

Health Products and Food Branch

Your Health and Safety - Our Priority



Registration and Disclosure of Clinical Trial Information

CAPRA Symposium

November 27, 2007

Overview

- Background
 - Issue
 - International and Canadian Context
- Health Canada's Initiative:
 - Consultations
 - External Working Group
 - Internal Analysis
- Next Steps

Background

Issue: Need for greater transparency in clinical trials

Registration of clinical trial information in a publicly accessible registry would:

- Mitigate selective reporting of trials
- Allow patients and health providers to make informed decisions
- Facilitate enrolment of prospective research participants
- Encourage good clinical practices
- Facilitate systematic reviews and meta-analysis
- Respond to ethical obligations to participants

Background (cont'd)

- **International Context:**
 - International Committee of Journal Editors (ICMJE)
 - Effective July 2005, registration is a requirement for publication
 - World Health Organization (WHO)
 - Leading a global project to facilitate access to CT info – International Clinical Trial Registry Platform (ICTRP)
 - Worldwide proliferation of registries
 - Industry, disease/patient groups, *ClinicalTrials.gov*, etc.

Background (cont'd)

- **Canadian Context:**

- Standing Committee on Health Report (April 2004)
- National Placebo Working Committee Report (July 2004)
- CIHR policy decision: registration as a funding requirement (July 2004)
- Leader's Forum for Health Research in Canada (Sept. 2004)

Health Canada's Initiative

- Issue Identification: Spring 2005
 - Online questionnaire (sent to over 800 stakeholders)
 - 3 workshops (Ottawa, Halifax, Vancouver)

Key Messages from 2005 Consultations:

- Need a central Canadian approach
- Government should play a central role
- Need to be consistent with international standards

Health Canada's Initiative (cont'd)

- Options Development: Spring – Fall 2006
 - External Working Group (EWG):
 - 1st meeting - April 2006
 - Mandate to develop and advise on options
 - 13 members, representing a range of stakeholders

Health Canada's Initiative (cont'd)

- Options Development: Spring – Fall 2006 (cont'd)
 - Public Consultation on EWG's preliminary options (June 2006)
 - Online workbook format
 - Findings: generally high level of support for the group's early options, with a few exceptions
 - EWG: Final teleconferences (October 2006)
 - Considered results of public consultation
 - Final Report with recommendations submitted Jan/07 (available on HC website)

External Working Group's Report: Key Messages

Generally consistent with WHO standards, with a few exceptions...

- **Use WHO data set items for registration, in addition to:**
 - *Informed consent form*
 - *Info about REB decisions*
 - *Adverse event info*
 - *Context/educational info*
- **Register all product types and all phases of trials**
 - *But allow for delayed disclosure of competitively sensitive info if “demonstrably justified” by sponsor*
- **HC should have a central role in registration**
- **Recommendations re: reporting on outcomes**
- **Link with www.ClinicalTrials.gov in U.S. with a Canadian “front-end”**

Health Canada's Analysis

- Winter – Spring 2007
 - Considers:
 - Results of Health Canada's public consultations
 - External Working Group's Recommendations
 - Ongoing international and domestic initiatives
 - Ongoing Health Canada initiatives

Current environment

- **Other Health Canada initiatives**
 - Progressive Licensing Framework
 - Part of HPFB's Blueprint for Renewal initiative
 - Review of Clinical Trial Regulations (Division 5)
 - Purpose: to determine whether 2001 regulatory framework met its objectives
 - Results of consultations with stakeholders will help inform short, medium and long term initiatives to strengthen and improve the current regulatory framework
 - Research Ethics Boards initiatives:
 - Sponsors' Table for Human Research Participant Protection in Canada
 - Development of Voluntary Standard for REBs

Current environment (cont'd)

- **International Federation of Pharmaceutical Manufacturers and Associations (IFMPA)**
 - Launched Int'l clinical trials search portal: September 2005
- **WHO's Initiative**
 - Developed Registration Data Set
 - Issued Voluntary Policy: May 2006
 - Launched Clinical Trial Search Portal: May 2007
- **Int'l Committee of Medical Journal Editors (ICMJE)**
 - Issued Policy update: June 2007
- **Recent U.S. Legislation**
 - Individual states (Maine, California, Hawaii, Michigan, etc.)
 - FDA Amendments Act of 2007

Health Canada's Approach

- Notice to Stakeholders – Fall 2007
 - HC is exploring development of regulatory requirement for registration and disclosure of results
 - Also examining creation of a bilingual Canadian search portal for clinical trials
 - HC encourages sponsors to register trials of therapeutic products while this work progresses
 - Trials should be registered within 21 days of a trial's onset on either:
 - www.ClinicalTrials.gov
 - www.controlled-trials.com/isrctn

Next Steps

- Continue monitoring/analysis of international and domestic initiatives:
 - WHO, ICMJE, industry, other regulators, etc.
- Continue to examine development of regulatory requirement for clinical trial registration and disclosure of results
- Development of options for Canadian search portal for clinical trials
 - Consider including additional criteria?