

# THE ETHICS AND REGULATORY SERVICE

Viviana Giannuzzi

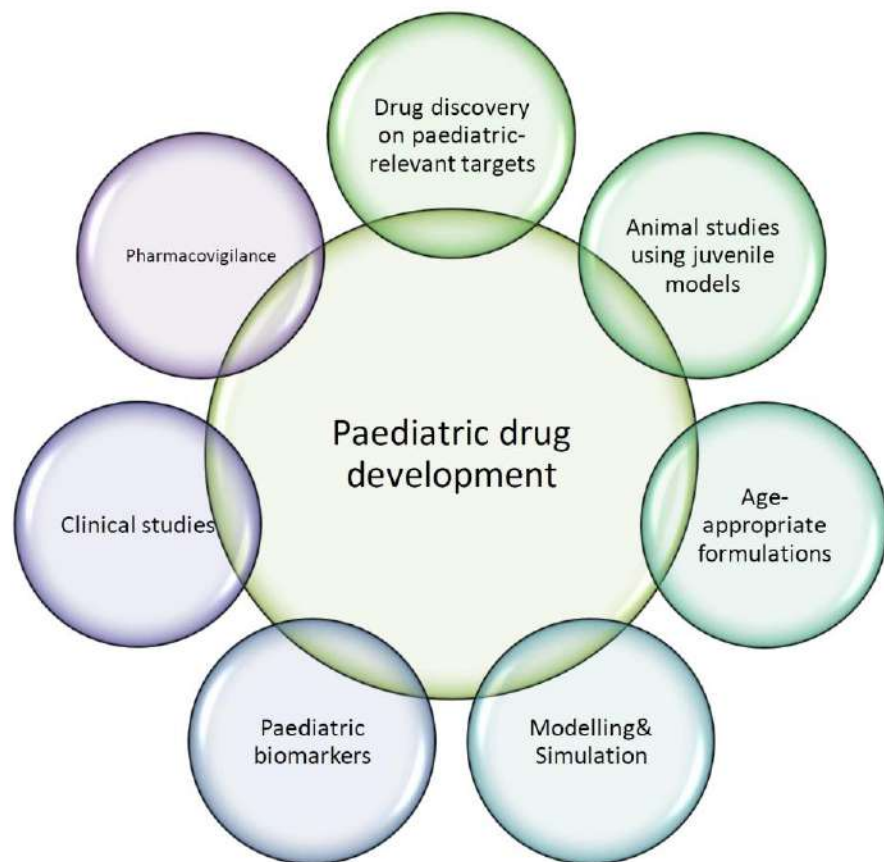
EPTRI General Assembly– Bari –18 July 2024

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*No financial disclosure to declare*

# Developing medicines for children



- Part of the population aged between birth and 18 years
- Subjects under the age of legal competence to give informed consent (according to the national law)

