出國報告(出國類別:開會)

第 59 屆藥物資訊年會(DIA)及 TFDA 藥政專題論壇

服務機關:衛生福利部食品藥物管理署

姓名職稱:吳秀梅署長、張婷雅科長、莊昕容副審查員

派赴國家/地區:美國/波士頓

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摘要

藥物資訊協會(Drug Information Association,簡稱 DIA)是一個國際性組織,其會員包含來自各國藥政主管機關、學術研究機構、生物科技和醫藥研發公司、製藥公司,及受託研究機構等人員組成。該協會每年舉辦全球及於各區域之年,分享全球醫藥新知、藥物研發近況和法規分享之會議,提供專業的藥物研發知識,並促進會員間經驗交流,並促進藥政管理政策研擬之討論。

第 59 屆藥物資訊協會年會(DIA 2023 Annual Meeting)於 2023年 6 月 25 日至 6 月 29 日在美國波士頓舉行。臺灣由衛生福利部食品藥物管理署(TFDA)的吳秀梅署長率領 TFDA 和財團法人醫藥品查驗中心(CDE)代表參加本次會議,並受邀主持藥政專題論壇,其主題為「法規機構對分散式臨床試驗的看法 (Regulatory Insights into Decentralized Clinical Trials)」,該論壇匯聚來自美國 FDA、歐盟 EMA、瑞士 Swissmedic、TransCelerate等國家的法規單位及業界專家,共同探討分散式臨床試驗的經驗和國際發展趨勢,同時也向國際界宣傳臺灣已經準備好參與新型態臨床試驗,並與國際臨床試驗領域攜手前進。

本次 TFDA 除分享我國在分散式臨床試驗的經驗及未來展望,亦 受邀發表 Poster,分享我國在 COVID-19 疫苗審查研發及罕見疾病藥 物(孤兒藥)法規判定之相關經驗,與各國交流藥品審查經驗,促進未 來合作機會。同時,也透過與各國藥政主管機關的雙邊會談,促進在 疫情後新興議題上的合作機會,並為未來的持續交流奠定基礎。

TFDA 多次受邀在藥物資訊協會年會上分享藥政管理的經驗,並 在會議期間與多國藥政主管機關進行雙邊會談。這反映世界各國對臺 灣藥政管理實力的高度評價,同時也向全球展示臺灣在醫藥研發及政策管理領域的實力和國際競爭力。

關鍵字:「藥物資訊協會」(Drug Information Association, DIA)、 衛生福利部食品藥物管理署(Taiwan Food and Drug Administration, TFDA)

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壹、 目的

藥物資訊協會(Drug Information Association,簡稱 DIA)是一個國際性組織,匯聚了政府藥物法規機關、學術界、生物技術醫藥研發公司、製藥公司以及委託研究機構(CRO)等成員。該組織致力於推動全球健康,促進藥物研發和生物醫學技術創新,並藉此實現跨領域的產業交流和經驗分享。DIA的年度全球大會(DIA 2023)被譽為全球藥物研發和法規執行的最大盛會,提供了專業的藥物研發知識,並讓會員間得以交流藥物研發經驗和藥政管理趨勢。

DIA 的全球年會匯集了來自世界各地的醫藥研發人員,共同分享知識,拓展洞察力,推動全球醫療產品的創新和生命管理。今年是第59屆 DIA 年會,活動於6月25日至6月29日在美國波士頓舉行,吸引了來自全球多個國家和400多家參展公司的數千名製藥行業精英,以及生物技術、醫療設備和社區醫療專業人士,參與者人數超過5000人。會場內設有339個展覽攤位,並提供13個主題軌道下的超過170個議題。這些議題由來自各個領域的3-5名代表進行演講。醫藥先進國之藥政主管機關,如美國FDA、歐盟EMA、日本的醫藥品醫療機器總合機構(PMDA)和加拿大Health Canada等,都派遣了資深官員參加。

今年,食品藥物管理署(TFDA)的投稿在 DIA 大會上得到認可,我們受邀在大會期間舉辦名為「法規單位對分散式臨床試驗的看法」的論壇,向國際宣傳我國在分散式臨床試驗方面的經驗,以及國際上的發展趨勢。這次論壇由 TFDA 吳秀梅署長擔任主持人,並邀請了來自美國 FDA、歐盟 EMA、瑞士 Swissmedic、TransCelerate等不同國家的醫藥法規機構和產業專家擔任講者。發表我國於 2023 年公布的「藥品臨床試驗執行分散式措施指引」,並與各國分享我們在這方面的成就,同時與其他國家的法規機構交流執行經驗。在大會期間,我們也

展示兩篇 Poster 論文,其中包括我們在 COVID-19 疫苗審查研發和罕 見疾病藥物(孤兒藥)法規判定方面的經驗。

貳、 過程

ー、行程

日期	具體任務	說明
112.6.24-25	啟程往美國波士頓	桃園機場出發,於舊金山 機場轉機,抵達波士頓洛 根國際機場
112.6.26	參加 DIA 課程及研討	
112.6.27	會,舉辦 TFDA	
112.6.28	Session,參觀大會 展覽,並與6個法規	
112.6.29	單位進行雙邊會談。	
112.6.30-7.1	返程	由波士頓洛根國際機場起飛,於芝加哥機場轉機,抵達台灣

二. 會議情況

(一) TFDA's Session- Regulatory Insights into Decentralized Clinical Trials

本次的主題為「Regulatory Insights into Decentralized Clinical Trials」,由 TFDA 吳秀梅署長主持,並由 TFDA 莊昕容副審查員、美國 FDA Dr. M. Khair ElZarrad (Director, Office of Medical Policy, CDER)、歐盟 EMA Dr. Steffen Thirstrup (Chief Medical Officer, EMA),及瑞士 Swissmedic Dr. Simone Ferbitz-Scheurer (Head of Division Clinical Trials)、TransCelerate Janice Chang (CEO)進行分享。

吳秀梅署長首先簡介分散式臨床試驗是「以受試者為中心」,利 用數位化工具,進行遠端醫療、居家照護、藥物遞送到府、數位化知 情同意、蒐集數據等臨床試驗工作,並說明 COVID-19 疫情及數位化 工具的發展促進分散式臨床試驗之演進,同時介紹現行各國分散式臨床試驗法規政策執行概況,現行有些國家已經釋出分散式臨床試驗相關指引,如瑞典、歐盟、美國、丹麥、瑞士、中國及台灣,並引介各位講者上台進行演講。

接下來,由莊昕容副審查員介紹台灣藥品臨床試驗及分散式措施指引執行現況,包含簡介指引針對執行分散式措施一般考量事項、招募受試者及數位化告知同意、交付及提供試驗藥品遠距醫療、提供及交付藥品、遠端監測受試者的安全,及受試者不良事件之建議,及對臨床試驗之未來展望。

再來,由 Dr. M. Khair ElZarrad 分享美國 FDA 對分散式臨床試驗之觀點,主要探討了分散式臨床試驗的好處和挑戰,並分享美國 FDA 近期推出提供了相關的規範和指引,包含 <Decentralized Clinical Trials for Drugs, Biological Products, and Device> 及 <Digital Health Technologies for Remote Data Acquisition in Clinical Investigations>指引,說明分散式臨床試驗是指利用數位健康技術、遠距訪視和其他技術,將試驗帶到患者身邊的一種試驗方式。FDA 認為這種方式可以提高試驗的效率和可行性,減少受試者的負擔和風險,同時也可以提高數據的質量和可靠性。然而,分散式臨床試驗也面臨著一些挑戰,例如如何確保數據的安全性和隱私性,如何進行遠程評估和監測,以及如何處理試驗中的不確定性和變異性等。因此,未來希望能在汲取更多經驗,以幫助試驗人員和相關機構進行分散式臨床試驗。

接著,由 EMA Dr. Steffen Thirstrup 分享 EMA 對分散式臨床試驗之見解,包括 EMA 於 2022 年發布< Recommendation Paper on Decentralised Elements in Clinical Trials> ,分散式臨床試驗的優點、挑戰,及概述各國規定,並說明 EMA 迄今尚未有透過的完整

分散式臨床試驗核准上市的經驗,並對於如何使用技術支持分散式臨床試驗非常有興趣,鼓勵廠商及相關單位提供科學性建議。

Swissmedic Dr. Simone Ferbitz-Scheurer 分享關於瑞士執行分散式臨床試驗之相關經驗,包含瑞士分別於 2019 及 2021 提出 Guidance COVID-19 pandemic 及 Position Paper DCT、分散式臨床試驗的定義、優點、挑戰、Swissmedic 的角色和責任、以及分散式臨床試驗的實施和管理等方面的資訊。在角色與責任上,Swissmedic 主要負責安全性、風險管理及執行品質之管理,倫理委員會則負責受試者招募、基礎設施的適宜性,及個人數據保護。另外,在挑戰方面,Swissmedic 認為分散式臨床試驗需要更多的協調和溝通,包括與參與者、調查員、法規單位和其他相關方面的溝通,這可能會增加試驗的時間和成本,以確保數據的準確性和可靠性。Swissmedic 會執行pilot DCTs,並鼓勵廠商可以及早諮詢。

