国際共同治験に関する基本的考え方(参考事例)

#### 平成24年9月5日

(独) 医薬品医療機器総合機構

#### はじめに

我が国が参加する国際共同治験の経験は、平成19年に「国際共同治験に関する基本的考え方について」(平成19年9月28日付薬食審査発第0928010号、厚生労働省医薬食品局審査管理課長通知)が通知されてから着実に増加しており、近年では、欧米との国際共同治験だけでなく、日中韓等の東アジア地域での国際共同治験も増加している。また、我が国と海外との連携内容も、開発の初期段階からの国際共同治験の実施や数千例を超える大規模国際共同治験への参加等多様化しつつある。さらに、規制当局間においても、日米欧だけでなく日中韓3カ国の連携も強化されつつあり、医薬品の国際開発が進む中で、国際共同治験、特に東アジア地域における国際共同治験が円滑かつ適切に実施されることは、得られた結果の評価を行う規制当局にとっても重要な課題である。

このような状況を踏まえ、既発出の「国際共同治験に関する基本的考え方について」の理解をさらに深め、我が国がより早い段階から国際開発に円滑に参加するとともに、今後も増加が予想される東アジア地域における国際共同治験等の円滑かつ適切な実施に資することを目的に、今般、近年の事例を踏まえて、国際共同治験に関する基本的考え方(参考事例)を取りまとめることとした。

以下にその内容を示すが、これらは一般的な事例を示したものであり、個々のケースについては、(独)医薬品医療機器総合機構(以下、「PMDA」という。)との対面助言において相談することが推奨される。

なお、これら事例は、現時点における科学的知見に基づいて述べたものであり、今後の状況の変化、科学技術の進歩や知見の集積等に応じて随時見直され、改訂されるべきものであることに留意する必要がある。

# 1. 東アジア地域での国際共同治験に関する留意事項

1) 東アジア地域で国際共同治験を実施するにあたって特に留意する事項はあるか。

日中韓等の東アジア地域の民族間では、代謝酵素における遺伝子多型の種類と頻度あるいは遺伝子プロファイルが類似していると考えられ、近年では、東アジア地域での国際共同治験を主たる臨床試験結果として承認された医薬品もある。したがって、十分な検討に基づき計画され、実施された東アジア地域での国際共同治験の結果を、本邦での承認申請資料として受け入れることは可能である。

しかしながら、東アジア民族間においても民族的要因(内因性民族的要因のみならず、医療習慣や社会経済的要因等の外因性民族的要因も重要)の差異が、医薬品の有効性及び安全性(データそのものだけではなく、評価に及ぼす影響も含む。以下同様)に影響を及ぼす可能性はあるため、東アジア地域で実施する治験であっても、欧米諸国と実施する国際共同治験の場合と同様に、民族的要因の差異が医薬品の有効性及び安全性に及ぼす影響について予め十分に検討した上で、国際共同治験を計画し実施する必要がある。

特に、東アジア民族を一つの集団と捉えて検証的な治験を実施しようとする場合には、予め十分なデータや情報を収集した上で日本人と他の東アジア民族間における民族的要因の影響について検討し、その結果を踏まえて適切な仮説に基づく試験計画を策定することが適切であり、臨床薬理学的試験を別途実施することで有用なデータが得られる場合もある。具体的な試験デザイン、評価方法等については、事前に PMDA の対面助言で相談することが推奨される。

今後、東アジア地域における科学的データや情報をより集積し検討することで、民族的要因の差異に関する理解が深まり、東アジア地域における国際共同治験をより円滑かつ適切に実施することにつながると考えられる。このような検討を積み重ねることによって、東アジア地域を含む臨床開発の効率化と質の向上が期待され、最終的には、本邦の承認申請に東アジア地域で実施された国際共同治験の結果をさらに利用しやすくなるものと考えられる。したがって、開発計画の中に東アジア地域における国際共同治験を含めることも検討し、東アジア地域での情報を集積することが望まれる。

2) 東アジア地域での国際共同治験を 計画することが推奨される疾患領 域はあるか。 どのような疾患領域であっても東アジア地域での国際共同治験を実施することは可能と考えられるが、東アジア地域で特に必要性が高い医薬品、例えば、欧米に比べて東アジア地域で罹患率が高い疾患領域(例:胃癌、肝炎等)で、かつ日本単独では検証試験の実施が困難な疾患領域では、東アジア地域での臨床開発を積極的に計画することが、臨床開発全体の効率化や質の向上に寄与する可能性がある。なお、計画時には、上記1)を参照するとともに、東アジア地域だけでなく欧米等も含めた全世界的な開発を目指す場合には、世界全体での臨床開発計画における東アジア地域での国際共同治験の位置付けを、予め明確化した上で開発を進めることが適切であり、欧米等での開発と連携を保ちつつ東アジア地域での開発を進めることが必要である。

3) 民族間における薬物動態プロファイルの比較から、どのような国際 共同開発戦略を構築することが、 一般的には可能であるか。 開発戦略は、様々な要因を考慮して決定されるものであり、一般的に確立された考え方はないが、日本における医薬品の承認を目的として開発を進める場合で、薬物動態プロファイルの差異に着目すると、日本人と欧米人又は日本以外の他の東アジア民族との比較等を行うことが考えられる。

日本人と欧米人との間で、薬物動態に大きな差異がないと考えられる場合には、早期の探索的な試験から日本人と 欧米人での国際共同治験の実施が可能と考えられ、欧米諸国と継続的に連携しながら国際共同開発を行うという選択 肢について検討することが有用である。一方、日本人と欧米人との間で薬物動態に大きな差異が認められるものの、 日本人と他の東アジア民族との間で大きな差異がないと考えられる場合には、日本人と他の東アジア民族を主とする 探索的な国際共同治験の実施が考えられ、東アジア地域を主体として開発するという選択肢について検討することが 有用である。日本人と外国人(欧米人あるいは他の東アジア民族)との間で薬物動態に大きな差異が認められる場合には、その差異が生じる理由並びにそれが有効性及び安全性に及ぼす影響について詳細に検討した上で開発計画を立案すべきであり、日本人における単独での探索的試験の実施についても検討が必要である。

検証的な試験を国際共同治験として実施するか否かについては、探索的な試験等の結果に基づき判断する必要があるが、薬物動態プロファイルでの差異のみならず、どのような民族的要因が医薬品の有効性及び安全性に影響を及ぼしているのかについて、層別解析等の結果に基づき十分に検討することが必要であり、検証的な試験を開始する前に、組み入れる全集団での結果を主要評価項目として設定し、評価することの適切性を説明する必要がある。なお、得られた試験結果の評価に関しては、本文書の項目「6)国際共同治験の結果を評価する際に留意すべき点は何か。」を参考にしていただきたい。