*Age category*



**Pre-term newborns**



**Newborns**  
27 days



**Infants & toddlers**  
28 days to 23 months

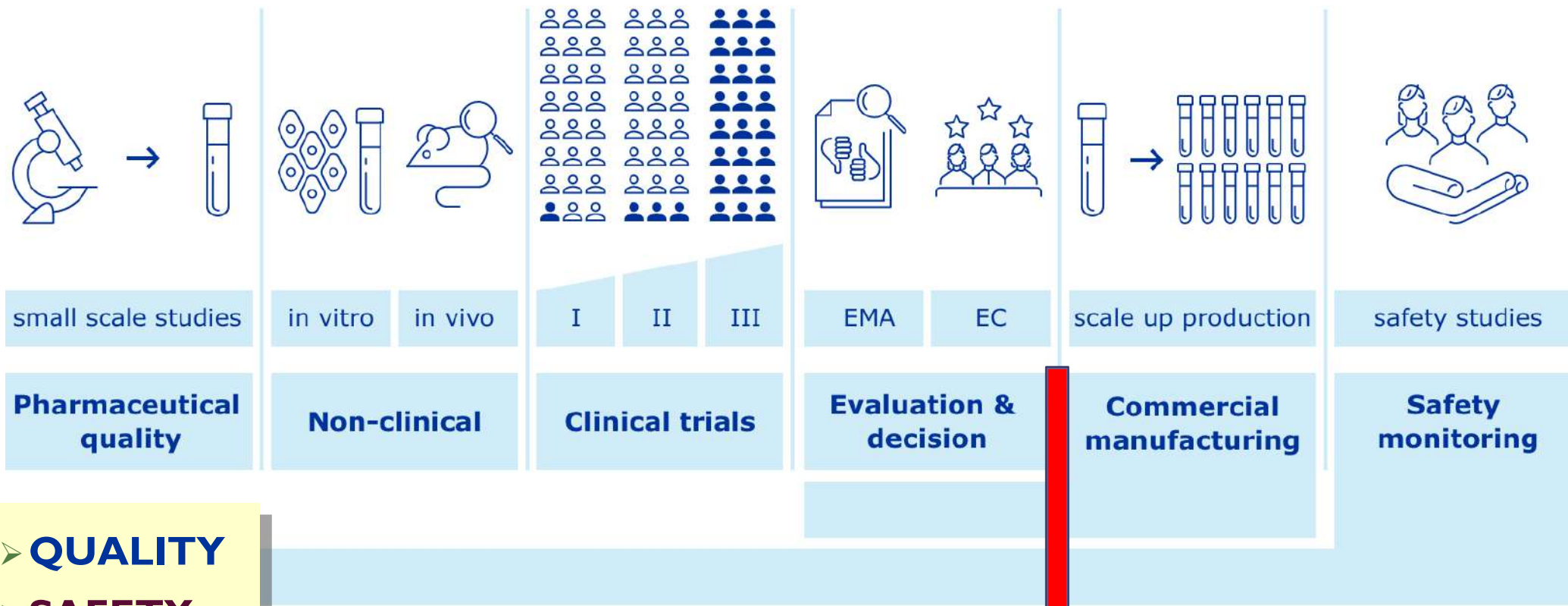


**Children**  
2 to 11 years



**Adolescents**  
12 to 17 years

# Developing medicines



*Academia  
more and  
more  
involved in  
R&D*

- **QUALITY**
- **SAFETY**
- **EFFICACY**

# Rules to comply with: the same as adults

**International Ethical Guidelines for Health-related Research Involving Humans**

Preparation Organization

World Health Organization



**REGULATION (EU) 2017/746 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
**of 5 April 2017**  
**on *in vitro* diagnostic medical devices and repealing Directive 98/79/EC and Commission Decision 2010/227/EU**  
 (Text with EEA relevance)

**WMA Declaration of Helsinki - Ethical Principles for Medical Research Involving Human Subjects**

**REGULATION (EU) 2017/745 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
**of 5 April 2017**  
**on medical devices, amending Directive 2001/83/EC, Regulation (EC) No 178/2002 and Regulation (EC) No 1223/2009 and repealing Council Directives 90/385/EEC and 93/42/EEC**  
 (Text with EEA relevance)


COUNCIL OF EUROPE  
 Committee of Ministers

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Related documents

Recommendation CM/Res(2016)6  
 of the Committee of Ministers to member States on research on biological materials of human origin (adopted by the Committee of Ministers on 11 May 2016 at the 126th meeting of the Ministers' Deputies)

**ADDITIONAL PROTOCOL TO THE CONVENTION ON HUMAN RIGHTS AND BIOMEDICINE, CONCERNING BIOMEDICAL RESEARCH**



Council of Europe Treaty Series - No. 195



**EUROPEAN MEDICINES AGENCY**  
 SCIENCE MEDICINES HEALTH

25.11.2014 Official Journal of the European Union L 337/1

II  
 (Non-legislative acts)

REGULATIONS

COMMISSION DELEGATED REGULATION (EU) No 1252/2014  
 of 28 May 2014  
 supplementing Directive 2001/83/EC of the European Parliament and of the Council with regard to principles and guidelines of good manufacturing practice for active substances for medicinal products for human use  
 (Text with EEA relevance)

(Legislative acts)

**REGULATIONS**

**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)

1 December 2016  
 EMA/CHMP/ICH/135/1995  
 Committee for Human Medicinal Products

**Guideline for good clinical practice E6(R2)**  
 Step 5

L 119/1



**EUROPEAN MEDICINES AGENCY**  
 SCIENCE MEDICINES HEALTH

22 July 2021  
 EMA/CHMP/QWP/BWP/259165/2019  
 Committee for Medicinal Products for Human Use (CHMP)

**Guideline on quality documentation for medicinal products when used with a medical device**

2001L0083 — EN — 30.12.2008 — 006.001 — 1

This document is meant purely as a documentation tool and the institutions do not assume any liability for its contents


► **DIRECTIVE 2001/83/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
**of 6 November 2001**  
**on the Community code relating to medicinal products for human use**  
 (OJ L 311, 28.11.2001, p. 67)

**REGULATIONS**

**REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
**of 27 April 2016**  
**on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)**