TransCelerate Ms. Janice Chang 分享以病患為中心的醫療健康照護之重要性,以及分散式臨床試驗如何促進臨床試驗的可近性,並促進受試者召募、保留及多元性,且更能提供受試者適時之照護,也提及執行分散式臨床試驗措施應考量因素,包括適合目的的工具和技術、成本與效益的平衡、數據品質和可信度等。另外,Ms. Janice Chang 亦強調各利益相關者 (Stakeholders) 間合作的重要性,包含衛生主管機關、試驗委託者、試驗主持人、各公協會組織或聯盟及學術界等,對臨床試驗之轉型至關重要。

在 Panel Discussion 期間,來自各國醫療機構、業界及公協會組織皆提出針對演講內容相關提問,討論議題包含 DCT 適用範圍(治療領域、族群、人數及 endpoint 等)、實地訪查之必要性、Direct-To-Patient (DTP)之執行情形,及數位工具如何進行驗證及認證等。於此方面,講者認為如需醫院密集觀察之疾病標的或部分 oncology

臨床試驗,相對而言較不適合使用DCT相關設計,建議廠商及試驗主持人應評估疾病特性判定,或應儘早與法規單位進行資訊、討論及溝通。有關實地訪查及數位工具確效及認證的的部分,講者認為為新興試驗措施及數位工具之持續發展,讓實地訪查更具有必要性,以針對試驗步驟實際進行相關訪談及評估,而數位工具之使用建議可以參考各法規單位所通告之指引進行確效驗證。

(二) 專題演講

1. Opening Plenary: Revolutionizing Life Sciences - How Diversity, Innovation, and Artificial Intelligence are Accelerating the Future of Health

本次會議的開幕主題由 Dr. Junaid Bajwa (Chief Medical Scientist, Microsoft) 主持,探討醫藥產業近期變革及對臨床發展之影響,並邀請各領域專家分享多元觀點和見解,包含 Dr. June Raine (CEO, MHRA)、Dr. David Mukanga (Deputy Director, Bill and Melinda Gates Foundation)、Dr. Amir Kalali (Co-Chair, Decentralized Trials and Research Alliance)、Mr. Armen Mkrtchyan (Senior Principal, Flagship Pioneering)、Najat Khan (Chief Data Science Officer and Global Head, Janssen)、Isaac Kohane (Chair, Department of Biomedical Informatics, Harvard Medical School)等。

本次開幕主題名為「改變生命科學:多元性、創新和 AI 如何加速未來健康」的討論,引領參與者探索多元性、創新和人工智能如何正在改變生命科學行業,並加速未來健康的發展。深入探討生命科學行業多元性的現狀,及少數群體所面臨的障礙和機會,以及這些群體在該領域的影響,並說明 AI 佔據重要地位,與探討 Machine learning和其他形式的 AI 如何被應用於改善臨床結果,同時強調信任 AI 模型

之重要性,最後說明 2023 DIA Annual Meeting 三個重要主題包含: 臨床試驗和研究中的多元性、平等和包容性、AI 基礎模型:如何可能 改變我們的行業,以及我們如何利用它們的力量為患者帶來平等、效 率和利益,及創新療法:個別化和精準健康的未來。

2. WHO Town Hall: The New Era of WHO Listed Authorities (WLAs), Reliance in Action, and Country and Regional Focus for Regulatory Systems Strengthening

新的 WHO Listed Authorities(WLAs)框架提供了一個透明的認證系統,提供各國藥政主關機關(NRA)決定是否採認其他 NRA 決定之參考。WHO 本次提供相關規定介紹,並藉由新認定之 WLAs 的案例,來說明該計畫審查主要原則和預期的全球益處。本場由 Dr. Samvel Azatyan (Team Lead, WHO)主持,邀請 Dr. Chan Cheng Leng (Group Director, HSA)、Rogerio Gaspar (Director, WHO)、Hiiti Sillo (Unit Head, WHO),及 Janis Bernat (Director, IFPMA)進行分享

近年來,尤其是在應對 COVID-19 大流行方面,各國藥政主管機關的合作變得至關重要,相互採認機制(Reliance)及法規要求的協調和一致性,是全球醫藥法規管理之高效關鍵。因此 WHO 提出全球工作計劃(GPW 2019-2025),預計五年內建立具效率及效能之法規系統,加強各國和區域的法規管理能力,並促進優質、經過驗證和安全的醫藥產品之發展,計畫內容包括支持建設,促進良好的法規管理和相互採認機制實踐,及加強國家控制實驗室等。

在此計畫中,WHO 建立 Maturity Level (ML) 認證制度,用於判定各國藥品和疫苗法規管理的成熟度,判定程序包含:

(1) 評估是否達到 Global Benchmarking Tool (GBT)自評指標:包含 ML3 等級子指標(共 211 項),及 54 項 ML4 等級子指標,作為 WHO

用於評估國家藥品和疫苗法規管理體系成熟度的框架。目前分為 ML1、ML2、ML3 和 ML4 四個級別,其中 ML4 表示法規管理穩定、 運作良好,屬最高級別之法規管理體系。

(2) 進行 Performance Evaluation Framework (PEF)評估程序:是WHO 用於評估國家藥品和疫苗監管體系的績效的框架。PEP 包括五個項目: MA (expert review of MAA assessment)、VL (vigilance field visit)、RI (GxP Observed Audi)、LT (expert review of lab activities)和CT (expert review of CTA assessments)。如果這些中的任何一個失敗,WHO 將不會列入該國家的藥品和疫苗 WLA 清單。

截至 2023 年 3 月,全球 ML1 及 ML 2 佔所有國家的比例為 70%,其中有 39 個國家的法規單位被評為 ML2 級別,另有 57 個國家的藥品和疫苗監管體系被評為 ML3 或 ML4 級別,佔比為 30%。其中亦提到在 2022 年間,有 6 個國家的法規單位達到了 ML3 或 ML4 級別,包含新加坡(藥品 ML4 級別)、韓國(藥品和疫苗 ML4 級別)、埃及、中國和南非(疫苗 ML3 級別)以及奈及利亞(藥品 ML3 級別)。另提及若疫苗為於ML1 及 ML 2 國家開發,無法適用 WHO EUL 及 Prequalification 之機制。

再來,由 HSA Dr. Chan Cheng Leng 介紹新加坡衛生科學局 (Health Sciences Authority)向 WHO 提出 WLA 申請之旅程。首先, 先介紹成為 WLA 所需條件,包含以下幾個方面:

- (1) 評估 WLA 狀態:申請機構需要獲得 WHO 諮詢小組的意見,並評估目前 WLA 狀態。
- (2) GBT 子指標:申請機構需要在 8 個功能中達到 251 個 GBT 子指標之要求,才得以達到最高的成熟度級別 4。

(3) PEF 評估:申請機構需要通過 5 種 PEF 工具、21 個績效評估指標,及所有 140 個 GBT ML3 子指標的要求,以及 34 個 GBT ML4 子指標的要求,這些評估將由 WLA 諮詢小組 (WLA Advisory Group,WAG) 進行,決定是否授予 WLA 狀態。

其中提到,HSA 申請過程面臨了許多挑戰,最後與 WHO 之積極合作,獲得了成功的結果,並說明執行步驟包含以下:

- (1) 設定目標、制定計劃,並與 WHO 密切合作
- (2) 準備和行動: HSA 進行了多次內部審查,並對基準工具(benchmark tools)和績效評估指標進行評估和改善。
- (3) 團隊特質: HSA 擁有一支強大團隊,具有熱情和毅力,並且對於 WHO 和國際評估員對 HSA 的風險基礎方法之理解持開放態度, HSA 不斷改進和調整。

3. Cell and Gene Therapy Pulse Check

本場演講回顧細胞和基因療法的法規環境及各國優先事項,並討論可能促進再生醫療發展和可用性的關鍵因素。會中美國 FDA 提供有關細胞和基因療法的最新資訊,包括 Office of Therapeutic Products 的功能和組織架構,及細胞治療不同途徑的介紹,例如加速核准優先審查途徑和標準審查途徑。

此外,還介紹了新的CMC Development Readiness Pilot (CDRP) 計畫,旨在幫助加速細胞和基因療法的開發和審批。該計劃於 2023 年 4 月 1 日開始接受申請。該計畫每年將選擇不超過 9 個申請案,其中約三分之二是 CBER 管理之產品,三分之一是 CDER 管理之產品。要參加該計劃,參與者必須具有進行中之 CBER IND,並且需要提交 CMC 開發計畫。該計畫的好處包括提供兩個專門的 CMC 會議及進度討論

(以解決會議中出現的問題)。此外,FDA 還打算發布一份策略文件,加速 CMC 方面的開發,並以自 CDRP 計畫中學到的經驗作為案例研究。

這些措施旨在促進創新和理解,並加速細胞和基因療法的開發和核准,及參與該計劃的要求和好處。指引還提到了新的子辦公室的創建,以增強 FDA 在細胞和基因療法方面的專業知識,並提高與藥商互動的及時性和一致性。總體而言,該演講說明有關美國 FDA 細胞和基因療法的全面簡介,提供有關這些療法的最新資訊和進展。

