CTCG updates

Clinical Trials Coordination Group

CTIS Info Day

22 May 2025

CTCG updates

- Best Practice on Seasonal Vaccines Clinical Trials for Sponsors (published on CTCG website 8 January 2025)
- Revision Recommendation paper on AxMPs in Clinical Trials
- CTR-Collaborate Project – Latest Activities
- Guide for Change of Trial Sponsor (06 February 2025)
- Templates (separate topic on agenda)

Best Practice on Seasonal Vaccines Clinical Trials

Problem observed for seasonal influenza vaccines

- Timeframe from strain change announcement to trial initiation is challenging.
- Based on production and testing schedules, the availability of batch analysis data for the final drug product may only be by the end of June.
- With the CTR procedure timelines (106 calendar days review timetable), the Sponsor must submit the Clinical Trial Application earlier in order to conduct the trial within the upcoming vaccination season.

CTCG	Best Practice	Version 1.0
Best Practice on Seasonal Vaccines Clinical Trials for Sponsors		
	Adopted by CTCG	8 January 2025

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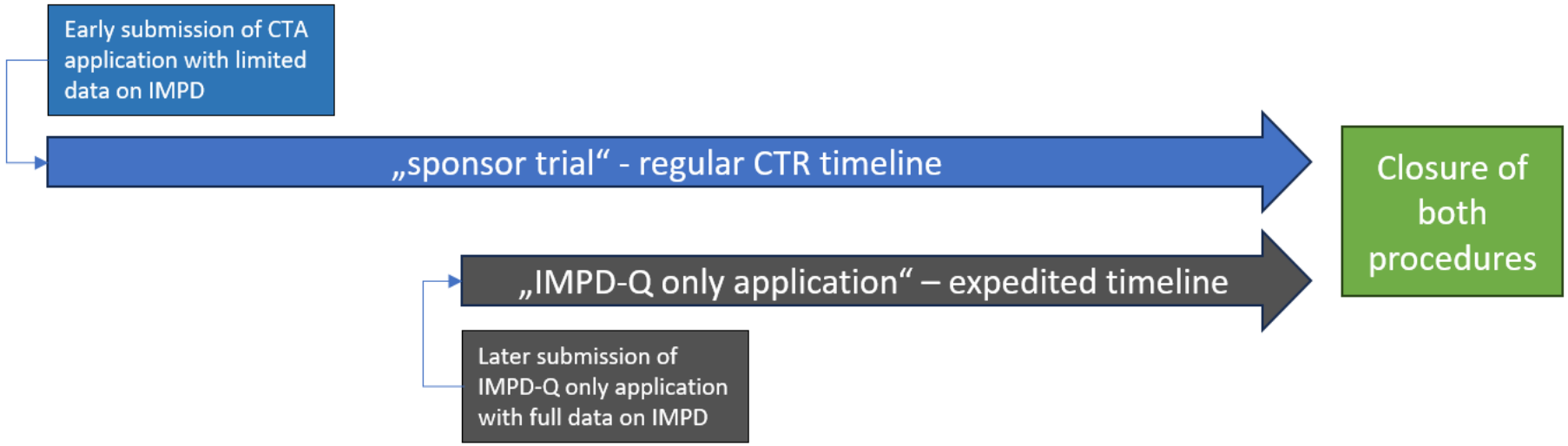
Scope

- Applies to **seasonal vaccines** where the relevant strains for the next season are only communicated in Q1 of the respective year
- Sponsors have only very limited timeframes available to manufacture and fully characterize the IMP after the strains have been communicated
- Procedure which allows submission of an **early CTA without the full IMPD data** and **later submission of an IMPD-Q only** application with an expedited timeline that contains the full IMPD data set

Schematic for the procedure

Figure 1: Schematic overview on the submission strategy for seasonal vaccines



To allow for a full assessment of the CTA while also considering limited time available for the provision of the full IMPD data, the submission of respective CTAs **is split in two parts**

1. an early initial submission that contains all information with the only exception concerning the full set of IMPD data and that is processed according to the regular timeframes (“sponsor trial”).

