinical Data



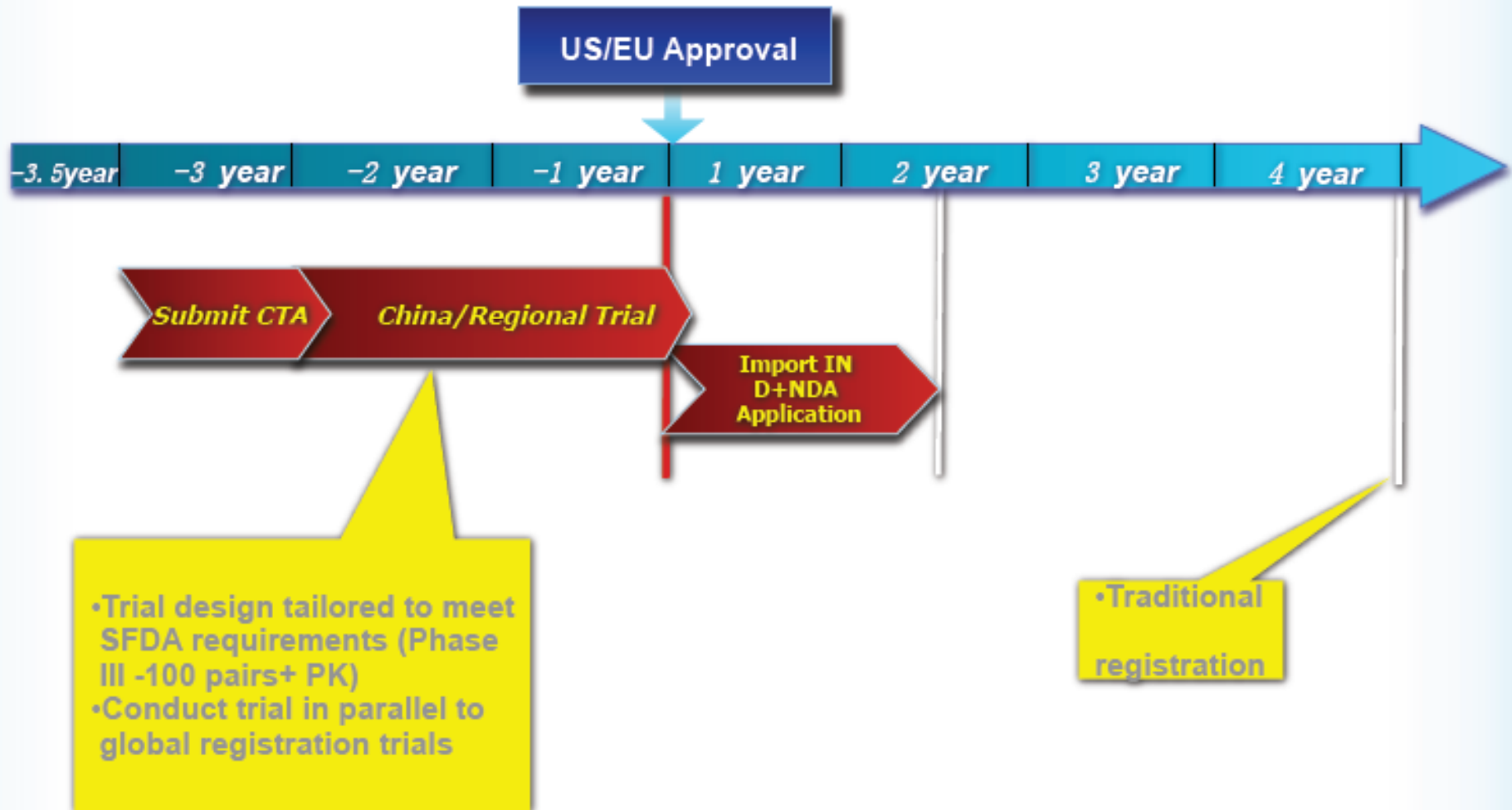
What is Expected

- Shorter CTA approval timeline for “Innovative products”
- Removal of predefined patient allocation targets
- Increased opportunity for development consultation
- Increased acceptance of common East Asian ethnicity assessments
- More technical requirements, but more guidance to follow.
- Review & approval process control strictly by computer system, more detail but more transparent
- Regulatory Biostatistician

Industry Strategies

- Understand the regulatory direction
- Build up a local scientific capacity and capability
Regulatory affair, scientific
- Build up the communication channel with SFDA
- Submit a high quality complete application
- Earlier Involvement of China development:
Asian Studies

Shorten the lag time in China



Contact Information

- Thank you for your attention and participation!
- Best wishes : A successful registration of your Products in China!
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