WORKING INSTRUCTION

TRANSITION FROM OUTGOING DIRECTIVES TO REG 536/2014

1 PURPOSE

The purpose of this working instruction is to guide the transition from the outgoing legislation based on Directives 2001/20/EC and 2008/25/EC and implemented into "Forskrift om klinisk utprøving av legemidler til mennesker" (old legislation) to Regulation 536/2014 (new legislation) and the use of the Clinical Trial Information System (CTIS) for communication with authorities.

2 GENERAL TERMS

All trials expected to have an end of trial date after 31 January 2025 must be transitioned to CTIS and follow Regulation 536/2014 after transition. The end of trial date is usually the last patient visit, if not defined otherwise in the application/protocol.

Approval of a transitioned trial in CTIS can take up to 60 days. Prior to transition there may be a need to get acknowledgement (tatt til etterretning) upfront by authorities of documentation, including non-substantial amendments, see section 3.1. To ensure sufficient time for transition approval, the trial migration process should therefore be initiated early autumn 2024 at the latest.

See Quick guide for transitional trials and FAQs. Also Q&A, chapter 11 on Eudralex volume 10 is useful.

There should be no submitted amendments/changes pending approval from authorities according to the old legislation when transitioning to new legislation.

The application should include only the latest approved documents. No new documents should be added. When CTIS requires a form that was not required according to the old legislation, a blank form stating "Not applicable" should be uploaded.

The default for most documents is that they will be published in EU Clinical Trials as soon as the transition is approved.

3 PREPARATION FOR TRANSITION

3.1 Readiness according to old legislation

The transition is administrative and should only include documents that have been approved or acknowledged (tatt til etterretning) by authorities.according to the old legislation.

Even if an updated document has been considered as not being a substantial amendment to be evaluated by one or both kind of authorities, the newest documents should be sent in according to the old legislation (e.g. to REK Sør-øst A) with and without track changes and with a cover letter describing the changes and possibly the authority that has approved the change and when, prior to applying for transition. Once a letter of acknowledgment has been received from authorities, the submission through CTIS can take place.

3.2 CTIS

Follow the local procedure for getting the trial title entered into CTIS and appropriate roles approved by the institution.

Before uploading into CTIS:

- Ensure the IMPs are available for registration in CTIS, see SOP Investigational Medicinal Product (IMP) Management at Trial Start, section 4.1.2
- Ensure the sites are registered in the EMA SPOR portal and can be retrieved to CTIS. If sites are not registered, they should be asked to do so, see OMS03 – Working with OMS Change Requests. The registration can take up to 10 days.
- Ensure the documentation is complete before starting to upload into CTIS. This includes:
    - Documents with wet ink signatures should be specified as "not for publication", meaning that e.g. protocols with signatures should be uploaded twice, once without signatures named "for publication" and once more with signatures named "not for publication". Also ensure that other irrelevant personal information such as e.g. photos in CVs are removed from "for publication" documents.
    - The document name should include a version no and/or date that matches the version in the document.
    - It is recommended to create a PDF with study name/logo stating that the document is not required and use that document in all relevant places.
    - It is recommended to upload primarily PDFs even when other formats can be uploaded
    - Create a cover letter for transition trials including:
        - which documents have been approved by which authority(ies). For Norway, the name of the EC (e.g. REK sør-øst A) should be included.
        - A declaration that the clinical trial is in line with the requirements for transition trial as set out in the Q&A and that the clinical trial is still in line with the authorisation given under the CTD

Examples of transitioned trials that have been approved and is now on the public webside can be seen here.

If the document is too large, it should be divided in acceptable parts and named accordingly e.g. "Document name-version-part I"

4 INTERNATIONAL TRIALS

See CTFG Best Practice Guide for sponsors of multinational clinical trials with different protocol versions approved in different Member States under Directive 2001/20/EC that will transition to Regulation (EU) No. 536/2014.

Be aware that the transition will include fees in some countries, also for academic trials.

Some countries ask for some new documents such as a compliance with GDPR statement.

5 AFTER THE TRANSITION

Be aware that once in CTIS, submission of substantial modifications will follow the new legislation and its requirements for documentation.

6 CHANGES SINCE LAST VERSION

New Working Instruction.