2. a later *IMPD-Q only* submission that contains the full IMPD that is processed according to expedited timeframes before the part I conclusion of the “sponsor trial” application.

Procedural steps

1. Sponsors informs RMS on intended procedure and proposes timetable according to BP
2. Agreement sponsor and RMS
3. Submission of early CTA according to agreed timetable
   - Full IMPD not yet available
   - Regular timelines
4. Submission of IMPD-Q only according to agreed timetable
   - Expedited timeline
5. Conclusion of IMPD-Q only followed by conclusion of early CTA

Expedited IMPD-Q-Timeline

Validation
(days after start of the procedure)
Day 3 - Document considerations and Submit RFI
Day 7 – Respond to RFI
Day 8 – Assess RFI response and submit validation conclusion

Assessment IMPD-Q
(days after validation conclusion)
Day 15 – Circulate draft assessment Part I report
Day 21 – Document considerations (3 days), consolidate considerations and submit RFI (3 days)
Day 28 (or 33)[4] – Respond to RFI
Day 35 (or 40)[4] – Assess RFI response, Submit final Assessment Report and Conclusion Part I

Role of the RMS to
- conduct the validation and
- assess the response to RFI for the validation and assessment phase and
- conclude on the acceptability

Example for timeline

Table 1: Example for submission timelines for seasonal vaccines

Timeline Sponsor Trial		Timeline IMPD-Q only	
Date	**Phase**	**Date**	**Phase**
05.06.2025	Start of the procedure		
18.06.2025	Validation conclusion		
	Assessment Part I and II	21.07.2025	Start of the procedure
		24.07.2025	Document validation considerations and submit RFI
		28.07.2025	Respond to RFI validation considerations
		29.07.2025	Assess RFI response and submit validation conclusion
		13.08.2025	Circulate draft assessment Part I report
		19.08.2025	Document considerations, consolidate considerations and submit RFI
		26.08.2025	Respond to RFI Part I[§]
		02.09.2025	Assess RFI response, submit final Assessment Report Part I
02.09.2025	Conclusion Part I		
04.09.2025 (latest)	Decision*	*Submit Decision task should preferably be completed earlier, where possible.	

[§] In this example, sponsor chose a timeframe of 7 days for response to RFI Part I in *IMPD-Q only* submission.