4. Office of Generic Drugs/Office of Pharmaceutical Quality
Town Hall

本部分為 U.S. FDA 分享 Office of Generic Drugs (OGD) 和 Office of Pharmaceutical Quality (OPQ)學名藥品審查和品質管控的最新計畫,並討論 GDUFA III 之法規實踐。本演講由 U.S. FDA Mr. Aaron Josephson 擔任主持人,OGD 及 OPQ 的 Dr. Michael Kopcha、Dr. Iilun C. Murphy、Dr. Ashley Boam、Dr. Sarah Ibrahim 及 Dr. Martha Nguyen 擔任講者進行分享。

- (1) FDA OGD 及 OPQ 介紹:OGD 負責評估和核准學名藥品,而 OPQ 則 負責監督藥品品質,包含藥品製造廠、包裝及標籤等。
- (2) GDUFA III 的實施: GDUFA 是藥品與生物藥品用戶費法案的縮寫, 它是美國 FDA 與製藥行業之間的協議,旨在資助和促進學名藥的 評估和核准。GDUFA III 是該協議的第三個版本,於 2022 年起開 始實施。它包括了一系列改革措施,旨在加速學名藥的審查過程, 提高品質標準,以及增加對藥品安全性的監督。此協議還可能包括 一些與藥品品質和審核程序相關的新計畫和更新。

OPQ 說明其利用指引說明法規及科學性考量,以促進學名藥開發 及核准,並推出 Manuals of Policies and Procedures (MAPPs)加 速核准時間及流程,亦利用 Highlighted Product-Specific Guidances (PSGs)建議如何進行學名藥療效相等性試驗。

OGD 每年也會定期更新 GDUFA III Research Priorities,將說 明近五年科學性挑戰,同時也分享近期研究,包含發現 Nitrosamine drug substance related impurities 之安全性議題,及進行 Cyclosporine ophthalmic emulsion 支持該產品之評估。另外,在 GDUFA Policy Priorities 部分,分享自去(2022)年起之相關政策,包含鼓勵廠商於早期(送審前 6 個月)申請 DMF 評估,並說明建議符合 priority ANDA submission 條件(缺藥、緊急公共衛生狀態及符合 section 505(j)(11)(A))之產品,提早提供製造藥品場所及設施之相關資訊,以加速藥品之核准

5. ANVISA Town Hall

本次演講主要是針對巴西 ANVISA 的簡介。它介紹了 ANVISA 在巴西聯合健康系統(unified health system)中的角色,協調國家健康監視系統,以及其對各種產品和服務的法規管理。此外,它還強調了 ANVISA 積極參與國際組織,包含 WHO、ICMRA、ICH、PIC/S 及 IMDRF 等組織。同時,亦分享其應對 COVID-19 疫情調整法規管理的策略調整及最新情形,包含 ANVISA 的滾動式審查和預先審查會議、增加靈活性和調整優先順序、使用 EUA 機制,並開始引入 AI 人工智慧之功能。

6. Asia Town Hall

(1) 新加坡新興藥物安全監視(Pharmacovigilance)機制

本演講主要分享新加坡對藥物安全性監視的觀點,包括利用電子病歷實施主動藥物安全性監測,以及合作網絡對藥物安全監視的重要性。新加坡過去主要仰賴各地 Adverse events (AE)回報,但為加強 COVID 疫苗安全性監測,新加坡促進監測及分析工具的開發,連結去識別化之電子病歷進行觀察及分析,並利用流行病學研究評估潛在之安全性疑慮,並藉此發現 8 種 mRNA 疫苗之Adverse events of special interest (AESIs)。同時也積極參與區域及國際間之合作,包含 ICMRA COVID-19 VPN、ASEAN PMAS、PIC/S Rapid Alert System等機制。

本演講強調為合適的目的觀察健康數據和適當的分析方法, 對於上市後安全監視和法規決策的重要性,及亞洲內外合作的必 要性及潛力。

(2) 馬來西亞 GMP 制度

馬來西亞分享其藥品 GMP 法規制度和合作機制之資訊,包括國家藥政主管機關(NPRA)的角色和對藥品產品週期之觀點。同時,亦分享衛生主管機關的組織結構圖、ASEAN common technical Dossier 結構、馬來西亞藥品註冊指引(DRGD)和 Cell and gene therapy products (CGTPs)指引等相關資訊。

7. Assessing Safety in Rare Disease and Gene Therapy

罕見疾病通常需要來自安全性監測組織提出特定解決方案,以監測和評估罕見疾病治療的安全性。主要是一位這些疾病的低盛行率、 數據有限,且經常使用新型療法。基因治療也為解決罕見疾病提供了前所未有的機會,但這些機會也帶來了新的安全挑戰。

以基因療法為例,除了器官毒性之外,還存在將病毒載體傳播給 他人的潛力,或者將負載基因整合到患者的基因組中,可能形成新生 物,但可能需要長達數十年的追蹤觀察下才得以發現,因此需要創造性的解決方案來監測和評估安全性。因此在本場會議中,三位演講者分別針對基因療法開發和安全監測進行概述,並分享罕見疾病治療安全性設計和案例。

首先, Dr. Alan Hochberg (Roche) 分享基因治療安全性特殊考量,包括但不限於測試預先存在的抗體、劑量、長期追蹤、疾病登記、批號安全信號分析(強制性)、肝毒性、不同的因果關係、對載體或基因產品的免疫反應,及可能的緩解策略。

接著由 Dr. Ami S. Patel (Alexion, AstraZeneca Rare Disease) 分享多家廠商(目前 6 家)共同經營罕見疾病註冊登記之案例。 IPIG PNH Registry 旨在收集夜間發作性血紅蛋白尿症(PNH)和相關疾病患者之數據,患者將被追蹤至少 5 年,每 6 個月收集一次數據,以幫助進一步研究新的和有效的治療方法,並改善患者獲得核准的治療和治療方法的途徑。Alexion 成功利用此機制蒐集 Soliris®及 Ultomiris®之安全性數據,進行上市後安全性追蹤。

其優點包含提供 PNH 患者的數據、幫助進一步開發新的和有效的 治療方法,然而也有因需要長期追蹤患者的情况所造成負擔,也需大 量經費維護,亦可能有廠商數據保密性的疑慮。

Dr. Issa Dahabreh (Harvard T.H. Chan School of Public Health) 分享關於罕見疾病研究常見之單臂研究中,使用外部比較組的方法和理論的介紹。它探討了使用外部比較組的原因、優點和必要條件,並提供了一些實際的例子和方法。同時亦提到選擇研究來源的重要性,需要考慮到照護環境、輔具干預、治療模式和潛在人群等因素。此外,它還提到了選擇觀察性試驗的重要性,需要高效地利用試驗外的觀察數據,例如允許重複進入和適當的統計控制錯誤率等。最後,它還提到了選擇統計方法的重要性,需要根據研究設計和研究目標來選擇適當的統計方法。

8. FDA Town Hall

本次 FDA Town Hall 由 Dr. Jacqueline Corrigan-Curay、Ms. Richardae Araojo、Ms. Andi Fristedt 及 Ms. Hilary Marston,分享 FDA 目前優先事項的討論和更新,包含促進臨床試驗實施多樣性、公平性和包容性(DEI),人工智慧(AI)對送件及審查的影響,及繼續創建新興療法的核准途徑。

(三) 與醫藥產業及各國主管機關互動

本次會議參與成員包含美國 FDA、歐洲 EMA、日本 PMDA,及許多來自各國法規單位首長及人員、學者專家、國際醫藥大廠、台灣醫藥產業、各大醫院臨床試驗中心、醫藥公協會等醫藥學研機構均派員參與,吳秀梅署長亦與 USFDA、EMA、PMDA、ANVISA、Swissmedic 及 MHRA 等各國首長及代表會談,深入討論未來如何深化醫藥法規合作,加強法規科學審查人員交流,並邀請各國代表來台參與 APEC GRM 及台日醫藥交流等活動。與會期間亦與臺灣各大醫學中心試驗中心及業界代表接觸,外交部駐波士頓代表處也積極給予協助,共同拓展台灣醫藥法規國際化、審查透明與效能之知名度。

參、 心得及建議

(一) 積極參與課程,汲取各國醫藥法規政策資訊

於 2023 DIA annual meeting中,TFDA 參與多場跨國組織及各醫藥先進國所舉辦之論壇,並自會議中學習多國法規管理相關經驗,亦觀察到歷經 COVID-19 疫情後,對於各國醫藥法規單位皆產生不小的衝擊,同時各國也陸續以去中心化、數位化為目標,推出新興法規政策,包含各國推動分散式臨床試驗相關政策、WHO 建立 WLA 認證機制、EMA 推出單一電子臨床試驗送件窗口,及 FDA 發布數位化工具指引,並持續探討及推動 AI 醫療產品等相關議題及政策