# Rules to comply with: the same as adults + further more




European Medicines Agency

London, 24 January 2008  
Doc. Ref. EMEA/CHMP/SWP/169215/2005

COMMITTEE FOR HUMAN MEDICINAL PRODUCTS (CHMP)

GUIDELINE ON THE NEED FOR NON-CLINICAL TESTING IN JUVENILE ANIMALS OF PHARMACEUTICALS FOR PEDIATRIC INDICATIONS

*Non-clinical studies*



EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

1 September 2017  
EMA/CPMP/ICH/2711/17  
Committee for Human Medicines

INTERNATIONAL COUNCIL ON HARMONISATION OF TECHNICAL REQUIREMENTS FOR PHARMACEUTICALS FOR HUMAN USE

ICH HARMONISED GUIDELINE  
ADDENDUM TO ICH E11: CLINICAL INVESTIGATION OF MEDICINAL PRODUCTS IN THE PEDIATRIC POPULATION  
E11 (R1)

ICH E11(R1) medicinal products Step 5

*Clinical trials*

**Ethical considerations for clinical trials on medicinal products conducted with minors**

Recommendations of the expert group on clinical trials for the implementation of Regulation (EU) No 536/2014 on clinical trials on medicinal products for human use


18 September 2017

*Ethical Recommendations*

**Annex 2**

**FIP-WHO technical guidelines: Points to consider in the provision by health-care professionals of children-specific preparations that are not available as authorized products**

*Formulations*




European Medicines Agency

London, 28 July 2006  
EMA/CHMP/PEG/194810/2005

COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE (CHMP)

REFLECTION PAPER: FORMULATIONS OF CHOICE FOR THE PAEDIATRIC POPULATION



European Medicines Agency

London, 28 June 2006  
Doc. Ref. EMEA/CHMP/EWP/147013/2004/Corr

COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE (CHMP)

GUIDELINE ON THE ROLE OF PHARMACOKINETICS IN THE DEVELOPMENT OF MEDICINAL PRODUCTS IN THE PAEDIATRIC POPULATION



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Home regulatory > Human regulatory > Scientific guidelines > Multidisciplinary > Paediatrics

Scientific guidelines: paediatrics

This page includes the European Medicines Agency's scientific guidelines that are specifically relevant to the development of medicines for children.

Information of paediatric relevance may also be included in general or disease-specific guidelines, not listed here. For a complete list of these documents, see Scientific guidelines.

For a complete list of scientific guidelines currently open for consultation, see Public consultations.

- Quality
- Non-clinical
- Clinical efficacy and safety
- Other

*Specific areas*




EUROPEAN MEDICINES AGENCY  
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1 August 2013  
EMA/CHMP/QWP/005800/2013 Rev. 2  
Committee for Medicinal Products for Human Use (CHMP)  
Paediatric Committee (PCO)

Guideline on pharmaceutical development of medicines for paediatric use

*Pharmaceutical development*



European Medicines Agency  
Evaluation of Medicines for Human Use

London, 25 June 2009  
Doc. Ref. EMEA/536810/2008

COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE (CHMP) AND PAEDIATRIC COMMITTEE (PCO)

GUIDELINE ON THE INVESTIGATION OF MEDICINAL PRODUCTS IN THE TERM AND PRETERM NEONATE

*Neonates*

# Ethics issues in biomedical research

1. Human embryos & fetuses
2. Human beings
3. Human cells or tissues
4. Personal data
5. Animals
6. Non-EU countries
7. Environment, health & safety
8. Artificial Intelligence
9. Other ethics issues



# Paediatric ethical requirements to be fulfilled

- Involvement of minors in the informed consent process according their age and mental maturity
- Separate documents for adults and children
- Assent & agreement
- Trials with female adolescents - *information and inclusion with the use of contraception*
- Insurance contracts not limiting the liability period to consider long-term effects

## **Ethical considerations for clinical trials on medicinal products conducted with minors**

Recommendations of the expert group on clinical trials for the implementation of Regulation (EU) No 536/2014 on clinical trials on medicinal products for human use