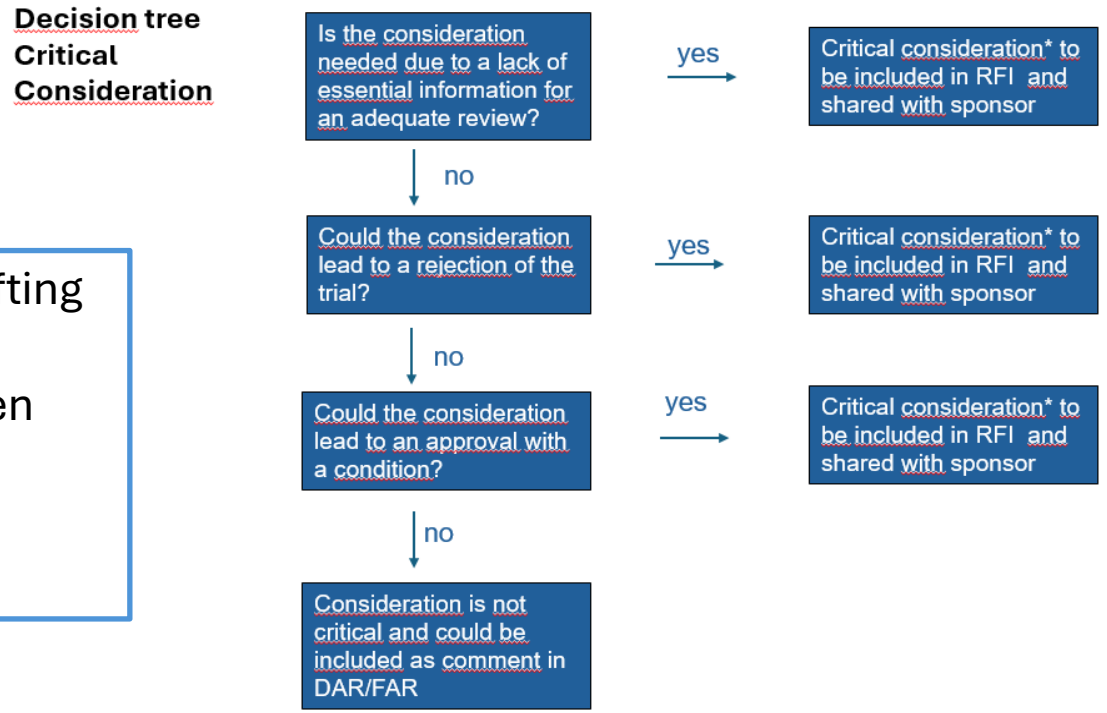
Revision AxMP recommendation paper

- Clarifications needed based on slido questions from sponsors in different meetings (bitesize talk, CTIS walk-in clinic, CTIS info day, helpdesk (EMA, national helpdesks), et cetera
- Feedback from EFPIA and non-commercial sponsors via Multistakeholder Advisory Group
- Including risk appropriate approaches
- Consistency in lay-out: authorised unmodified AxMPs, authorised modified AxMPs, unauthorized AxMP: definitions and requirements
- Other topics: source country of IMP/AxMP, structured data in CTIS and documentation, safety reporting, standard of care as background treatment, labeling
- Revision foreseen Mid 2025

ACT EU - CTCG „CTR collaborate project“

- Workshops with MSs (NCA and Ethics) to discuss and progress on the following topics:
  - Strengthen the role of the RMS
  - Analyses of annex I requirements
  - Critical considerations:

Update best practice on drafting considerations for NCA and Ethics (collaboration between CTCG and MedEthicsEU)



*..... Key steps preparing the consideration text: describe issue, explain rational for issue, describe clearly what the applicant is expected to do .....

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Guide for Change of Trial Sponsor

Pre-Requisites and Activities before Submission

- Pre-Requisite for sponsor change application:
  Authorisation of the trial by all MSs
- Legacy trials (trials submitted before 18 June 2024):
  Check for redacted versions of documents in scope of new transparency rules (if needed: CCI/personal data SM to upload redacted version, indicate limited scope in cover letter; absence of CCI/PD shall be indicated in the cover letter otherwise)
- OMS registration and user administration
- Finalisation of all pending applications before creating the (draft) SM for sponsor change (special case ASR procedure)
- Transition trials (to be considered for the hand over agreements):
  First SM after Sponsor change SM is first SM post transition (documentation to be completed in line with CTCG guidance)

Guide for Change of Trial Sponsor

Validation and Assessment Activities (Timelines)

- Validation:
  Considerations on proof of payment or structured data possible, in the absence of considerations completed in 6 calendar days
- MSs´fee requirements published in annex to Sponsor guide
- After completing validation RMS uploads standard template AR to both FAR sections and finalises conclusion and ideally also decision the same day
- The MSC(s) complete(s) the decision task within a maximum of 5 calendar days.
- There is no expectation that doubts in relation to a sponsor are dealt with during the change of sponsor SM. Instead, these will be addressed after the end of the procedure.

Guide for Change of Trial Sponsor

After SM Authorisation (Timelines)

- Sponsor performs impact assessment:
  Change of sponsor legal entity requires other SMs (affect patients‘ willingness to continue with trial)?
- Sponsor submits an SM Part I and/or SM Part II without undue delay when needed according to impact assessment
- Within this subsequent SM application, the sponsor also submits all other documents reflecting only the administrative change of sponsor
- This SM Part I and/or Part II will be handled in a standard SM application procedure as it can also include other scientific changes
- If no SM needed reflection of non-substantial changes in the TMF
- Re-labelling can take place with the next batch release
- A valid contact point should be ensured at all times

Thank you for your attention!