4) ブリッジング試験を国内臨床試験 ではなく東アジア国際共同治験と して実施し、欧米で実施された臨 床試験結果を外挿することは可能 か?また、その際に留意すべき点 は何か。 通常、ブリッジング試験は、海外で実施された臨床試験結果を日本人に外挿することを目的としており、日本人を対象として実施される。したがって、東アジア国際共同治験をブリッジング試験と位置付け、欧米の試験結果を外挿しようとする場合には、予め十分なデータや情報を収集した上で、日本人と他の東アジア民族との間で民族的要因の影響が評価を行う上で問題にはならないという科学的根拠を説明する必要があり、得られた結果においても日本人と他の東アジア民族との間で一貫した結果が確認できていることがブリッジングコンセプトに基づく評価を行う上での前提となる。個別のケースについては、予め PMDA の対面助言で相談することが推奨される。

なお、ブリッジング試験を国際共同治験として実施する上での留意点等については、既に ICH E5 ガイドライン質問 11 に対する回答(『「外国臨床データを受け入れる際に考慮すべき民族的要因についての指針」に関する Q&A について (20.3) 、平成 18 年 10 月 5 日付事務連絡)で述べられているので、参考にしていただきたい。

# 2. 国際共同治験に関する一般的な留意事項

5) 医薬品開発の国際化が進む中で、 日本における臨床開発戦略及び 臨床試験計画を立案する上で留 意すべき点は何か。

医薬品の臨床開発計画を立案する上で重要なことは、長期的かつ全体的な開発計画を立案するとともに、開発期間中においても、適宜、その時点までに得られているデータを適切かつ十分に評価し、臨床開発の進め方や次相以降の臨床試験計画の効率化や最適化を図ることであり、早期から継続的に臨床開発計画等について PMDA と相談することが推奨される。

医薬品開発の国際化が進展する中では、国際共同開発の可能性を考慮することが多いと思われるが、開発戦略の 如何に関わらず、常に関係する海外担当部署と必要な連携や協力を保ちながら、医薬品開発を進めることが望まし い。海外担当部署との連携あるいは協力とは、海外との共同治験の実施だけを指すものではなく、国内又は海外で 単独で実施する臨床試験であっても、その試験計画立案への関与、試験計画・有効性あるいは安全性情報等の適時 共有、定期的な薬事連絡等あらゆる連携や協力を含むものである。

すなわち、医薬品開発の早期から常に海外関連部署との連携を保ちながら、関係者がある医薬品に関する最新の データや情報を正確に理解し共有した上で開発計画を検討し立案することが、開発計画の効率化や最適化につなが るものと考えられる。日本での承認に向けたより適切な開発計画を立案するためにも、開発早期の探索的な段階か ら日本人患者でのデータを集積していくことが望ましい。

現時点において日本で又は日本を含めて実施されている主な臨床開発戦略としては、国内単独で臨床試験を実施する開発、海外臨床試験結果を外挿するブリッジングによる開発、検証試験を含めた臨床試験を海外と共同で実施する国際共同開発の3つがあり、国際共同開発には欧米等と連携して実施する世界規模の国際共同開発及び日中韓等の東アジア地域を中心として実施する東アジア国際共同開発があると考えられる。これらの開発方法の特徴を十分に考慮し、開発中の医薬品の性質やその時点で得られているデータ等から、次相として最も適している臨床試験計画を策定することが重要である。

6) 国際共同治験の結果を評価する際に留意すべき点は何か。

日本人を対象に国内で実施される臨床試験の結果の評価と同様の手順で、患者背景の確認、有効性評価、安全性評価を行うことが原則である。評価の際には、全集団の評価に加えて日本人集団のみの評価を行った上で、全集団との間の一貫性について検討することが必要となるが、日本人集団が試験における部分集団であり必ずしも試験目的を達成するのに十分な症例数が組み入れられていない可能性、組み入れられた集団間に結果として差異が生じている可能性等に留意することが重要である。したがって、日本人集団の結果の評価に際しては、日本人症例数を踏まえ、点推定値のみならずその精度(標準偏差等)にも着目する必要がある。また、日本人集団における主要評価項目の評価だけではなく、副次評価項目についても、主要評価項目の結果や全集団の結果と同様の結果が示されているか確認すべきである。また、安全性についても同様に、全集団と日本人集団との間で著しく異なった傾向が認められていないか確認すべきである。全集団と日本人集団との間で結果に差異が認められた場合には、要因毎の部分集団解析結果等も参考に差異が生じた原因について十分に考察し、当該国際共同治験の結果を日本人の有効性及び安全性の根拠とすることが可能であるのか慎重に評価する必要がある。

なお、これらの評価結果及び考察については、申請時に CTD に適切に記載すべきである。

7) 海外在住日本人を対象として、海

海外で実施された試験結果を適切に評価するためには、まずは、ICH E5 ガイドラインで述べられているような民

外で実施された試験結果を評価する上で、留意すべき点は何か。

族的要因(内因性及び外因性)について考慮することが重要である。

その上で、開発初期に日本人での薬物動態を評価する試験は、通常健康成人で実施されることが多く、医療環境よりも、遺伝的要因等の内因性民族的要因が結果を評価する上で重要であり、食事等の生活環境等の外因性民族的要因の違いによる影響を考慮する必要があるものの、多くの場合、海外在住日本人を対象として海外の治験施設で実施された結果から日本人の薬物動態を評価することは可能である。

一方で、有効性及び安全性を評価する試験では、内因性民族的要因のみならず、診断方法や標準治療等の医療環境、教育、文化等の社会的要因等の外因性民族的要因を考慮する必要がある。したがって、日本人における有効性及び安全性については、日本の医療環境下で確認すべきであり、日本在住の日本人が適切に組み入れられた臨床試験(国際共同治験又は国内単独での臨床試験)の結果に基づき評価することが適切である。

8) 異なった民族での薬物動態を比較する上で一般的に留意すべき 点は何か。 一般に、異なった民族間での薬物動態を比較する際には、内因性民族的要因以外の要因による変動を低減するため、測定方法等も含め同一プロトコル(別試験での実施も含む。)で収集した薬物動態結果に基づき比較することが望ましい。また、代謝酵素やトランスポーターにおける遺伝的変異が、開発中の医薬品の薬物動態に影響を及ぼすと考えられる場合には、その遺伝的変異の各民族における発現率等も考慮し、治験において遺伝子検査を実施し、各遺伝型での集計なども行った上で、評価することが重要である。

