Comments to the Draft Document
HARMONISED REQUIREMENTS FOR NON INVESTIGATIONAL MEDICINAL PRODUCTS IN CTA SUBMISSIONS (SANCO/C/8/SF/dn D(2010) 326199)

This document will be very helpful in clarifying also recent challenges the Nuclear Medicine community has faced in conducting clinical trials (CTs) with radiopharmaceuticals, very often in an academic context. As a general comment regarding trials with pharmaceuticals in general, we wanted to point out a few considerations regarding the use of radiopharmaceuticals in particular, which culd be helpful in conducting CTs with this special group of drugs and may be considered in the final version of the document:

1.) It is a limiting factor that any previous CT with an unlicensed product as a NIMP or an IMP is only useful in a subsequent trial if this CT was conducted in the same member state. It would be important in our view to widen this possibility to trials conducted within any other member state as well. We do not see a reason regarding safety or quality why this should be limited to the member state in which the previous CT was conducted.
2.) The release by an "appropriately experienced individual" leaves some open questions. For radiopharmaceuticals a special certificate has been initiated several years ago under the umbrella of the EANM, defining individuals being qualified for small scale preparation of radiopharmaceuticals. This initiative was set up as the preparation and proper release of radiopharmaceuticals requires highly specialized training and education not only in "regular" pharmaceutical issues. We would therefore propose to mention such special qualification, whether provided by the EANM or by a national authority, within the document regarding CTs performed using radiopharmaceuticals.
3.) The definition of "reference substance" as mentioned in the document leaves room for interpretation and classification as IMP, which seems outside the intention of this initiative. We thefefore propose a more clear definition of this term clearly stating that in CTs the "reference substance" should be seen as NIMP.
4.) The term "non-commercial" in our experience sometimes is interpreted very variably, we propose to include some clarification regarding this including the use in an academic environment, studies not aimed at gaining a marketing authorization and biomedical research applications. In this respect we also would propose to mention special conditions for small scale radiopharmaceutical preparations, that are done outside the industrial framework, especially regarding specific interpretations of GMP ("Compounding of radiopharmaceuticals"). A recent initiative of the EDQM on defining specific conditions for this practice underlines the importance of this issue.

We hope that these comments are useful in improving the current draft to help especially the Nuclear Medicine Community to be able to remain competitive in research and to strengthen the development of new radiopharmaceuticals for a variety of applications. Some of these points are also mentioned in an attached document summarizing the challenges of the current regulatory framework for CTs in Europe regarding the use of radiopharmaceuticals (e.g. regarding GMP and qualification of personnel).

Dr. Clemens Decristoforo
Chair, EANM Radiopharmacy Committee

Prof. Dr. Christer Halldin
Chair, EANM Drug Development Committee

Contact reference:
EANM Executive Secretariat
Hollandstrasse 14/Mezzanine
A - 1020 Vienna, Austria
Tel: +43-1-2128030, Fax: +43-1-21280309
e-mail: a.bauer@eanm.org, www.eanm.org