Revision 1

18 September 2017

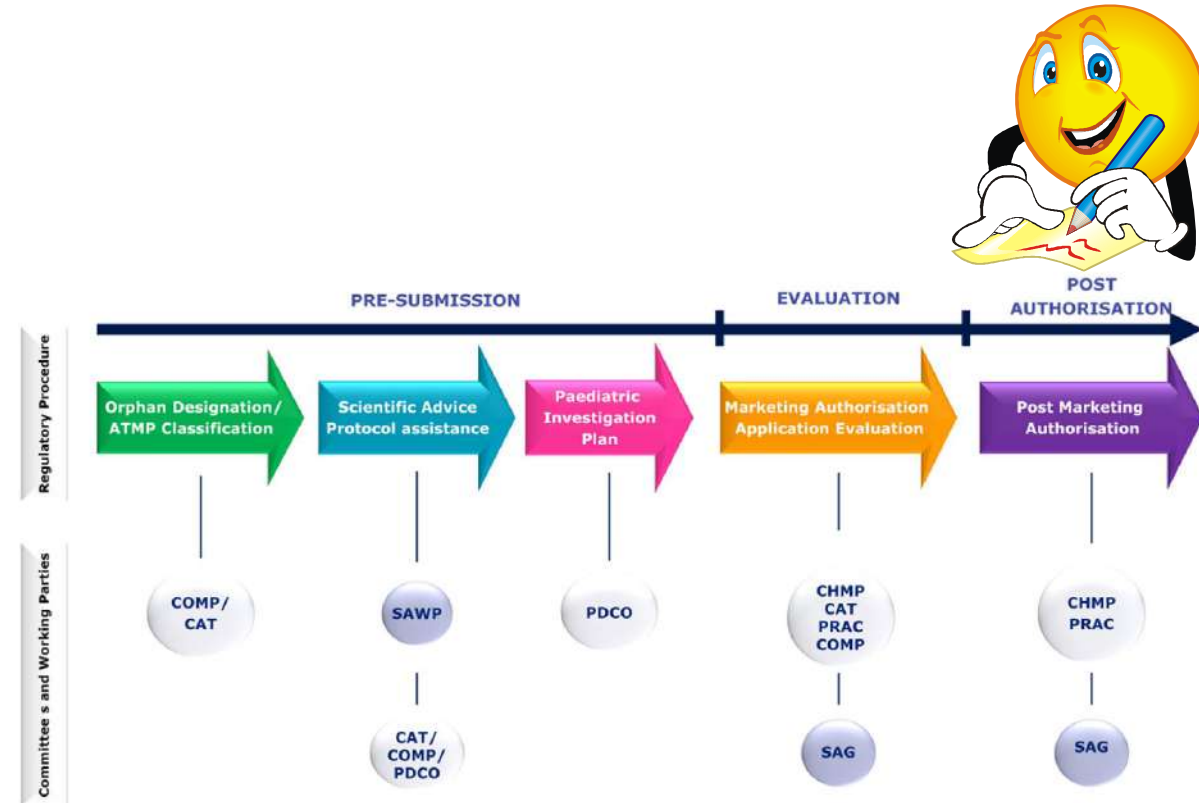


*How EPTRI can provide ethics and regulatory support?*

# 1. EMA regulatory procedures for medicines of paediatric interest

Preparation of

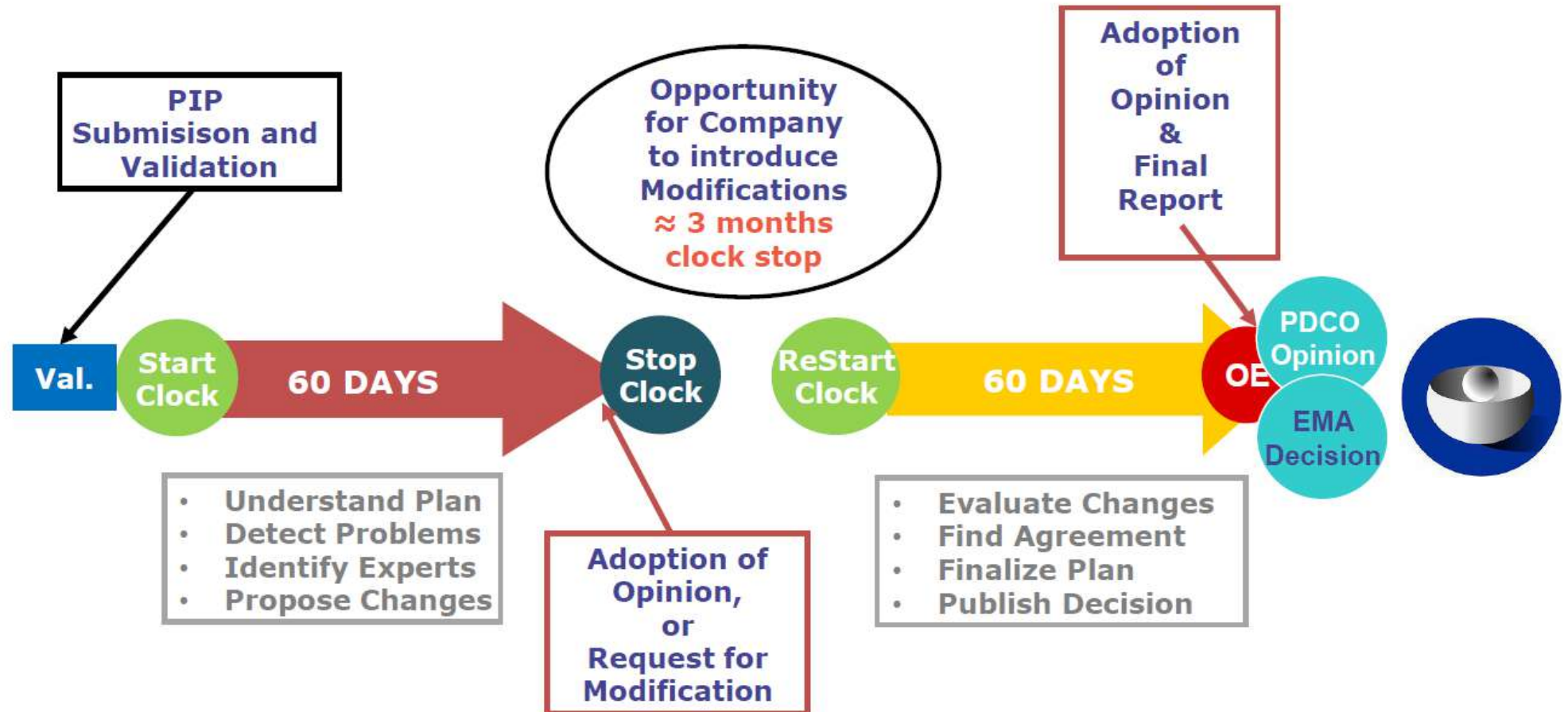
- Paediatric Investigational Plan
- Orphan Designation
- Scientific Advice/Protocol Assistance including the Qualification procedure
- other EMA voluntary procedures
- Paediatric Marketing Authorisation Application