独立して実施された複数の薬物動態試験結果を比較して、各民族での薬物動態の類似性や差異を考察する場合には、内因性民族的要因のみならず、外因性民族的要因についても考慮に入れないと、結果の解釈を誤るおそれがある事例が最近明らかとなっており(平成 22 年度厚生労働科学研究費補助金・行政政策研究分野 地球規模保健課題推進研究(日中韓大臣声明に基づく医薬品の民族差に関する国際共同臨床研究)川合班報告書)、試験方法、対象被験者、定量法(バリデーションの有無、定量限界等を含む)、測定時点、投与条件、投与薬物の用量や製剤、試験結果の標準偏差の大きさ(はずれ値の存在の有無等を含む)、実施時期等における各測定方法間の差異を精査し、差異がある場合には、その差異が評価に影響を及ぼす可能性及び程度について、十分な検討を行った上で試験間の比較を行う必要がある(製剤が異なる場合には製剤間での生物学的同等性の有無等も含む)。

同一プロトコルで収集した日本人と他の民族での薬物動態試験結果が存在しない場合には、その後に実施する治験計画を工夫することなどにより、遅くとも検証的な国際共同治験を実施する前までには、少なくとも投与後の数点において、同一プロトコルによる薬物動態特性から適切と考えられる指標(例: C<sub>max</sub>、トラフ値等)のデータを、検証試験に組み入れることを予定している主要な民族で入手できるよう計画することが望ましい。

9) 第 I 相試験 (First in Human) を 国際共同治験として実施する際 の留意点は何か。

第Ⅰ相試験の段階から国際的な連携をとりつつ日本が国際共同治験に積極的に参加することは、開発時期の遅延を生じることなく、日本人における忍容性、薬物動態等の結果を開発早期に収集することが可能となり有用な情報が得られると考えられる。

しかしながら、第 I 相試験を国際共同治験として実施する場合には、参加する国・地域の全ての被験者の安全性 確保にも配慮する必要があり、各施設で発現した有害事象や治験を実施する上での懸念等が、直ちに参加する全て の施設間で適切に共有できるよう措置を講じる必要がある。したがって、第 I 相試験を国際共同治験として実施するか否かについては、国内単独で実施する場合とのメリットとデメリットを比較検討して判断する必要がある。

また、一般的に、第1相試験は、医薬品のヒトでの忍容性を確認することを主眼としており少数例で実施されるため、薬物動態や薬力学等における民族的な類似性や差異を検討するためのデータや情報は限定的であり、第1相試験を国際共同治験として実施した場合の民族間比較は、探索的な位置づけと考えられる。

したがって、第Ⅰ相試験以降の国際共同治験にも継続的に日本人を組み入れ、民族的要因が医薬品の有効性及び 安全性に及ぼす影響をさらに検討することが適切である。また、民族的要因の差異が大きいと考えられる場合など には、別途、臨床薬理試験等を実施して検討することが必要な場合もある。

10) 国内の臨床試験では単独投与の 検討しか行っていないが、医薬 品Aとの併用投与で実施予定の 探索的な国際共同試験に参加す ることは可能か。 原則として、国際共同治験への参加前に日本人での医薬品 A との併用投与時の投与経験を得ておくことが適切である。ただし、海外臨床試験の結果等から、併用を必須とする医薬品 A を治験薬及び治験で併用する可能性のある他の薬剤と併用投与した場合であっても、安全性上のリスクが増大するおそれはなく、かつ治験に用いる医薬品 A の用量が既に本邦において十分な臨床使用経験があり、安全性も確立していると考えられる場合には、国内での医薬品 A との併用試験を実施しなくとも、国際共同治験に参加できる可能性はあると考えられる。

なお、個別のケースについては、その時点で得られている科学的データ、情報等を整理した上で、PMDA の対面 助言で相談することが推奨される。

11) 国内外で治験薬の曝露量が異なる(日本人の曝露量が外国人よりも高い又は低い)場合に、ある程度以上の被験者数を確保し、薬物の安全性プロファイルや最低限の検査を考慮して安全

日本人と外国人での薬物動態が大きく異なった場合に、探索的な用量反応性試験を国際共同治験として実施し、 日本人を組み入れるか否かについては、差異が生じた機序や理由を十分に検討し、臨床推奨用量が異なる可能性も 考慮し、国内単独で実施する場合とのメリットとデメリットを慎重に比較検討して判断する必要がある。

例えば、日本人における血中薬物濃度が外国人よりも高くなったとしても、既に実施した第 I 相試験等の結果から、日本人における治験薬の忍容性は確認されており、安全性を担保するための十分な措置が講じられる場合には、探索的な国際共同用量反応性試験へ日本人を組み入れることは可能であるが、想定される副作用等も考慮し、日本

性評価を実施するという前提の もと、探索的な用量反応性試験 を国際共同治験として実施し、 日本人を組み入れることは可能 か。 人における安全性モニタリングを強化する等の措置を講じることが適切な場合もある。

なお、治験での用量設定にあたっては、日本人や外国人で既に得られている薬物動態、薬力学等の情報を十分に検討し、当該治験に組み入れられる各民族での臨床用量を含むように、適切な範囲を設定することが重要である。また、当該治験における日本人症例数の設定については、「国際共同治験に関する基本的考え方について」(平成19年9月28日付薬食審査発第0928010号)の質問6の回答に基づき検討することが適切であるが、薬物動態が大きく異なるような場合には、日本人と外国人における臨床推奨用量が異なる可能性もあるため、実行可能性を考慮しながらも日本人での用量反応関係が十分に検討できるよう、より保守的に設定することが望ましい。

- 12) 優越性又は非劣性の検証を目的としてないが、探索的な比較、 陽性対照等の目的で実薬対照群を設定した試験において、設定した実薬対照が日本で未承認薬である場合、日本人集団を実薬対照群には割付けないという方法は受入れられるか。
- 国際共同治験の結果を適切に評価するためには、当該治験に参加するすべての国・地域において、試験の目的を 踏まえて比較可能な条件下で検討できるよう予め調整すべきであり、日本人のみ構成する比較群が異なるような試験計画は適切ではない。なお、対照薬が本邦で未承認であっても、当該対照薬が既に国際的に確立した薬剤の場合 には治験での使用が可能である旨が、「国際共同治験に関する基本的考え方について」(平成 19 年 9 月 28 日付薬食 審査発第 0928010 号)の質問 9 の回答で述べられているので参考にしていただきたい。

なお、治験依頼者は、当該治験開始前に対照薬に関する情報を海外添付文書、公表文献等から可能な限り入手し 提出するとともに、安全性情報に関して、開発中の治験薬だけでなく、対照薬についても継続的に収集し報告でき る体制を確立しておくべきであり、対照薬となる未承認薬のライセンスを取得している企業との間で、予め相談し、 安全性情報の交換方法・手順等を定めておくことが望ましい。

- 13) 国際共同治験での対照薬として 実薬を用いる場合に、実薬の有 効成分は国内外で既に承認され ているが、用法・用量又は製剤 が異なる場合に、どのような点 に留意すべきか。
- 対照薬である実薬は、既に臨床現場において広く使用されている医薬品が選択され、有効性及び安全性に関して 治験薬と比較するために設定されるものであり、国際共同治験での対照薬として実薬を用いるのであれば、参加す る国・地域において承認されている医薬品を承認用法・用量の範囲内で使用することが望ましい。また、科学的に 適切な評価を行う観点からは、参加する国・地域間で対照薬の用法・用量に差異がないことが原則である。