另因經歷緊急公共衛生之情事,各國更意識到跨國合作及資訊交流之重要性,藉此建立多國法規合作機制,提升醫藥法規系統的效率和促進法規協和。於本次會議中,各國皆分享於疫情後法規單位之革新成果及政策,同時亦提及因應快速科技發展、現今所關注之議題。藉由本次會議,TFDA 汲取新興政策之知識及經驗,助於檢視及推動相關政策。

(二) 積極投稿舉辦論壇、張貼 Poster,分享我國醫藥法規政策及 經驗

於本次 DIA 年會中,TFDA 以「Regulatory Insights into Decentralized Clinical Trials」為主題投稿,並獲大會邀請於會議期間主辦 Session。有別於以往,本次 TFDA 亦邀請各國法規單位(包含 FDA、EMA、Swissmedic 及 TransCelerate)與一同於論壇分享及交流。

各國不僅分享其對於分散式臨床試驗之相關政策及措施,亦說明當前所遇之困境,同時亦分享未來將推動之新興政策。由於 TFDA 係於今年「藥品臨床試驗執行分散式措施指引」,他國之經驗及分享可

作為推動政策之借鏡及參考。同時於 Panel discussion 的過程中,來自各國醫療機構及公協會之提問及法規單位之回復,亦使我們獲益良多。

另因本次論壇邀請多個單位一同共襄盛舉,於論壇會議現場亦吸 引近 300 多名專業人士一同參與交流,除了讓各國認識台灣醫藥法規 環境之發展,亦與各國及業界人士之互動獲益良多。因此後續若有相 關會議,建議可邀請各國法規單位或組織一同參與及討論,可增進能 見度,同時亦可以累積國際人脈及專家資料庫。

TFDA 本次亦分享在新興藥品臨床試驗議題的革新成果,並以「COVID-19 疫苗審查研發」及「罕見疾病藥物(孤兒藥)法規判定」為題投稿,獲大會邀請進行 Poster 分享。於大會期間,透過 Poster 張貼,分享我國於藥品研發及查驗登記之新興法規制度,並藉此汲取各國新興政策之相關經驗,增加醫藥法規管理政策之能見度,促進相關資訊交流,建立良好之互動。故建議持續投稿並積極參與相關國際會議,以促進持續之國際交流。

(三) 辦理雙邊會談,促進與各國藥品法規主管機關之互動

在會議期間,TFDA積極辦理與各國藥政主管機關進行雙邊會談, 本次互動單位包含美國FDA、歐盟EMA、日本PMDA、瑞士Swissmedic、 巴西ANVISA,及英國MHRA等,皆屬醫藥先進大國,藉由本次會議, 促進TFDA與各國於疫情後之互動。於本次雙邊會談期間,TFDA積極 洽談未來合作機會,並建立良好之互動關係,,包含邀請各國專家至 我國交流、建立醫藥資訊交流機制,及討論新興政策議題等,藉此奠 定往後持續交流之基礎。 本次出席第 59 屆藥物資訊協會年會,實質增進我國與各國互動機會,未來希望持續參與相關國際醫藥法規專題會議的,積極爭取各國認同台灣藥品管理制度,促進醫藥產業進軍國際市場。

附錄 1-會議照片

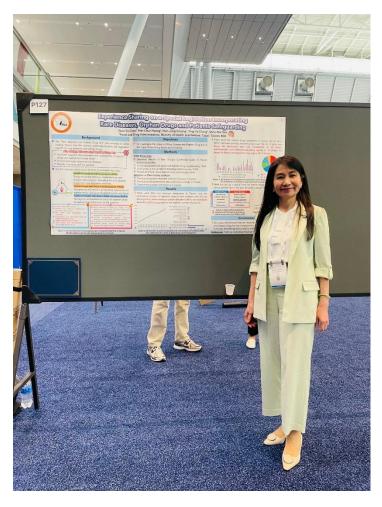
1. 台灣代表團合影

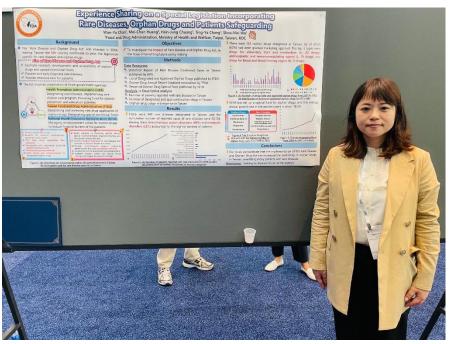


2. 吳署長與 DIA 代表及我國業界代表於 CDE 「Maximize your clinical trial success with Taiwan」展示攤位 前合影



3. 吳署長及張科長於大會專題海報前合影





4. 吳署長、張耀懋組長(衛福部)、張科長、賴怡君組長(CDE) 與 USFDA 代表進行雙邊會談之合影



5. 吳署長、張科長、莊副審查員及 CDE 代表與 EMA 代表進 行雙邊會談之合影



6. 吳署長、張科長及 CDE 代表與 Swissmedic 代表進行雙邊 會談之合影



7. 吳署長、張科長、莊副審查員及 CDE 代表與 PMDA 代表進 行雙邊會談之合影



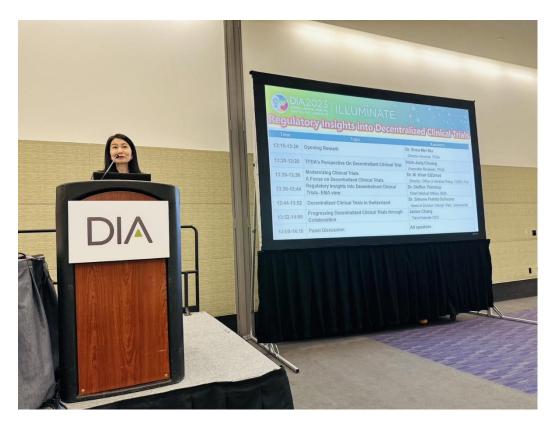
8. 吳署長、張科長及賴怡君組長(CDE)與 MHRA 代表進行雙 邊會談之合影談



9. 吳署長、張科長、莊副審查員及 CDE 代表與 MHRA 代表進 行雙邊會談之合影



10. 吳署長主持 TFDA's Session





11.TFDA's Session 合照



12. 吳署長及莊副審查員與 TFDA's Session 講者合照





Regulatory Insights into Decentralized Clinical Trials

Time	Topic	Speakers
13:15-13:20	Opening Remark	Dr. Shou-Mei Wu
13.15-13.20		Director General, TFDA
13:20-13:28	TFDA's Perspective On Decentralized Clinical Trial	Hsin-Jung Chuang
13.20-13.20		Associate Reviewer, TFDA
13:28-13:36	Modernizing Clinical Trials	Dr. M. Khair ElZarrad
13.20-13.30	A Focus on Decentralized Clinical Trials	Director, Office of Medical Policy, CDER, FDA
13:36-13:44	Regulatory Insights into Decentralised Clinical	Dr. Steffen Thirstrup
13.30-13.44	Trials- EMA view	Chief Medical Officer, EMA
13:44-13:52	Decentralized Clinical Trials in Switzerland	Dr. Simone Ferbitz-Scheurer
13.44-13.52		Head of Division Clinical Trials, Swissmedic
13:52-14:00	Progressing Decentralized Clinical Trials through	Janice Chang
13.32-14.00	Collaboration	TransCelerate CEO
14:00-14:15	Panel Discussion 29	All speakers

About Chair



Dr. Shou-Mei Wu

Director-General | TFDA | President | CDE

Past Position:

Director

School of Pharmacy Kaohsiung Medical University, Taiwan *Director*

Department of R&D Kaohsiung Medical University, Taiwan **Education/Training**:

Visiting fellow

School of Pharmacy Tokushima University, Japan

Visiting fellow

School of Chemistry University of Virginia, Virginia, US *Ph.D.*

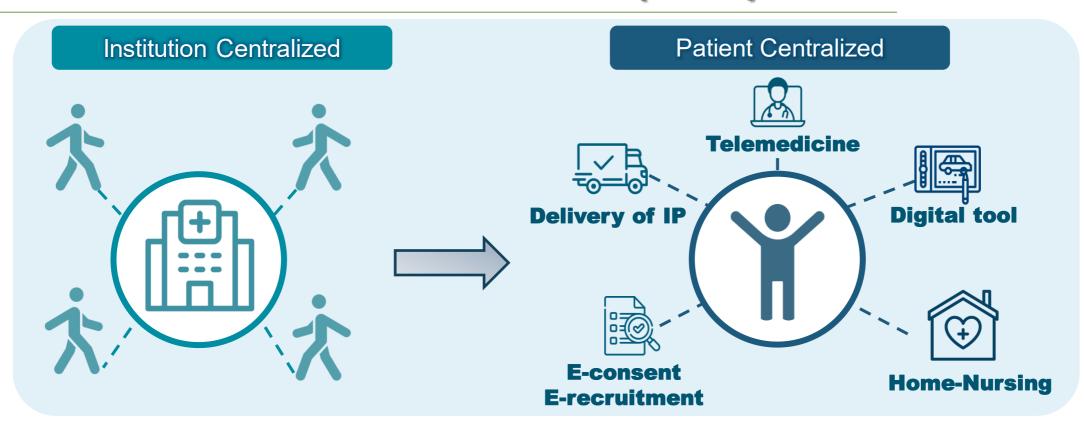
Pharmaceutical Analysis School of Pharmacy Kaohsiung Medical University, Kaohsiung, Taiwan