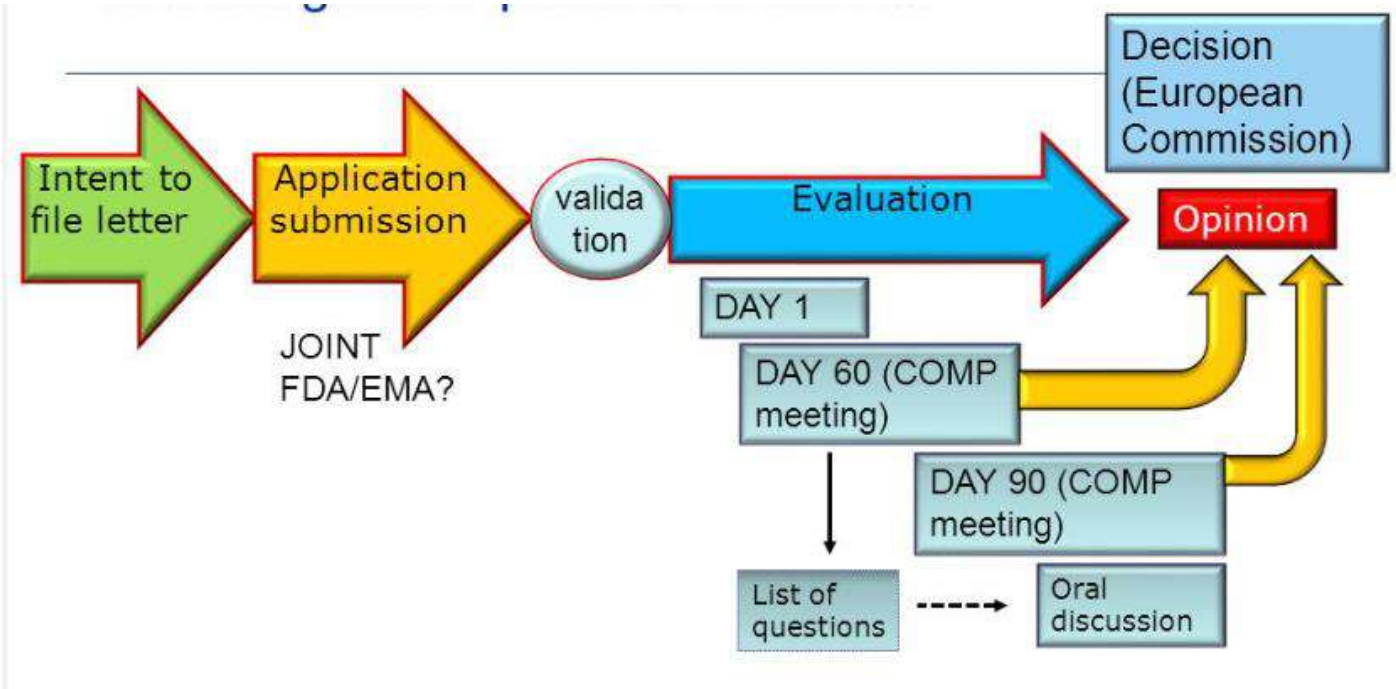
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# Paediatric Investigation Plans (PIPs)