しかしながら、現実的には参加する国・地域間で、対照薬の承認用法・用量に差異が認められる場合もあり、これらの差異が有効性及び安全性に影響を及ぼす可能性について、予め十分な検討が必要である。例えば、対照薬の承認用法・用量が国内外で異なる場合には、参加する国、地域間で異なる用法・用量が承認された理由や経緯を確認し、有効性及び安全性に及ぼす影響を検討すべきである。特に、漸増時の用法・用量が異なる場合には投与初期の脱落率等に、最大用量が異なる場合には副作用発現率等に影響を及ぼす可能性がある。また、製剤が国内外で異なる場合には、参加する国、地域間で異なる製剤が承認された理由や経緯を確認するとともに、製剤上の差異が溶

出特性や血中薬物濃度等に及ぼす影響について検討が必要である。さらに、同一試験で異なる用法・用量あるいは 製剤を用いることによる盲検性担保への影響についても検討すべきである。

検討の結果から、対照薬の国内外での差異が有効性及び安全性に無視できない重大な影響を及ぼすと考えられる場合には、そのような薬剤を対照薬として設定することは避けるべきであり、本邦と同様の用法・用量及び製剤で実施できる国・地域での治験を実施すること、あるいは別の薬剤を対照薬として設定すること等について検討が必要である。

なお、国内での承認用法・用量とは異なるものの、国際的な教科書、診療ガイドライン等で既に用法・用量が確立しており、国内の医療現場においても国際的な用法・用量が広く受け入れられている場合には、治験における用法・用量を国際的な用法・用量に合わせることが可能な場合もあると考えられる。個別のケースについては、対照薬の取り扱いも含め PMDA の対面助言で相談することが推奨される。

14) 治験薬と併用する既存薬の効能・効果や用法・用量が国内外で異なる場合には、国際共同治験の実施は可能か。

国際共同治験は、様々な国・地域が参加して実施されるため、併用する既存薬の効能・効果や用法・用量が、それぞれの国・地域における医療環境等により異なる可能性が想定される。したがって、併用する既存薬での差異が治験薬の有効性及び安全性に及ぼす影響について十分に検討した上で、国際共同治験を実施する国・地域を適切に選択すべきである。

治験に参加する国・地域間で、併用する既存薬が治験薬の有効性又は安全性に影響を及ぼすことが明らかで、治験薬の有効性及び安全性を評価するために、その既存薬の併用が必要であり、治験薬の使用時に効能・効果あるいは用法・用量等で併用薬についても明確に規定する必要がある場合(例:抗がん剤の併用療法等)には、併用する既存薬の用法・用量について、国内外で統一することが望ましい。

一方で、治験に参加する国・地域間で併用する既存薬の効能・効果や用法・用量に差異があったとしても、必ずしも治験薬との併用を前提としておらず、患者の状態によって適宜使用されるような場合(例:うつ病を対象とした治験で併用される睡眠薬等)には、治験薬の有効性及び安全性の評価に大きな影響を及ぼさないことが科学的根拠に基づき説明できることを前提とし、それらの国・地域において国際共同治験を実施することは可能と考えられる。しかしながら、その場合にも、評価に与える影響を最小限とするため、治験中に併用する既存薬の変更は不可とする等、可能な限り試験条件を統一すべきである。なお、治験実施後には、併用した既存薬での差異が治験薬の有効性及び安全性にどのような影響を与えるのかについて、部分集団解析の実施が可能となるよう、治療内容、実施時期等の必要な情報を詳細に記録しておく必要がある。

15) 国際共同治験において、各国の 症例登録が競合的に行われ、治 験開始当初に設定した日本人 目標症例数に到達する前に全 体の登録が終了した場合には、 別途、国内治験を追加する必要 はあるか。 「国際共同治験に関する基本的考え方について」(平成19年9月28日付薬食審査発第0928010号)の質問6の回答で述べているとおり、国際共同治験に組み入れるべき日本人症例数は、全集団と日本人集団との間で結果の一貫性が評価可能なように設定されているものであり、当初に計画した日本人症例数を組み入れることができるよう、治験開始前に十分な検討を行うとともに、治験実施中にも注意深く進行状況をモニタリングして、目標を達成することができるよう、適時適切な対応をとるべきである。

しかしながら、これら可能な限りの措置を講じたにもかかわらず、目標症例数に到達できなかった場合には、実施した対応策と目標を達成できなかった原因、全集団と日本人集団における結果等について十分な検討を行った上で、結果の一貫性が示されているか否かについて判断すべきである。

なお、得られた結果として、日本人症例数が極端に少なく、全集団と日本人集団での結果を比較して評価することが困難となった場合や全集団と日本人集団との間で結果に一貫性が認められず、民族差が示唆され、日本人集団において懸念される事項が認められた場合等には、別途、追加の治験を実施して検討することが必要な場合もある。個々のケースについては、PMDAの対面助言で相談することが推奨される。

16) 生存期間等の真の臨床的評価 指標を用いた大規模な国際共 同治験に参加する際に留意す べき点は何か。 生存期間等の真の臨床的評価指標を用いた数千例又はそれを超える大規模な治験は、症例の集積に要する期間等を考慮し、多数の国・地域が参加する国際共同治験として実施されることが多い。日本からも当該治験に参加することにより、治験の目的となる真の評価指標に関するエビデンスの構築に貢献できる一方で、その試験規模及び参加国・地域の数を踏まえると、真の評価指標に関する全集団の結果と日本人集団の結果の一貫性の検討を十分に行える日本人症例数が確保できない可能性も考えられる。したがって、治験計画時には、それ以前の検討に用いられてきた評価指標において得られている結果や、その評価指標と真の評価指標との関係、治験を実施する国や地域間での差異の影響等を精査し、日本を含む全集団を一つの集団としてみなすことができるか十分に検討する必要がある。

日本人目標症例数の設定に関しては、「国際共同治験に関する基本的考え方」(平成 19 年 9 月 28 日付薬食審査発第 0928010 号)の質問 6 で 2 つの方法が提示されているが、これらは数百例規模での治験を想定しており、大規模治験に適用することは困難な場合もある。どのような試験規模であっても、症例数設定に関しては、現時点で適切な手法は確立していないが、例えば、数千例又はそれを超える大規模な治験の場合には、検証すべき主要評価項目(生存率等の真の評価手法)との関係性が合理的に類推可能で、かつより少数例で評価可能な指標(代替指標)に基づき、結果の一貫性が検討可能な症例数を必要最小例数とし、可能な限り多くの日本人症例を組み入れることも一案である。