GLOBAL ANNUAL MEETING

BOSTON, MA JUNE 25-29

Decentralized Clinical Trials (DCT)



- Limiting the diversity of participants
- Take long time in recruiting participants
 - Difficulties in accessing information



DIA 2023

GLOBAL ANNUAL MEETING

BOSTON, MA JUNE 25-29

Guidelines for DCT

EMA

Recommendation Paper On
Decentralized Elements In Clinical Trials
2022.12

Sweden

Q&A about Decentralized clinical trials 2021.06/2022.12

US

Decentralized Clinical Trials for Drugs, Biological Products, and Devices (Draft) 2023.05

China

Technical Guideline for the Implementation of Patient-Focused Clinical Trial(Draft) 2022.08

Denmark

The Danish Medicines Agency's Guidance on the Implementation of Decentralized Elements in Clinical Trials with Medicinal 2021.05/2021.09

Switzerland

Position Paper on Decentralized Clinical Trials (DCTs) with Medicinal Products in Switzerland 2021.09/2022.12

Taiwan

Guideline on the Implementation of Decentralized Elements in Clinical Trials with Medicinal Products 2023.06



DIA 2023

GLOBAL ANNUAL MEETING

BOSTON, MA JUNE 25-29

TFDA's Perspective on Decentralized Clinical Trial



Associate Reviewer | TFDA

Current Position:

Be responsible for MRCT review
Participating in DCT guidance implementation
ICH E20 working group

Education/Training:

Master Degree of Pharmacy
China Medical University
Bachelor Degree of Pharmaceutical Science
China Medical University

Hsin-Jung Chuang



GLOBAL ANNUAL MEETING

BOSTON, MA JUNE 25-29

Modernizing Clinical Trials A Focus on Decentralized Clinical Trials



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Past Positions:

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Acting Director | Clinical and Healthcare Research Policy
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• Education/Training : Doctoral Degree

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Dr. M. Khair ElZarrad



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Regulatory Insights into Decentralised Clinical Trials - EMA view



Chief Medical Officer | EMA

MD, PhD, Adjunct Professor Specialist in Clinical Pharmacology and Therapeutics

10 years of clinical training 20 years experience in EU regulatory system Former Member of EMA's CHMP and CAT Former Head of Licensing, Danish Medicines Agency Strategic regulatory consultant

Dr. Steffen Thirstrup

CMO as of 1 June 2022



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Decentralized Clinical Trials in Switzerland



Dr. Simone Ferbitz-Scheurer

Head of Division Clinical Trials | Swissmedic

Past Position :

Head of Division Clinical Trials | Swissmedic GCP/GVP Inspector | Swissmedic Medical Manager | Pharmaceutical industry Researcher | Field of Proteomics

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Federal Institute of Technology Zürich

Master in pharmaceutical sciences

Federal Institute of Technology Zürich

Diploma of advanced studies in pharmaceutical

Diploma of advanced studies in pharmaceutical medicine

University of Basel



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About Speakers

Progressing Decentralized Clinical Trials through Collaboration



Ms. Janice Chang

Defines and guides external engagement strategy with global health authorities, R&D stakeholders, and TransCelerate's country network spanning across 30 countries
Member of Protas' Good Clinical Trials Collaborative Steering Group

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Education/Training:

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Panel Discussion

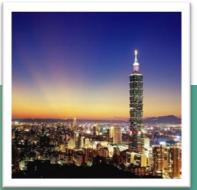


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Thank you for your attention!









~Wish You Have a Nice Day~



FDA For more information, please go to: http://www.fda.gov.tw



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Regulatory Insights into Decentralized Clinical Trials 2023.06.28



TFDA's Perspective On Decentralized Clinical Trials (DCT)

Hsin-Jung Chuang

Associate Reviewer
Taiwan Food and Drug Administration
June 28, 2023

Disclaimer

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Strengthen Clinical Trial Quality & Efficiency

International Accreditation

Credibility



24 sites (IRB) in Taiwan have received SIDCER-FERCAP Recognition certificate



12 sites in Taiwan have earned AAHRPP Accreditation

Review efficiency

- Fast track review (15 days)
- Central IRB system(30 days)

Quality

- GCP inspection
- Follow ICH guidelines

Facilitate Clinical Trials

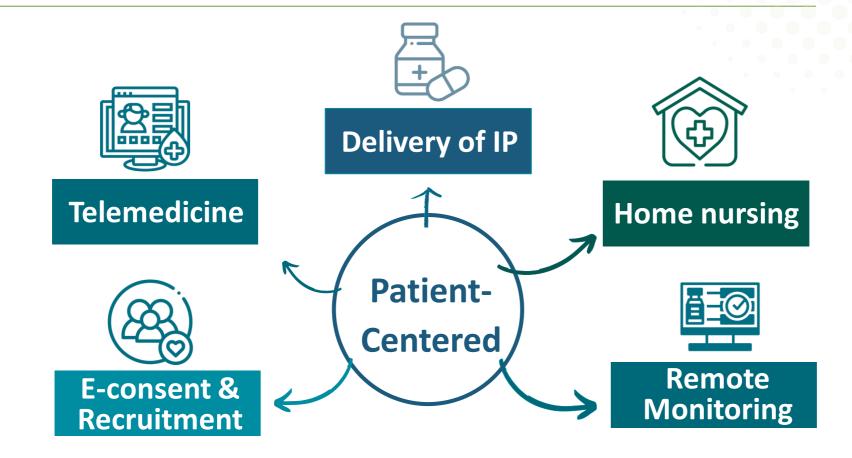
 Guidance toward decentralized elements & digital tools



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Elements of Decentralized Clinical Trials



*IP: Investigational Product

Issued "Guideline on the implementation of decentralized elements in clinical trials with medicinal products" in June 2023.



2023

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Digital Recruitment











English

- 本平台是因應新冠肺炎防疫所需,加速疫苗臨床試驗進行,以支持國內新冠肺炎(COVID-19)疫苗研發。
- 如您有意願參與COVID-19疫苗臨床試驗,請您點選「我要登記」,詳細閱讀意向書資訊並填寫相關表格。於確認資料正確無誤後,提交予本平台。平台將自動發送通知至您的電子郵件信箱,請開啟登記確認信並點選連結,以完成登記。
- 未來可能有疫苗研發廠商或試驗機構依您提供之資訊主動聯繫您。屆時您可選擇參加,亦可拒絕,將不影響您的任何權益。

我要登記

取消登記

諮詢電話 1922、1919

民眾版QA

懶人包



More than 10,000 people registered on the 1st day.

More than 30% patients in the trials were from the recruitment platform!



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Digital Informed Consent





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Telemedicine





Visit

Through video or telephone



Lab examination

- 1. At local institution/lab
- 2. At home



Adverse event reporting

- 1. Digital systems or apps
- 2. Continuous monitoring



Delivery of Investigational Products









Authorized clinical research nurses





IP chosen by

*IP: investigational product

- 1) Route of administration i
- 2) Safety profile of IMP

IP provided by

- 1) Clinical trial pharmacist
- 2) Follow Pharmaceutical Affairs Law, (GDP), GCP

Receiving drug

- 1) The trial participant or a guardian must be home.
- 2) An extra check and instruction should be made by PI after the IMP received.

*GDP: Good Dispensing practice



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Future Prospects



Follow international regulations and implement guidance on DCT/digital tools

Develop clinical trial systems (Ex. clinical trial intention registry platform)





Mock Remote GCP inspection

Government Resources Integration (e.g. Department of medical affairs)





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- National Taiwan University Hospital
- National Health Research Institutes
- National Cheng-Kung University Hospital
- Taiwan Clinical Research Association
- International Research-Based Pharmaceutical Manufacturers Association
- Taiwan Association of IRBs
- Federal of Taiwan Pharmacists Association

- Taiwan Society of Health-System Pharmacists
- Taiwan Academy Clinical Research Nurses
- MSD
- Roche
- · CHUGAI
- Lilly
- PAREXEL
- NOVARTIS
- PFIZER



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Immuno-bridging in the Evaluation of Novel COVID-19 Vaccine EUA in Taiwan: A Regulatory Perspective and Experience Sharing

Wern-Chir Liao¹, Mei-Chun Huang¹, Hsin-Jung Chuang¹, Ting-Ya Chang¹, Shou-Mei Wu¹

¹Food and Drug Administration, Ministry of Health and Welfare, Taipei, Taiwan, ROC

Objective

- Share Taiwan's experiences on novel COVID-19 vaccine emergency use authorization (EUA) review considerations.
- Describe the regulatory strategies by using Immuno-bridging studies to support the EUA of novel COVID-19 vaccine in Taiwan.