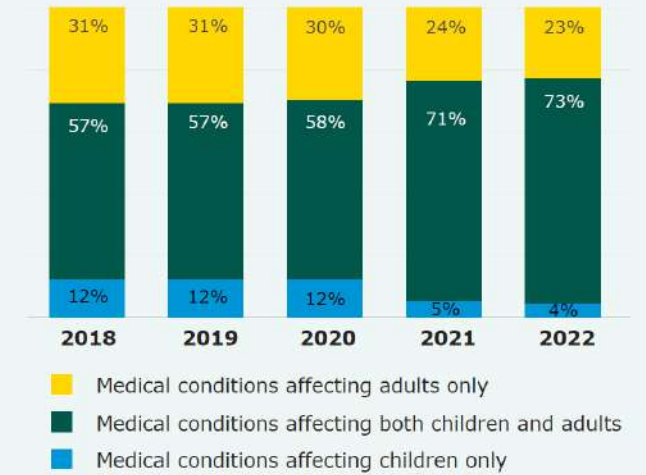
*studies and analyses providing evidence on the use of medicines in all paediatric ages*



# Orphan Designations



Designated orphan medicines for the treatment of children and adults



EMA Annual Report 2022

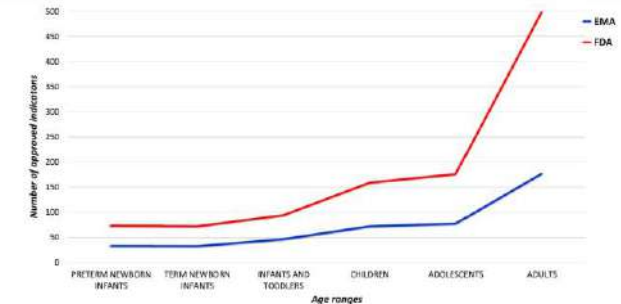


Fig. 5 Distribution of indications in the EU and US per age groups. Legend: label not available for 7 ODDs

Giannuzzi V et al. OJRD 2017

# Scientific Advice/Protocol Assistance

- Guidance on the best methods and study designs (clinical aspects, methodological issues)
- Responding to specific questions
- For orphan medicines ⇒ protocol assistance



- Acceptability of specific use of proposed innovative methods/tools not yet integrated in medicines R&D and clinical management, based on assessment of submitted data

# Lots of things to do...



## OPEN ACCESS

EDITED BY  
Daniel O'Connor,  
Association of the British Pharmaceutical  
Industry (ABPI), United Kingdom

REVIEWED BY  
Maria Elzbieta Sheeran,  
European Medicines Agency, Netherlands  
Lawrence Liberti,  
University of Southern California,  
United States

\*CORRESPONDENCE  
Viviana Giannuzzi  
✉ vg@benzifoundation.org  
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Innovative research  
methodologies in the EU  
regulatory framework: an analysis  
of EMA qualification procedures  
from a pediatric perspective

Viviana Giannuzzi<sup>1\*</sup>, Arianna Bertolani<sup>2,3</sup>, Silvia Torretta<sup>3</sup>,  
Giorgio Reggiardo<sup>2</sup>, Eleonora Toich<sup>2</sup>, Donato Bonifazi<sup>2,3</sup> and  
Adriana Ceci<sup>1,3</sup> on behalf of the European Paediatric  
Translational Research Infrastructure (EPTRI)

## Paediatric interest

Disease or medicinal product addressed in a PIP  
Methodology already applied/used in paediatric  
studies (*clinicaltrials.gov, literature*)