治験計画においては、症例数設定に利用した指標に加え、これまでの開発の各段階で用いられた評価指標も副次評価項目として設定し、評価に際しても、主要評価項目である真の評価指標に関する日本人集団と全集団の結果の比較検討に加え、副次評価項目の結果等についても検討することが重要である。これらの検討及び臨床開発を通して得られた情報を踏まえて、大規模な治験において全集団で得られた結果が日本人においても適用可能と判断できることを説明する必要がある。

17) 国際共同治験において、日本人と外国人の一貫性が示された場合で、致死的でない疾患に対して、長期にわたり繰り返し投与が想定される医薬品に関して、長期における安全性を評価するためには、どの程度の日本人症例数が必要か。

医薬品開発の国際化が進んでいる状況において、より効率的な臨床開発を進めるためには、国際共同治験に日本が積極的に参加することが有用と考えられるが、国際共同治験を中心として開発を進めた場合には、承認申請までに収集できる日本人症例数は、国内単独開発に比べ減少し、特に安全性を評価する上で問題となる可能性がある。したがって、致死的でない疾患に対して長期投与が想定される医薬品については、十分に長期投与時の安全性を確認する必要があり、基本的には日本人で1年間投与された症例として100例程度以上の安全性データが収集できるよう計画すべきである。ただし、症例集積が困難な場合等で、例えば、開発早期の探索的な段階から日本が継続的に国際開発に参加しており、複数の試験結果から、日本人と他の外国人との間で安全性に大きな差異がないことが確認できている場合、あるいは他の類似する効能・効果で既に承認されており、外国人と大きな差異がないことが、製造販売後での日本人における十分な安全性データから明らかとなっている場合等には、上記の症例数を満たさなくとも評価が可能な場合もあると考えられるので、個々のケースについては、PMDAの対面助言で相談することが推奨される。

To: Division of Pharmaceutical Affairs,
Prefectural Health Department (Bureau)

From: Evaluation and Licensing Division,
Pharmaceutical and Food Safety Bureau
Ministry of Health, Labour and Welfare

Basic Principles on Global Clinical Trials (Reference Cases)

patients to new drugs. Promotion of global clinical trials is one of the key factors toward timely access of

clinical trial consultations of Pharmaceuticals and Medical Devices Agency. September 28, 2007) had been issued based on the knowledge accumulated through the Pharmaceutical and Food Safety Bureau, Ministry of Health, Labour and Welfare, dated Notification No. Ħ this regard, 0928010, "Basic Principles Director of the on Global Clinical Evaluation and Licensing Division, Trials" (PFSB/ELD

related industries under the jurisdiction of this administrative notice accumulated after the issuance of the above Notification, authorities of Japan, Clinical Trials (Reference Based on the outcome of cooperation in clinical trials among the regulatory China, Cases)" has been compiled and South Korea from 2007 as well as knowledge as attached. "Basic Principles on Global · Please notify

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## Basic Principles on Global Clinical Trials (Reference Cases)

September 5, 2012

Pharmaceuticals and Medical Devices Agency

## Introduction

Since the issuance of "Basic Principles on Global Clinical Trials" (PFSB/ELD Notification No. 0928010, Director of the Evaluation and Licensing Division, Pharmaceutical and Food Safety Bureau, Ministry of Health, Labour and Welfare, dated September 28, 2007), Japan's participation in global clinical trials has been steadily increasing. In recent years, global clinical trials in East Asia (e.g., Japan, China and South Korea) have been increasing as well as those in the U.S. and Europe. The ways of cooperation between Japan and foreign countries has also been diversified. Specifically, Japan has been involved in global clinical trials at an early stage of drug development and large-scale global clinical trials in thousands of subjects. The regulatory cooperation among Japan, China and South Korea has also been reinforced as that among Japan, U.S. and Europe. In the current trend of global drug development, smooth and appropriate conduct of global clinical trials, especially in East Asia, is a critical issue not only for industries but also for regulatory authorities that evaluate study results.

In order to respond to these progress and changes, the Basic Principles on Global Clinical Trials (Reference Cases) has been developed. Based on recent cases, it intends to further promote an understanding of the former Notification in 2007 and ensure Japan's smooth participation in global drug development activities from an early stage as well as smooth and appropriate conduct of global clinical trials in East Asia where an increase in such trials is expected.

Since general considerations are provided for the reference cases listed below, it is recommended to utilize the clinical trial consultation with the Pharmaceuticals and Medical Devices Agency (PMDA) for individual cases.

The following recommendations are based on the current scientific knowledge. It should be noted that they may be reviewed and revised as needed, if situations change, science and technology advances, or evidence accumulates in the future.

# 1. Points to consider for global clinical trials in East Asia

(1) What are the special points to consider when conducting a global clinical trial in East Asia?

The types and frequency of metabolic enzyme polymorphisms and gene profiles are thought to be similar among East Asian ethnicities in Japan, China and Korea. Some drugs have recently been approved mainly based on the data from pivotal global clinical trials conducted in East Asia. Data from well-designed and conducted global clinical trials in East Asia is acceptable for documents of new drug application in Japan.

However, the difference in ethnic factors (intrinsic factors as well as extrinsic factors such as local clinical practice and socioeconomic condition) may affect the efficacy and safety of drugs (effects not only on the data themselves but also on

the evaluation; the same applies below as appropriate) even within East Asia. Global clinical trials conducted in East Asia need to be designed and conducted based on prior sufficient evaluation of the effect of ethnic difference on the efficacy and safety of drugs as in Japan-US-Europe global clinical trials.

Especially when conducting a confirmatory trial in East Asian ethnicities by taking them as one population, the trial should be designed based on an appropriate hypothesis derived from considerations of sufficient data and information on the potential effect of differences between the Japanese and other East Asian ethnicities. Separate clinical pharmacology studies may provide useful data. It is recommended to consult on specific study design and evaluation methods with PMDA in advance.

Further accumulation and review of scientific data and information on East Asian populations will deepen our understanding of ethnic differences and ensure a smooth and appropriate conduct of global clinical trials in this region. Such continuous efforts will improve the efficiency and quality of clinical development in East Asia and eventually facilitate the use of data from a global clinical trial including this region in new drug applications to be submitted to the Japanese regulatory authorities. Therefore, it is encouraged to consider to include global clinical trials to be conducted in East Asia as part of drug development plan and accumulate information.

(2) What therapeutic areas are recommended for global clinical trials to be conducted in East Asia?

A global clinical trial in East Asia can be performed for any target disease area. For diseases with high morbidity in East Asia (e.g., gastric cancer and hepatitis) of which conduct of confirmatory studies in Japan alone are difficult, proactive planning of a global clinical trial in East Asia may contribute to the improvement of the efficiency and quality of clinical development of a drug. Refer to the considerations described in Section 1-(1) above when developing a protocol. When planning global clinical development including East Asia and other regions such as the U.S. and Europe, the role of a clinical trial to be conducted in East Asia in the entire development plan should be defined in advance, and the activities in East Asia should be carried out in cooperation with those in the U.S. and Europe.