Background

- The outbreak of the new coronavirus SARS-CoV-2 (causing Coronavirus Disease of 2019, COVID-19) has, so far, resulted in more than 600 million confirmed cases and millions of deaths worldwide since the end of 2019.
- In 2020, the severe situation prompted the development of the COVID-19 vaccine, which completed the phase 3 efficacy confirmation trial in a short time and obtained EUA accordingly.

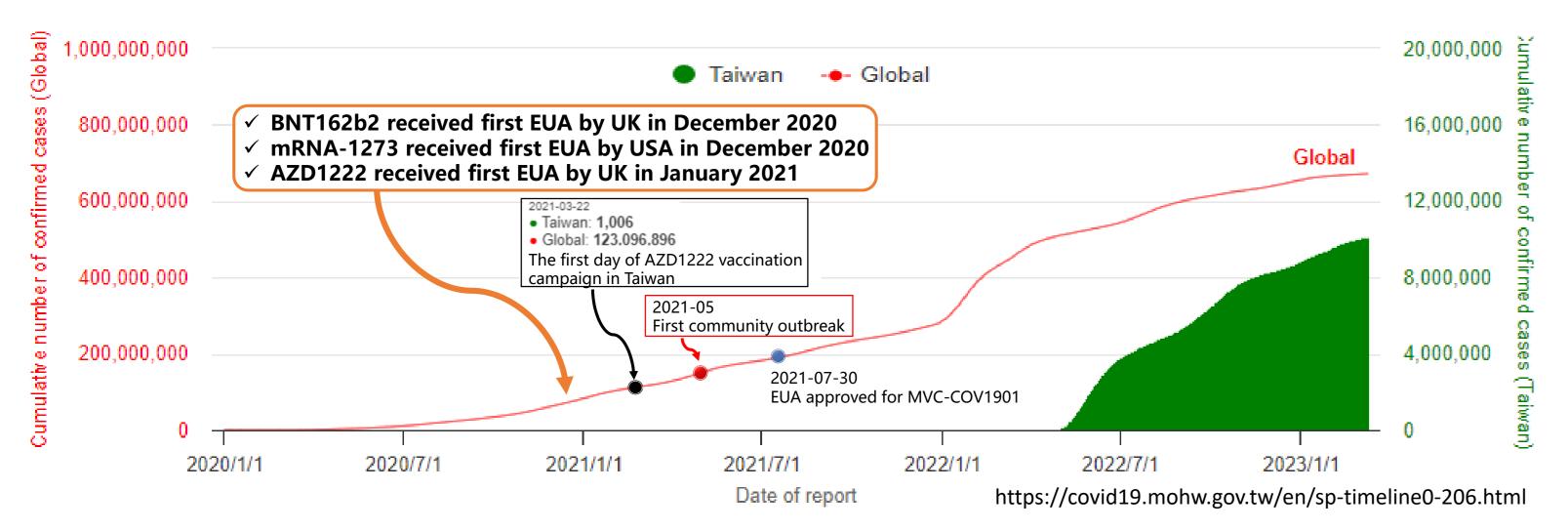


Figure 1. The trend of COVID-19 total cases showing low confirmed cases in Taiwan in 2021.

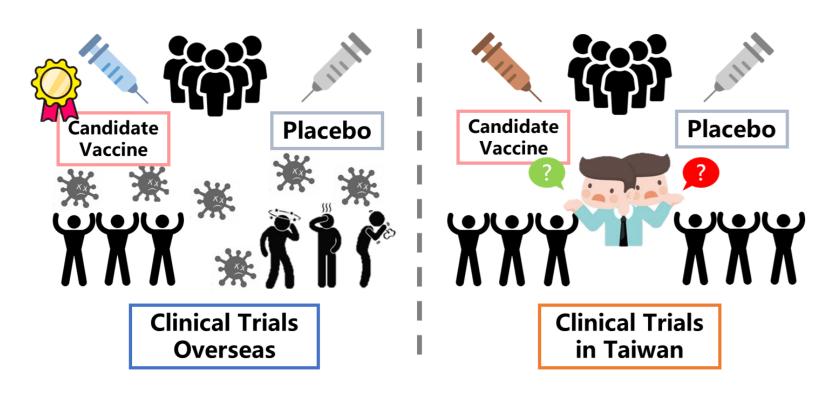


Figure 2. It's not feasible to conduct a large-scale confirmatory trial with low confirmed cases.

- The pandemic was well controlled, making it difficult to conduct a large-scale confirmatory trial in Taiwan.
- COVID-19 vaccine was still not available in Taiwan in early 2021. However, Taiwan faced its first community infection outbreak of SARS-CoV-2 in May 2021.

Acknowledgements

The TYGH-AZ study is a government-funded research, grant no. 110-TFDA-D-420. We would like to thank **Dr. Chien-Yu Cheng** for study execution at Taoyuan General Hospital, **Professor Chin-Fu Hsaio** for data clean and statistic analysis at National Health Research Institutes, **Professor Yi-Ling Lin** for Neutralization assay at Academia Sinica, and **Dr. Ming-Hsiao Chan** and **Dr. Chien-Hui Hsu** for assistance of trial design at the Center for Drug Evaluation.

Methods

- The Minister of Health and Welfare (MOHW) and the Taiwan Food and Drug Administration (TFDA) planned the TYGH-AZ study to evaluate the change in pre- and post- AZD1222 titers in an 8-week administered schedule.
- The TYGH-AZ study is designed as an external control to demonstrate non-inferiority between the domestic candidate vaccine and AZD1222.

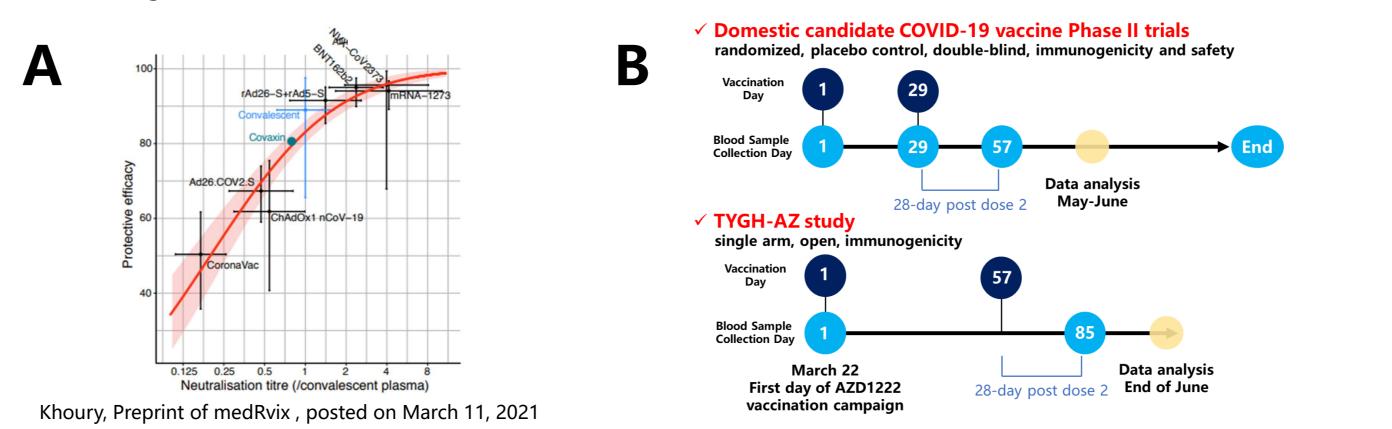


Figure 3. (A) Relationship between neutralisation level and protection from SARS-CoV-2 infection. (B) Design and enrolled criteria were harmonized in ongoing domestic phase II trials and TYGH-AZ study.

- The TYGH-AZ cohort was conducted on 22 March 2021, the first day of the AZD1222 vaccination campaign in Taiwan, and proceeded simultaneously with domestic candidate COVID-19 vaccines (MVC-COV1901 and UBI-612).
- The neutralization assay for different trials were performed in the same laboratory to avoid inter-laboratory bias.

 More conservative external controls:
 - **200** subjects with an average age of 43 years in TYGH-AZ cohort
 - Two doses of AZD1222 were administered 8 weeks apart
- The requirements for EUA review consideration are as follows:
 ☑ All technical documents are required for EUA review consideration.
 - The co-primary endpoint is set as the success criteria:
 - 1) The lower bound of the 95% confidence interval for the geometric mean titer (GMT) ratio should be above 0.67.
 - 2) The lower bound of the 95% confidence interval for the sero-response rate (SRR) should be above 50%.

