The Japanese TMF community

Presented by Yuto Kanda* and Miyuki Taguchi**
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A member of the CJUG TMF team, TMF Operations, inSeption Group

Meet the Speakers

Yuto Kanda

Title: Lead of the CJUG TMF team

Organization:
1)Clinical Development Division, **Chugai**
2) A member of
Japan CDISC Coordinating Committee (J3C)

Miyuki Taguchi

Title: Manager, TMF Operations

Organization:
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2) A member of the CJUG TMF team

Disclaimer and Disclosures

- *The views and opinions expressed in this presentation are those of the authors and do not necessarily reflect the official policy or position of CDISC.*

- *The authors have no real or apparent conflicts of interest to report.*

Issue statement

[Background]

- In Global clinical trials many JP pharma join.
- JP pharma may need to play a part of HQ role in TMF mgt.
- This requires mutual and latest understanding about TMF-related global regulations.

The issue in Japan=

Lack of
Domestic & global communication

So, we were in silo…

Misunderstanding in Japan

JP end users' common misunderstanding	Reason/Background
I will upload my TMFs once Inspection date was fixed	
Classification doesn't matter, I remember where my TMF is!	

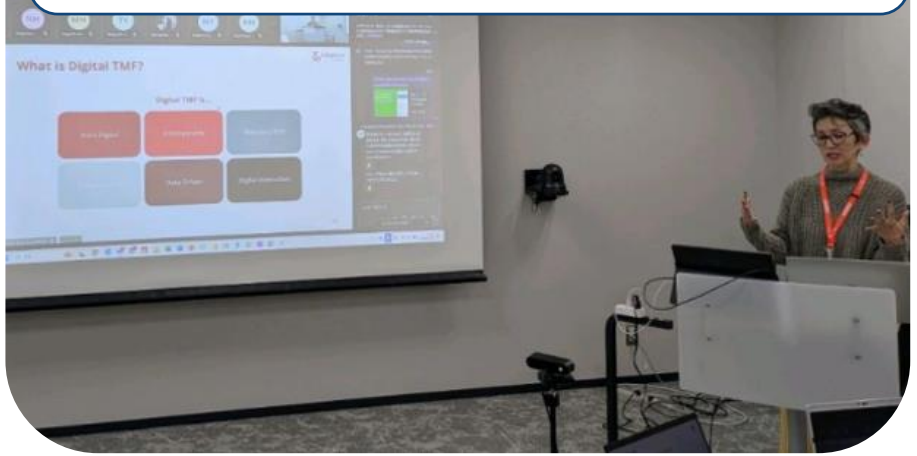
Progress in 2023-2025

- I attended EUTMF summit in 2023 & I built **small but global network** with TMF leaders
- 3 of them came to Japan and conducted **TMF related Workshop/Trainings**

ICH-E6(R3)/Inspection Readiness by Rob Jones

TMF metrics by Franciska Darmer

RM V4/People in TMF by Miyuki Taguchi



JP TMFers' voices

It is difficult to ensure consistent metadata entry

End users do not know
what the TMF reference model is ☹

I need to catch up with global progress,
but I don't know how to do it

Classification is not so consistent
across sponsors...

I don't know how to manage ISF in my site..

OK, then what do you want??

Connection with other TMFers!

Training/Learning opportunities!

TMF event!

Based on these voices, the local community was launched in Japan

CJUG : CDISC Japan User Group

Mission : CDISC standards penetration

ADaM

CDASH

SDTM

SEND

TMF

since Q1 2025

CJUG TMF team X-ray

of total members = 42

Type	Organization(A-Z)
Pharma	Asahi Kasei Pharma, **Chugai**  , Merck KGaA, KM Biologics, Novartis, SinoCellTech & Sumitomo Pharma
CRO	A2 Healthcare, CMIC, Linical & PPD-SNBL
Service Provider	Agatha, ClinCloud, CRS cube & Medidata
Academia	Juntendo University, Keio University Hospital, Kobe University Hospital & Nagoya University Hospital
Consulting	**inSeption Group** 

CJUG TMF team X-ray

ICH-E6(R3) vs TMF	Sponsor-CRO collaboration
Record management in Academia	TMF Reference Model