(3) What type of global drug development strategy can generally be planned based on data of interethnic comparison of pharmacokinetic profiles?

There is no general rule for a drug development strategy since it should be determined based on a variety of factors. If a drug development strategy aimed at regulatory approval in Japan is discussed based on pharmacokinetic (PK) differences of a drug among populations, comparison of the PK profile between Japanese and Caucasian or between Japanese and other East Asian populations will provide a useful information.

If no marked PK difference is expected between Japanese and Caucasian populations, it will be useful to consider conducting a global clinical trial in Japanese and Caucasian populations from the early exploratory phase, followed by continuous global drug development in cooperation with the U.S. and European countries. When there is a marked PK

difference between Japanese and Caucasian populations but not between Japanese and other East Asian populations, an East Asian exploratory clinical trial including Japanese and other East Asian population can be considered. In this case, drug development in East Asia will be a useful option. When there is a marked PK difference between Japanese and non-Japanese (Caucasian or other Asian) populations, a protocol should be developed based on thorough assessment of the reason for the difference and its effect on the efficacy and safety, and an exploratory study only in Japanese subjects should also be considered.

Whether to conduct a confirmatory trial as a global clinical trial should be determined based on the result of prior exploratory studies. In addition to the difference in PK profiles, effects of ethnic factors affecting the efficacy and safety of a drug should be thoroughly evaluated by data from stratified analyses, etc. Prior to the confirmatory study, the appropriateness of setting and evaluating the treatment outcome in the overall study population as the primary endpoint needs to be explained. See "2-(6) What are the points to consider in evaluating the results of a global clinical trial?" for the evaluation of study results.

(4) Is it acceptable to conduct a bridging study not as a Japanese clinical trial but as a global clinical trial in East Asia and extrapolate the data from US/European studies to the Japanese population? If yes, what are the points to consider?

In Japan, a bridging study generally intends to extrapolate foreign data to the Japanese population and is conducted in Japanese subjects. To extrapolate US/European study data by conducting a global clinical trial in East Asia as a bridging study, sufficient data and information should be collected in advance to scientifically demonstrate that the ethnic difference between Japanese and other East Asian populations will not affect the data evaluation of the study. Furthermore, the consistency of the results between the Japanese and non-Japanese populations should be confirmed in such bridging study before the evaluation based on the bridging concept. For individual cases, it is recommended to consult with PMDA in advance.

See the answer to the question #11 in the Questions and Answers of the ICH E5 Guideline ("Ethnic Factors in the Acceptability of Foreign Clinical Data"; Administrative Notice from the Evaluation and Licensing Division, Pharmaceutical and Safety Bureau, Ministry of Health, Labour and Welfare, dated October 5, 2006) for points to consider in conducting a global clinical trial designed as a bridging study.

# 2. General points to consider for global clinical trials

(5) What are the points to consider in planning Japanese clinical development strategies and a

An important point to consider a clinical development plan of a drug is to streamline and optimize the development process and protocols for subsequent phases during the course of drug development based on thorough and appropriate evaluation of data available so far, while developing a long-term and overall plan. Continuous consultation with PMDA

protocol of a Japanese study in the trend of globalization of drug development?

is recommended from an early stage.

In the trend of globalization, global drug development may often be considered. It is recommended that coordination and cooperation with relevant foreign sections of the drug company be established and maintained regardless of the type of drug development strategy. The coordination and cooperation with relevant foreign sections include not only the conduct of a global clinical trial itself, but also involvement in protocol development, timely sharing of protocol and efficacy/safety data, and periodic correspondence regarding pharmaceutical regulatory affairs even in a case clinical trial is independently conducted in a foreign country or Japan.

In other words, considerations based on accurate understanding and sharing of up-to-date data of a certain drug while cooperating with relevant foreign sections from an early stage will be the key to planning efficient and optimal drug development. To ensure appropriate drug development planning to obtain a marketing authorization in Japan, accumulation of data in Japanese subjects starting from an early, exploratory stage is recommended.

There are currently three major types of clinical development strategies in Japan or multiple countries including Japan: single-country development, bridging development to which foreign data are extrapolated, and global development including confirmatory global clinical trials. The types of global development with the involvement of Japan may be divided into world-wide development conducted in cooperation with geographically distant countries such as the U.S. and European countries, and East Asian global development conducted in East-Asian countries such as Japan, China and South Korea. The characteristics of different development strategies should be thoroughly considered to develop an optimal protocol for the subsequent development phase based on the properties of the investigational drug and data available at the moment.

(6) What are the points to consider in evaluating the results of a global clinical trial?

The patient demographic information, efficacy, and safety should be evaluated in the same process as that used for a domestic study in Japanese subjects in principle. The consistency of the results between an overall study population and Japanese population based on sub-analysis should also be evaluated. It is important to consider the possibility that the Japanese population is a subgroup of the study and the sample size of the Japanese is generally insufficient to achieve the study objective, as well as the possibility that different results among different ethnic populations could be observed. When evaluating the data of a Japanese subgroup, the precision of the point estimate (e.g., standard deviation) should be taken into consideration as well as the point estimate itself based on the sample size of Japanese subjects. Furthermore, in addition to the evaluation of data in a Japanese subgroup for the primary endpoint, the results for the secondary endpoints in a Japanese subgroup should be evaluated to confirm a consistency with the results of primary endpoint and

study population and a Japanese subgroup should be determined. If any difference is identified, whether the data from the global clinical trial can support the efficacy and safety of the drug in Japanese patients should be carefully evaluated based on thorough consideration of the reason for the difference by utilizing relevant data such as results of subgrout analysis for individual factors.  The results of evaluation and discussion should be included in the Common Technical Document (CTD).  The (intrinsic and extrinsic) ethnic factors described in the ICH E5 Guideline should be considered to appropriatel evaluate data from foreign studies?  In early phase pharmacokinetic studies in Japanese subjects that usually enroll healthy adult volunteers, intrinsic ethnic factors such as genetic factors, rather than the local medical environment, are more important for the evaluation of study data. While extrinsic ethnic factors such as the living environment (e.g., diet) should be considered, data from foreign studies in Japanese subjects living outside of Japan are generally acceptable for the pharmacokinetic evaluation in the Japanese population.  On the other hand, in studies to evaluate the efficacy and safety of a drug, extrinsic ethnic factors such as the local clinical practice (e.g., diagnostic methods and standard treatment) and social factors including education and culture extend in the Japanese population should be examined in the Japanese medical environment, i.e., based on the data from clinical studies (global clinical trials of domestic studies in Japan) that appropriately enroll Japanese subjects living in Japan.  In general, interethnic pharmacokinetic (PK) comparison is recommended to be based on data collected according to consider in comparing pharmacokinetic data between different ethnicities?  Regarding the evaluation of PK similarities and differences among different ethnicities based on PK data from the extrinsic ethnicities and differences among different ethnicities based on PK data from the		
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Ethnic Differences in Drug Responses based on the Statement of Japanese, Chinese, and Korean Health Ministers]; The		Ethnic Differences in Drug Responses based on the Statement of Japanese, Chinese, and Korean Health Ministers]; The

report of Kawai Study Group). Differences in measurement methods, specifically, clinical trial design, subject selection, quantitative tests (including validation status and detection limits), measurement time points, treatment condition, doses and dosage forms of the investigational drugs, standard deviations (including outliers), and timing of the study should be carefully evaluated. If differences are observed, the possible effect of the difference and its degree in the evaluation should be thoroughly examined before comparing data from multiple independent studies (bioequivalence should also be evaluated if different formulations are used).