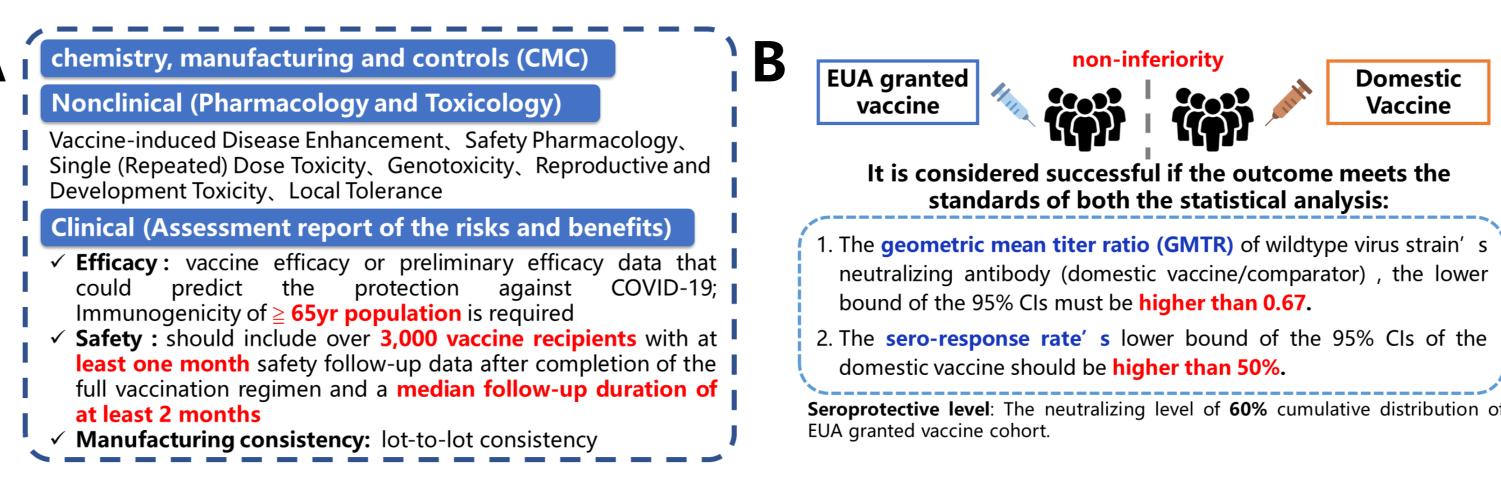


Figure 4. (A) The documents requirement for EUA review. (B) Co-primary endpoints were set for ratio of geometric mean titers and sero-response rate (SRR) at 28 days after dose two.

Results

- One of the domestic candidate COVID-19 vaccines, MVC-COV1901, meets the EUA requirements:
 - The GMT ratio against wild-type SARS-CoV-2 of MVC-COV1901 subjects is four-fold higher compared to TYGH-AZ cohort, with an SRR of over 96%.
 - **☑** Based on safety data collected from over 3,000 subjects, no serious adverse event (SAE) were observed.

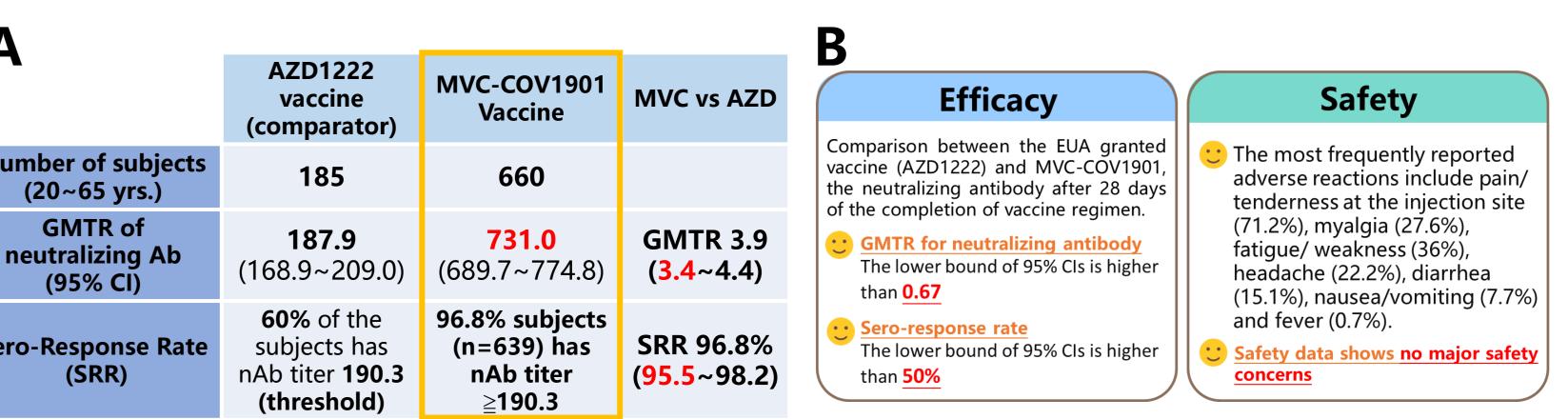
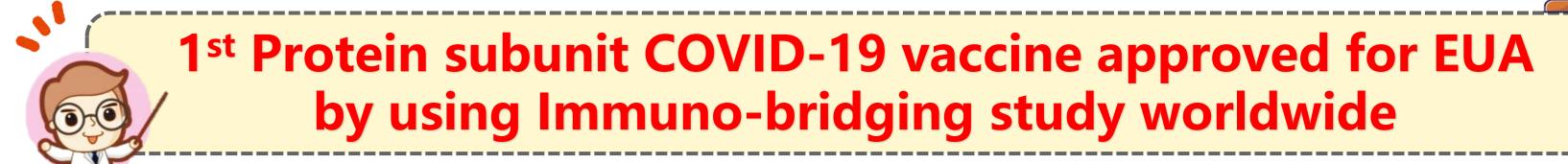


Figure 5. (A) Efficacy evaluation outcome of the MVC-COV1901 COVID-19 vaccine. (B) Efficacy and Safety Data of MVC-COV1901 COVID-19 Vaccine.

Discussion and Conclusions

- The availability of international vaccines cannot be predicted and controlled. Developing a safe and effective domestic COVID-19 vaccine is necessary to address the emergency public health status.
- Although conducting a large-scale confirmatory trial in Taiwan with low incidence and effective COVID-19 control is not feasible, the use of immuno-bridging with a non-inferior design allowed TFDA to evaluate the efficacy of the domestic COVID-19 vaccine in quick response to the outbreak in May 2021.
- Based on the non-inferiority of GMT ratio, the superiority of SRR, and no major safety concerns of MVC-COV1901, TFDA approved the EUA for MVC-COV1901 on 30 July 2021. This decision was made considering the benefit and risk assessment under high unmet medical need.
- Since uncertainties such as external control, immune-escape variants, and long-lasting effect need to be considered, a commitment made to address the remaining uncertainties, including:
 - 1) Safety report must be provided monthly
 - 2) Vaccine effectiveness report must be provided within 1 year



Disclosures

Nothing to disclose for all the authors



Experience Sharing on a Special Legislation Incorporating Rare Diseases, Orphan Drugs and Patients Safeguarding

Wan-Yu Chao¹, Mei-Chun Huang¹, Hsin-Jung Chuang¹, Ting-Ya Chang¹, Shou-Mei Wu¹ ¹Food and Drug Administration, Ministry of Health and Welfare, Taipei, Taiwan, ROC



Background

The "Rare Disease and Orphan Drug Act" was enacted in 2000, making Taiwan the 5th country worldwide to pass the legislation specific for rare diseases and orphan drugs.

- Alm of Rare Disease and Orphan Drug Act ---- (2)

- ✓ Facilitate research, development, and accessibility of orphan drugs and special nutritional foods
- Prevent and early diagnose rare diseases
- Provide intensive care for patients
- The Act involves cooperation of three government agencies.

Health Promotion Administration (HPA)

Designating rare diseases, Implementing rare disease care program, Providing fund for disease prevention and education activities

Taiwan Food and Drug Administration (TFDA)

Designating and reviewing new drug application of orphan drugs, Designating special nutritional foods National Health Insurance Administration (NHIA) Managing reimbursement prices for orphan drugs

to reduce financial burden of the patients

Figure 1. (A) Incentives for encouraging orphan drug development in Taiwan

(B) Strengthen care for rare disease patients in Taiwan

- 10-year market exclusivity
- Rewards for research, development, production and supply
- application fees reduction
- Designation and registration could be applied simultaneously
- Preferential pricing methods
- **Early access and reimbursement** for designated orphan drugs
- Assist patients in obtaining orphan drugs, special nutritional foods, diagnostic testing and household medical facilities
- Provide medical subsidies for rare diseases not covered by National Health Insurance
- Provide psychological support, attentiveness and care consultation services
- Support for school enrollment and employment
- Establish logistic center for orphan drugs storage and supply to prevent shortage

Objectives

To investigate the impact of Rare Disease and Orphan Drug Act, in the hope of benefiting future policy making

Methods

Data Resources

- Statistical Report of Rare Disease Confirmed Cases in Taiwan published by HPA
- List of Designated and Approved Orphan Drugs published by TFDA
- Orphan Drug Annual Report Database established by TFDA
- Report of Orphan Drug Special Fund published by NHIA

Analysis → **Descriptive** analysis

- Number of patients reported with rare diseases in Taiwan
- Number of designated and approved orphan drugs in Taiwan
- Orphan drug usage and expense in Taiwan

Results

There were 243 rare diseases designated in Taiwan, and the cumulative number of reported cases of rare diseases were 20,124. Among them, brain/nervous system disorders (46%) and metabolic disorders (22%) accounted for the highest number of patients.

