Agence nationale de sécurité du médicament et des produits de santé

Information bulletin

Enforcement of the European regulation on clinical trials on medicinal products: assessment eighteen months into the pilot phase

In order to prepare for the enforcement[1] of the European regulation on clinical trials on medicinal products for human use (EU Regulation no. 536/2014), the *Agence nationale de sécurité du medicament* (French National Agency of Medicine and Health Product Safety) (ANSM) set up a pilot phase on 28 September 2015, in conjunction with the stakeholders concerned: academic and industrial sponsors, and ethics committees (EC).
This third assessment takes into account the recent legislative and regulatory changes (coming into force of the Jardé Law[2]), which have resulted in the implementation of organisational changes with a view to incorporating all 39 French EC.
Therefore, the ANSM and the CPP undertake to evaluate trials within 60 days at the latest, and to forward a single notification to the sponsor, which will include the ANSM's decision and the EC's opinion.
France was the first European country to launch a pilot phase and the third assessment demonstrates strong collective mobilisation to reinforce the attractiveness of France within European clinical research.

The positive progress of the pilot phase identified in the 6- and 12-month assessments continues to be made:

- Collective adherence and constructive exchanges between the sponsors, the EC and the ANSM;
- Increase of sponsors' contribution: academic (23 different sponsors) and industrial (29 different sponsors);
- Adjustment of the organisational process following the coming into force of the Jardé Law[2] over the last six months and incorporation of all 39 EC. These changes were incorporated into v5.0 of the Practical Guide (18/01/2017);
- Appropriation of a process moving closer to the planned future organisation with enforcement of the future European regulation.

18-month assessment of trials received in the framework of the pilot phase (from 28 September 2015 to 31 March 2017) compared to the previous assessments (6 and 12 months)

152 clinical trial authorisation applications were received during the pilot phase out of the 1,292 total applications received by the ANSM (13.3% of applications) over the period in question.

This represents an increase in the number of files received during the pilot phase compared to the total number of files received in the first 6 and 12 months (11% and 12.5% of applications received by ANSM respectively).

It should be noted that the number of clinical trial authorisation applications received during the pilot phase continues to increase, compared to the overall number of applications received by the ANSM over the last six months, despite the legislative and regulatory changes resulting from the coming into force of the Jardé Law[2].

Comparatively, for these 152 applications:

[1] Initially set to take effect in May 2016, enforcement shall only become effective with the setting up of the single European portal.
[2] Law no. 2012-300 of 5 March 2012 on research involving human subjects, as amended by Order no. 2016-800 of 16 June 2016 and its Enforcement Decree no. 2016-1537 of 16/11/ 2016 on research involving human subjects (O.J. 17/11/2016)

	Sponsor type		Trial type					Trials involving research centres	
	academic	industrial	Phase 1	Phase 2	Phase 3	Phase 4	NS*	national	international
first 6 months (51 files)	18	33	15	13	17	6	0	19	32
12 months (112 files)	50	62	24	28	53	7	0	52	60
18 months (152 files)	66	86	31	42	68	10	1	67	85

*NS = not specified

Clinical trials processed by 31 March 2017 (applications for which a notification was issued)

128 clinical trial authorisation applications are closed out of the 152 received during the pilot phase.

Sponsor type		Trial type					Trials involving research centres	
academic	industrial	Phase 1	Phase 2	Phase 3	Phase 4	NS*	national	international
56	72	24	35	60	8	1	58	70

Of the 128 applications:

- 98 were authorised by the ANSM and received a favourable opinion from the relevant CPP.
The average time frame of final notification for initiation of trials is 65.5 days.

- 30 remaining files were closed in the following way:

	ANSM conclusion	**Relevant CPP conclusion**
13	authorisation	opinion not received by the ANSM [a]
4	authorisation	unfavourable opinion
7	sponsor withdrawal (potential refusal from the ANSM)	favourable opinion
3	sponsor withdrawal (potential refusal from the ANSM)	opinion not received by the ASNM [b]
2	spontaneous sponsor withdrawal	opinion not received by the ASNM [c]
1	no response from sponsor (the application was deemed to have lapsed)	favourable opinion

[a] including 10 favourable opinions received beyond time frames
[b] including 1 opinion received beyond time frames
[c] including 1 opinion received beyond time frames

Time frames were also met at each stage of the process (admissibility, question submission, final notification).

The mobilisation of all the stakeholders taking place since September 2015 will continue, aiming to:

- significantly increase the proportion of cases submitted in the pilot phase;
- improve the appropriation of the new system by all actors;
- optimise the French organisational process (in particular, improve the decision time frames);
- move towards the planned future organisation by the enforcement of the European regulation, offering a single circuit (i.e., a central depot, then centralised delivery when sending admissibility, questions and final notification).

Further reading

- Practical Information Guide for Applicants (18/01/2017) (333 ko)

  http://ansm.sante.fr/content/download/78617/996267/version/11/file/Q16PDOC009A_AEC_MED_PHASE_PILOTE_+v05_18012017-english-Guide-applicants.pdf

- Enforcement of the European regulation on clinical trials on medicinal products: assessment one year into the pilot phase (25/01/2017)- Information bulletin

  http://ansm.sante.fr/content/download/101055/1281849/version/1/file/PI-european-regulation_EC_Phase+pilote_+GB+EN+V05-01-2017.pdf

- Enforcement of the European regulation on clinical trials on medicinal products: assessment six months into the pilot phase (11/04/2016)- Information bulletin

  http://ansm.sante.fr/content/download/87881/1106179/version/1/file/PI_Essais-Cliniques_Reglement-Europeen_Phase-Pilote_GB_19-04-2016.pdf

- Enforcement of the European regulation on clinical trials on medicinal products: The ANSM starts a pilot phase (14/04/2015)- Information bulletin

  http://ansm.sante.fr/content/download/75945/964761/version/1/file/PI_EC_Phase-pilote_GB_14-Avril-2015.pdf