If no PK data are available from Japanese and non-Japanese subjects included in studies conducted under the same protocol, collection of PK data is recommended for parameters (e.g.,  $C_{max}$  and trough level) appropriate in consideration of the characteristics of the drug at least at several time points in the major ethnic groups to be included in a confirmatory trial, at least before initiating a global confirmatory trial.

(9) What are the points to consider in conducting a phase I (First in Human) trial as a global clinical trial?

Active participation of Japan in global clinical trials from phase I with international cooperation is beneficial to collect useful information such as tolerability and pharmacokinetic data of Japanese subjects at an early stage without delaying the development schedule in Japan.

When conducting a phase I trial as a global clinical trial, however, the safety of subjects in all participating countries and regions should be ensured, and adverse events that occurred at a study site and other practical concerns related to the trial should be immediately and appropriately shared among all study sites. Thus, whether to conduct a phase I trial as a global clinical trial should be determined based on comparisons of expected advantages and disadvantages of a global clinical trial with those of a domestic clinical trial.

Moreover, since a phase I trial generally intends to evaluate the treatment tolerability in humans in a small sample size, only limited information and data can be obtained for the evaluation of ethnic similarities and differences in pharmacokinetics and pharmacodynamics. Therefore, interethnic comparison of data from a phase I trial as a global clinical trial will be recognized as an exploratory purpose.

When taking above into consideration, it is appropriate to enroll Japanese subjects in the subsequent phases of the global clinical trial to further evaluate the effect of ethnic factors on the efficacy and safety of the drug. A separate clinical pharmacology study may be required when a marked interethnic difference may exist.

(10) When only a monotherapy study of an investigational drug was conducted in Japan, is it possible In principle, data of the investigational drug in Japanese subjects who received the combination therapy with Drug A should be available before the participation in a global clinical trial. However, a global clinical trial investigating a combined use of the investigational drug may be conducted without data of its combination therapy with Drug A in

for the drug to be used in an exploratory global clinical trial including Japan investigating its combined treatment with Drug A?

Japanese subjects, if both of the following conditions are met: (a) based on results from foreign clinical trials or other studies, no increase of safety risks is expected when Drug A is used with the investigational drug and other drugs possibly used in the global clinical trial, and (b) the dose of Drug A has been used in patients in Japan for a certain period and its safety has already been established.

For individual cases, it is recommended to consult with PMDA based on the scientific data and information available at the time.

(11) If the blood concentration of an investigational drug is different Japanese between non-Japanese subjects (drug concentration in the Japanese is higher or lower than that in non-Japanese), is it acceptable to conduct an exploratory dose response trial as a global clinical trial including Japanese subjects, assuming that a certain number of Japanese subjects is enrolled and the safety evaluation is performed based on the drug safety profile minimum and results examinations global in the clinical trial?

Whether to enroll Japanese subjects in an exploratory dose response trial as a global clinical trial when the pharmacokinetic data are markedly different between Japanese and non-Japanese subjects needs to be determined after thoroughly evaluating the mechanism of and reason for the difference, taking into consideration that the recommended clinical dose may potentially be different, and carefully comparing the advantage and disadvantage of a global clinical trial with those of a domestic clinical trial in Japan.

For example, when the blood concentration of the investigational drug is higher in the Japanese population than that in non-Japanese populations, enrollment of Japanese subjects in a global exploratory dose response trial will be acceptable if the tolerability to the investigational drug in Japanese subjects has been confirmed based on the phase I trial and thorough safety measures will be taken in the global trial. In some cases, special safety monitoring in Japanese subjects may be required to adequately respond to adverse reactions.

An appropriate range of study doses should be selected to include the recommended clinical doses in each ethnic group enrolled in the study based on thorough evaluation of existing data on pharmacokinetics and pharmacodynamics in Japanese and non-Japanese populations. It is appropriate that the sample size of Japanese subjects is determined according to the answer to question #6 in "Basic Principles on Global Clinical Trials" (PFSB/ELD Notification No. 0928010, dated September 28, 2007). However, the recommended clinical dose may be different between Japanese and non-Japanese patients when their pharmacokinetic profiles are markedly different. In such a case, the estimation of sample size is recommended to be conservative enough to thoroughly evaluate the dose response relationship in Japanese subjects while taking into consideration the study feasibility.

(12) If a drug has not been approved in Japan, is it acceptable to avoid assigning the drug as an active control to Japanese subjects in an

A global clinical trial should be conducted under the same condition that allows appropriate comparison of data from all participating countries and regions in the light of the study objective. A protocol should not include an active control group different from other participating countries only for Japanese subjects. Refer to the answer to question #9 in "Basic Principles on Global Clinical Trials" (PFSB/ELD Notification No. 0928010, dated September 28, 2007), describing that

exploratory study (use of an active control without assuring a statistical power for superiority or non-inferiority)?

the use of an unapproved drug as a control is acceptable if the drug is internationally established.

The sponsor should obtain information on the control drug from package inserts in foreign countries and published literature to the extent possible and submit the information before initiating the trial. The sponsor should also establish a system to continuously collect and report safety information of the investigational drug as well as the control drug. In order to establish a system and procedures to exchange safety information on the control drug unapproved in Japan, the sponsor is recommended to consult with the relevant company which has the marketing authorization for the control drug in other countries in advance.

(13) What are the points to consider when the active ingredient of the active control drug has been approved in Japan and foreign countries but the dosage regimen or formulation is different?

A standard drug which is widely available is generally used as an active control to compare its efficacy and safety with those of the investigational drug. In general, the dosage regimen of the drug used as an active control in a global clinical trial is recommended to be within the range approved in the participating countries and regions. To ensure scientifically appropriate evaluation, the same dosage regimen should be used for the control drug in the participating countries and regions.