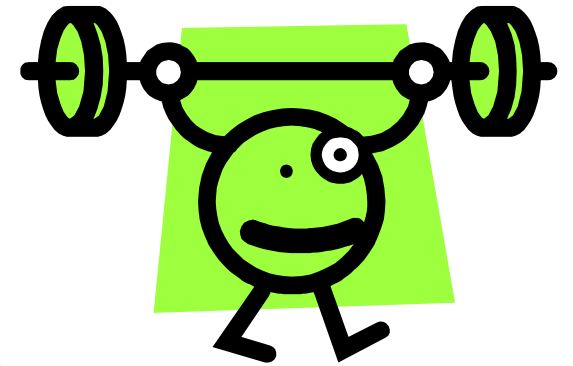


**70%** qualified methodologies (19/27) potentially of interest  
for paediatric patients

**Only 6** (22%) had paediatric data in the submission dossier

# EMA applications for innovative medicines & unmet needs

- **Innovation Task Force (ITF) briefing meetings:** early dialogue with applicants (SMEs, academics, researchers) on innovative aspects in medicines development ⇒ informal exchange of information and guidance
- **PRIME:** priority medicines designation for early and proactive support to SMEs and academia to develop medicines targeting conditions with unmet medical needs

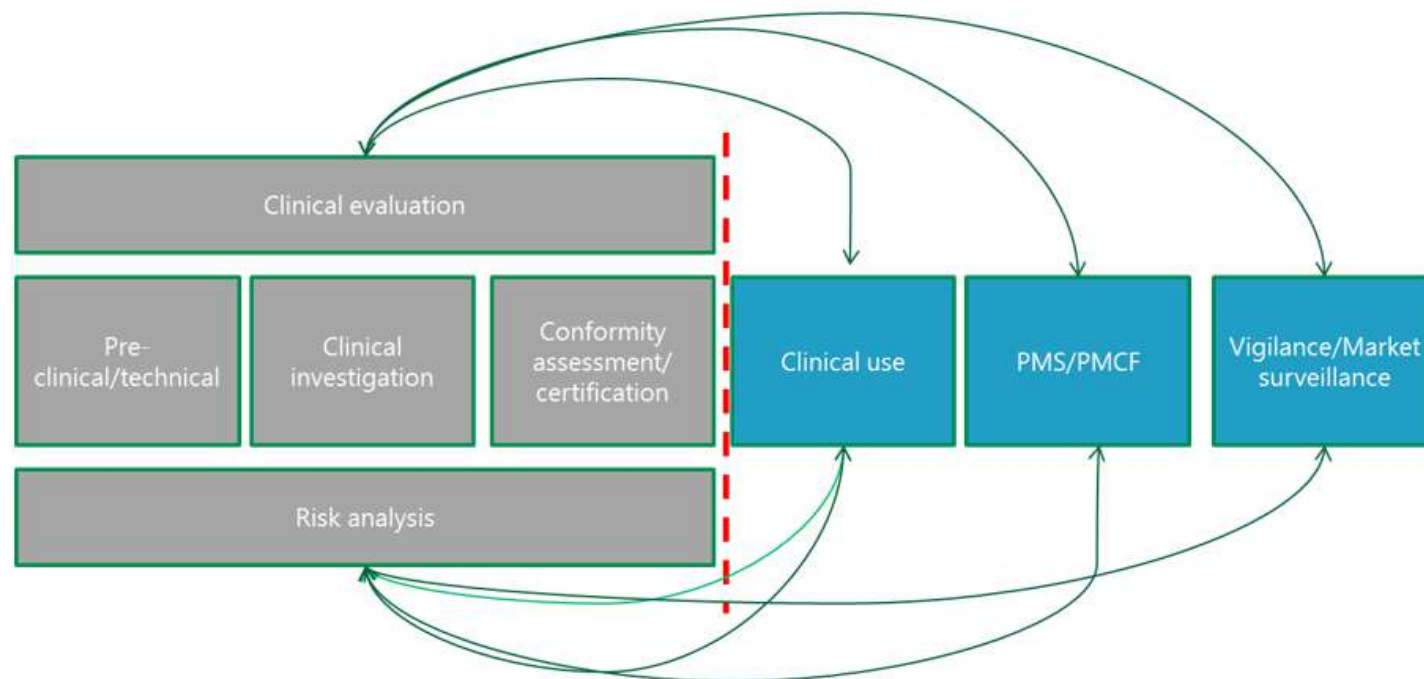


## 2. Advice on regulatory procedures for medical devices of paediatric interest

Preparation and submission of documents for

- clinical study
- CE mark
- medical devices classification
- MA

applications

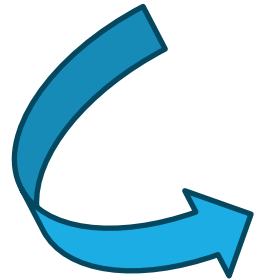


*Source: Training of members of Commission's expert panels on medical devices and in vitro diagnostic devices (EXPAMED), 2020*



