Dear Sir or Madam,

I am writing as the Project Coordinator of XENOME, the EU FP6 Integrated Project on xenotransplantation [contract # LSHB-CT-2006-037377].

After a careful reading of the Draft detailed guidelines on Good Clinical Practice specific to Advanced Therapy Medicinal Products, we have prepared the following comments that represent the content of intense discussions between some of the investigators in Xenome.

- we are concerned that the responsibility of conducting the study according to the highest GCP standards is prevalently delegated to the investigators or the sponsors. We are left under the impression that industry is driving the game in an independent manner and that there is NO tight, unbiased and "centralized" monitoring. Quite frankly, public health issues cannot be delegated to the good will or diligence of companies. Indeed, this is NOT satisfactory.
- Traceability is an important issues but, for xenotransplantation, sample archiving and longterm follow up is at least as important. In this light, it is mandatory to provide a detailed plan to ensure longterm clinical follow up and samples archiving. What happens if the sponsors goes bankrupt?
- Also longterm follow for xenotransplantation should NOT be determined by the sponsor as stated in 2.4.2. Current views are that **lifelong monitoring** is requested!
- Furthermore, it is currently considered that such monitoring should regards the patients BUT ALSO his/her close contacts! (and this should be specified in the document!).
- Also, in 2.4.1, it is stated that "*The competent authority of the Member State concerned by a serious adverse reaction occurring in a clinical trial with an ATIMP containing human cells or tissues or a combined ATIMP, should inform the relevant national authorities responsible for…".* Shouldn't this even more so apply if the ATIMP contains **animal** cells?
- Finally, in the case of xenotransplantation, clinical records should be kept for AT LEAST 10 YEARS (section 2.10)
- EMEA was expected to deliver the updated "Points to consider" on xenogeneic cell on the first quartile 2008. However, it seems to us that the document has not been released as yet, and the public consultation talks about xeno cells still referring to the document of 2003.

I hope that these constructive comments will be of help to improve the document. In any case, please let me know if I may be of any further assistance.

With kind regards,

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