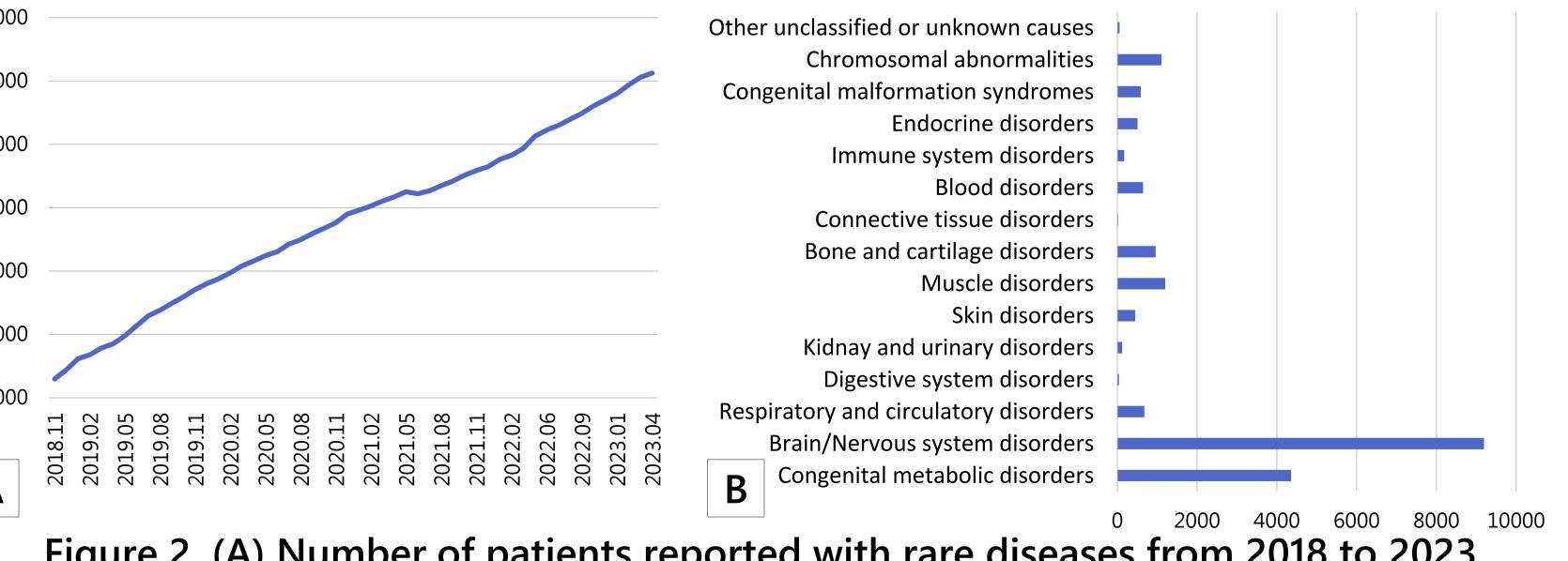


Figure 2. (A) Number of patients reported with rare diseases from 2018 to 2023 (B) Distribution of number of patients by disease categories

There were 133 orphan drugs designated in Taiwan, 82 of which (62%) had been granted marketing approval. The top 3 types were drugs for alimentary tract and metabolism (A, 23 drugs), antineoplastic and immunomodulating agents (L, 19 drugs) and drugs for blood and blood forming organs (B, 11 drugs).

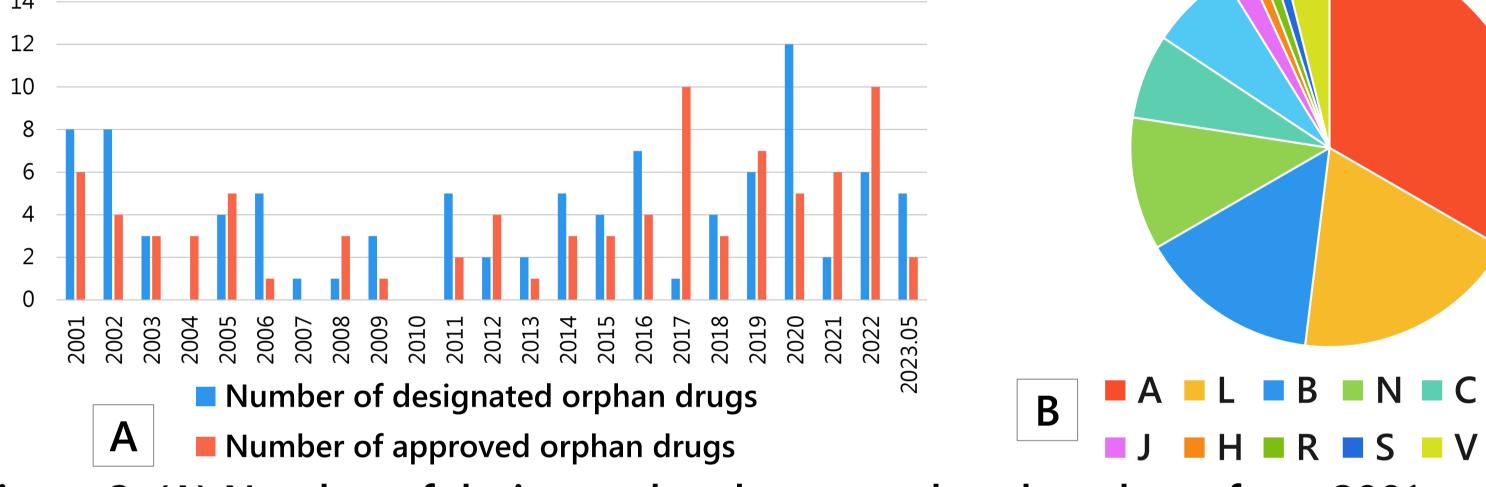


Figure 3. (A) Number of designated and approved orphan drugs from 2001 to 2023 (B) Distribution of number of approved orphan drugs by ATC code

NHIA has set up a special fund for orphan drugs, and the average annual growth rate in the past ten years is about 18.2%.

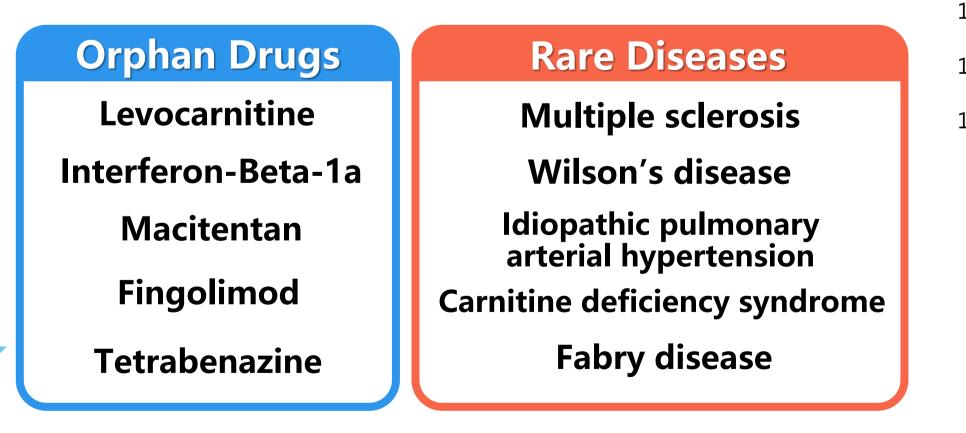


Figure 4. Top 5 orphan drugs/rare diseases with the highest number of orphan drug users from 2018 to 2022

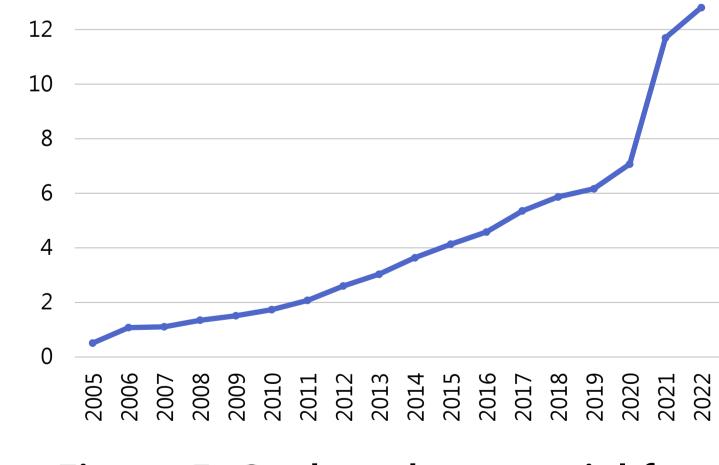


Figure 5. Orphan drug special fund from 2005 to 2022 (in billion)

Conclusions

Our study demonstrate that the implementation of the Rare Disease and Orphan Drug Act has increased the availability of orphan drugs in Taiwan, benefitting many patients with rare diseases.

Disclosures Nothing to disclose for all of the authors