However, the dosage regimen of a control drug may be different among the participating countries and regions in reality. The potential effect of the difference on the efficacy and safety should be thoroughly evaluated in advance. For example, if the approved dosage of the control drug is different between Japan and other countries, the reason for and background of the different dosage should be reviewed to evaluate the potential effect on the efficacy and safety. Specifically, different dose titration design may affect the early drop-out rate, and different maximum doses may affect the incidence of adverse reactions. For different formulations, the reason for and background of approval in the participating countries and regions should be reviewed, and the effect of different formulation on the dissolution profiles and blood drug concentration should be evaluated. The effect of using different dosage regimens or formulations in a study on the maintenance of blindness should also be evaluated.

If such difference is expected to seriously affect the efficacy and safety, use of the drug as the control should be avoided. Conduct of a clinical trial in countries and regions where the dosage regimen and formulation approved in Japan can be used or use of other drug as the control should be considered.

In some cases, if the dosage regimen has not been approved in Japan but recognized by international textbooks and medical guidelines and widely accepted in the Japanese clinical practice, the study dosage regimen may be determined in line with the internationally accepted dosage. For individual cases including the handling of the control drug, it is recommended to consult with PMDA.

(14) If a drug with different indications or dosage regimen depending on countries is used in combination with the investigational drug, can a global clinical trial be conducted?

The indications and dosage regimen of a concomitant drug may be different among countries and regions participating in a global clinical trial depending on the local clinical practice. The effect of the difference in the concomitant drug on the efficacy and safety of the investigational drug should therefore be thoroughly evaluated before selecting participating countries and regions.

The dosage regimen of the concomitant drug in a global clinical trial should be consistent among the participating countries if the drug is likely to affect the efficacy and safety of the investigational drug, the concomitant use is unavoidable for the efficacy and safety evaluation of the investigational drug, and the prescribing information of the investigational drug needs to clearly specify the indications and dosage regimen of the concomitant drug (e.g., combination anti-cancer chemotherapy).

When the indications or dosage regimen of the drug used in combination with the investigational drug is different among participating countries and region, a global clinical trial in the countries and regions can be still feasible, if such combination is not necessarily required but determined according to the patient's condition (e.g., hypnotics used in a study of depression), and if it can be explained based on a scientific rationale that the efficacy and safety of the investigational drug is not markedly affected. In such a case, however, the condition of the study should be consistent among the countries to the extent possible (e.g., dose change of concomitant drug is prohibited) to minimize the effect on the evaluation. Details and timing of treatment should be documented to allow later subgroup analyses to evaluate the effect of difference in use of the concomitant drugs on the efficacy and safety of the investigational drug.

(15) If the subject registration for a global clinical trial using a competitive registration system is completed before the target sample size of Japanese subjects is achieved, is a separate study in Japan required?

As stated in the answer to question #6 in "Basic Principles on Global Clinical Trials" (PFSB/ELD Notification No. 0928010, dated September 28, 2007), the sample size of Japanese subjects to be enrolled in a global clinical trial should be determined to ensure the data consistency between the overall study population and the Japanese subgroup. Thorough assessment should be made in advance to achieve the originally determined sample size of Japanese subjects, and appropriate actions should be taken as necessary to achieve the objective based on careful monitoring of study progression.

If the target sample size cannot be achieved despite every possible action, however, the sponsor should review the actions taken, the reason for the failure to achieve the sample size, and the data of overall study population and Japanese subgroup to determine whether the data consistency is demonstrated.

A separate study may be required if data comparison between the overall study population and the Japanese population is difficult due to an extremely small number of enrolled Japanese subjects, or the data of overall study

population and Japanese subgroup are inconsistent, suggesting ethnic differences and safety concerns. For individual cases, it is recommended to consult with PMDA. What are the points to consider A large-scale clinical trial in thousands of subjects or more using a true endpoint such as survival time is often (16)in participating in a large-scale designed as a global clinical trial because of expected time required for case accumulation and other reasons. While global clinical trial using a true Japan may contribute to establishment of evidence based on the true endpoint by participating in such a study, adequate endpoint such as survival time? sample size of Japanese subjects may not be achieved to evaluate the data consistency between the overall study population and the Japanese population, considering the large study scale and the number of participating countries and regions. Therefore, the sponsor should assess whether the overall study population including Japanese subjects can be deemed as a single population, based on thorough review of data on previously used endpoints, the association between the previous endpoints and the true endpoint, and the effect of international and interregional ethnic differences. Two ways to determine a target sample size of Japanese subjects are described in the answer to question #6 in "Basic Principles on Global Clinical Trials" (PFSB/ELD Notification No. 0928010, dated September 28, 2007). However, the proposed sample size determination is intended to be used for studies enrolling hundreds of subjects, and may be difficult to apply to larger-scale studies. While no established method of sample size determination is available for any study scale, in a large-scale study enrolling thousands of subjects or more, the use of a surrogate endpoint is an option to calculate minimum sample size of Japanese subjects for consistency evaluation, if the surrogate requires smaller sample size for evaluation and is reasonably associated with the primary endpoint (a true endpoint such as survival rate). In this case, the practical enrollment of Japanese subjects as many as possible over the minimum sample size is encouraged. Endpoints used in previous phase studies should be used as secondary endpoints in the protocol in addition to the endpoint used for sample size determination. Evaluation should be made not only based on the comparison of the primary (true) endpoint between the Japanese subgroup and the overall study population but also the secondary endpoints. Based on the information obtained from the clinical trial and the drug development program, whether the data of overall study population can be applied to the Japanese population should be explained. How many Japanese patients In the trend of globalization of drug development, active participation of Japan in global clinical trials is encouraged

(17) How many Japanese patients will be required for evaluating the long-term safety of a drug intended for long-term treatment of non-fatal disease, if

In the trend of globalization of drug development, active participation of Japan in global clinical trials is encouraged for efficient clinical development. However, when a drug is developed mainly based on global clinical trials, the total number of Japanese subjects included in the trial before the filing of the new drug application may be smaller than that in a case where the development is based on data from clinical trials conducted only in Japan. It potentially causes a problem in evaluating safety in the Japanese.

the data consistency has been shown between Japanese and non-Japanese subjects in a global clinical trial? The long-term safety should be thoroughly evaluated for a drug for long-term treatment of non-fatal diseases. In general, safety data should be collected from approximately 100 or more Japanese subjects who have been treated for 1 year. However, in case of difficulty in enrolling subjects, a safety evaluation using data from trials not satisfying such number of subjects may still be possible in some situations, such as when Japan has been continuously involved in global clinical trials from an early and exploratory stage of drug developments and the data from multiple studies has not demonstrated any marked difference in safety between the Japanese and non-Japanese subgroups or when the drug has been approved in Japan for other similar indications and sufficient post-marketing safety data of Japanese patients has not demonstrated any marked difference from non-Japanese subjects. For individual cases, it is recommended to consult with PMDA.