### 3. Support for the implementation of ethical requirements

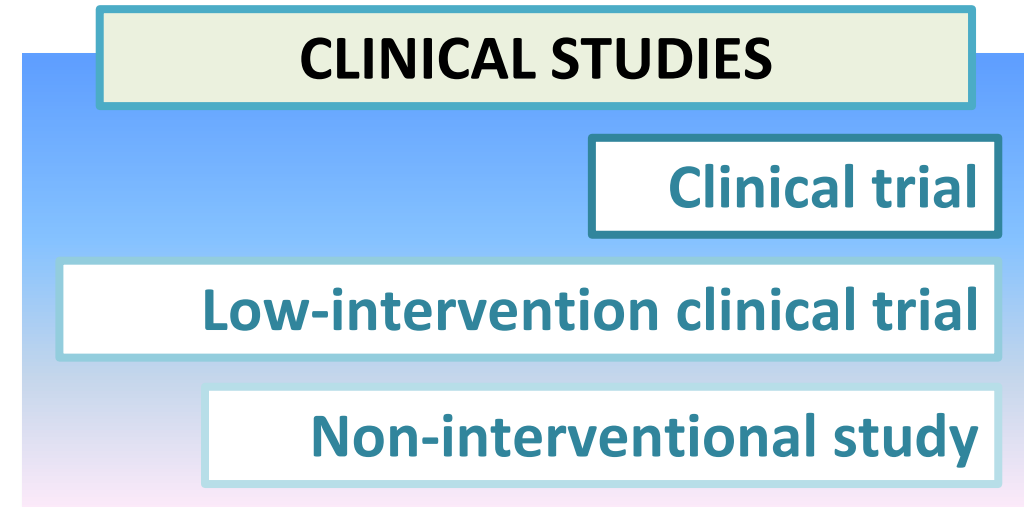
- Ethics revision of paediatric clinical study protocols
- Preparation of documents for informed consent and assent
- Advice on the implementation of GDPR provisions



- implement the proper ethical requirements to perform paediatric research
- compliant with EU internationally-agreed provisions

# Preparing paediatric study protocol

- Non-clinical and clinical data supporting a paediatric use
- Design feasibility
- Use of placebo under stricter conditions
- Balance of expected benefit versus risks
- Evidence of direct benefit for child/group
- Age-appropriate scales or measures of endpoints
- Study risks, pain, fear and discomfort
- Appropriate pharmacovigilance procedures



# Preparing material for informed consent

- Information sheet + consent form
- 2 separate information and signatures for:



Genetic tests



Personal data processing



Signed and dated by legally designated representative(s) and study personnel performing the interview and giving study information

# Preparing material for informed assent

- Tailored for age groups
- Appropriate language and format



## Assent/informed consent guidance

Symbol	Description
	Does not have to be included in the assent/agreement/informed consent process for this age group
	Should be included and discussed during the assent/agreement/informed consent process for this age group
	May be included/optional to include in the assent/agreement/informed consent process for this age group

Trial specific information for informed consent and assent (agreements)						Elements to consider/information which must be included into the assent/consent document	Questions to be addressed	Notes and example methods/texts to be used
Age group in years								
0-2	2-5	6-9	10-18	Legal representative(s)				
					Title/topic of the trial/introduction/purpose of the trial/size of the trial (how many patients/participants, how many sites)	<ul style="list-style-type: none"> <li>▶ What is the purpose of this trial?</li> <li>▶ Why is this trial needed?</li> <li>▶ Is there information about this trial available somewhere?</li> </ul>	NOTE: EUCTR number and trial protocol code must be added. The trial must be registered in the official Trial Registry (EudraCT) before the start of the trial. Additionally, in other registries or websites according to national requirements.	
					Possible future effects (infertility, birth defects, miscarriage)	<ul style="list-style-type: none"> <li>▶ Can the trial medication or treatments have some effect on the fetus via mother or father, in case of the child/adolescent's pregnancy/child/adolescent's girlfriend's pregnancy?</li> <li>▶ What happens if this situation occurs?</li> <li>▶ Who will be told about this?</li> </ul>	NOTE: Information about the potential teratogenic risks during pregnancy/fertility (both females and males) should be discussed, and also the possibility to use contraception, and what type of contraception should be used if it is required. Explain what should happen if pregnancy arises during the trial.	
					Participation/recruitment/child/adolescent selection	<ul style="list-style-type: none"> <li>▶ Why has the child/adolescent been invited to participate in this trial?</li> </ul>		



**Viviana Giannuzzi**

PharmD, PhD

[vg@benzifoundation.org](mailto:vg@benzifoundation.org)



FONDAZIONE

PER LA RICERCA FARMACOLOGICA

**GIANNI BENZI**

ONLUS