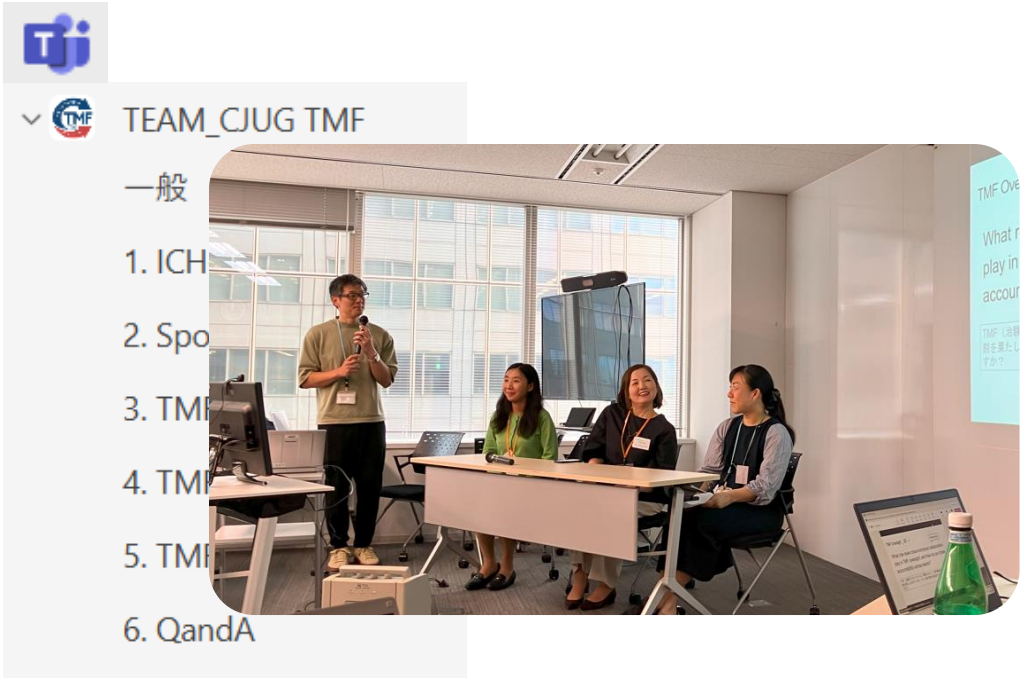
CJUG TMF team's activities

- Monthly meeting(full-remote)
  - 9:30am- : breakout for 4 sub-teams
  - 10:30-12pm all members meeting

- We've set up MS-Teams
  so that we can always be in touch virtually
  - It's quite active and useful and useful!

- Many practical questions
  have been raised & discussed

- We had the **1st F2F workshop** on 24June2025
- The **2nd F2F workshop** will be on 3Dec2025



Feedback from the members

How much
are you satisfied?

- ***I can learn a lot from other companies***
- ***I can discuss practical issues/questions***

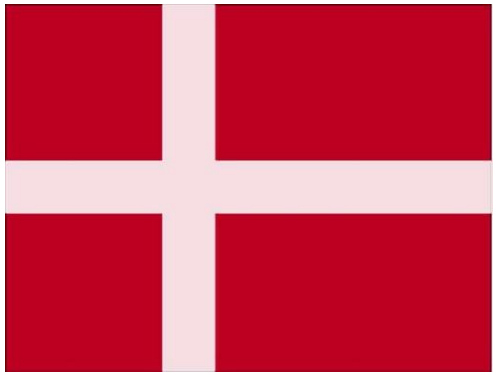
-Is it required to upload reviewed version of study protocol?
-Is feasibility questionnaire TMF or not?
-Which classification would be the best for document XYZ?

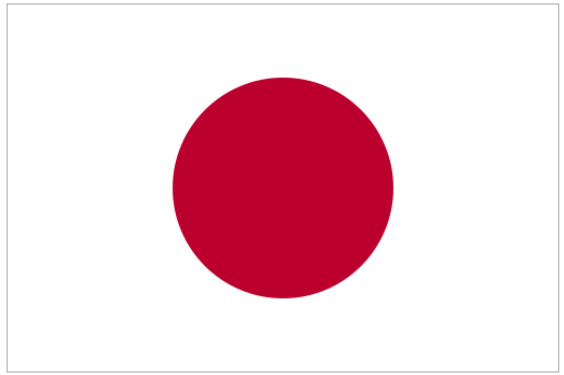
Collaboration between Denmark and Japan

- **I was very much inspired by Karla's presentation in EU interchange...**

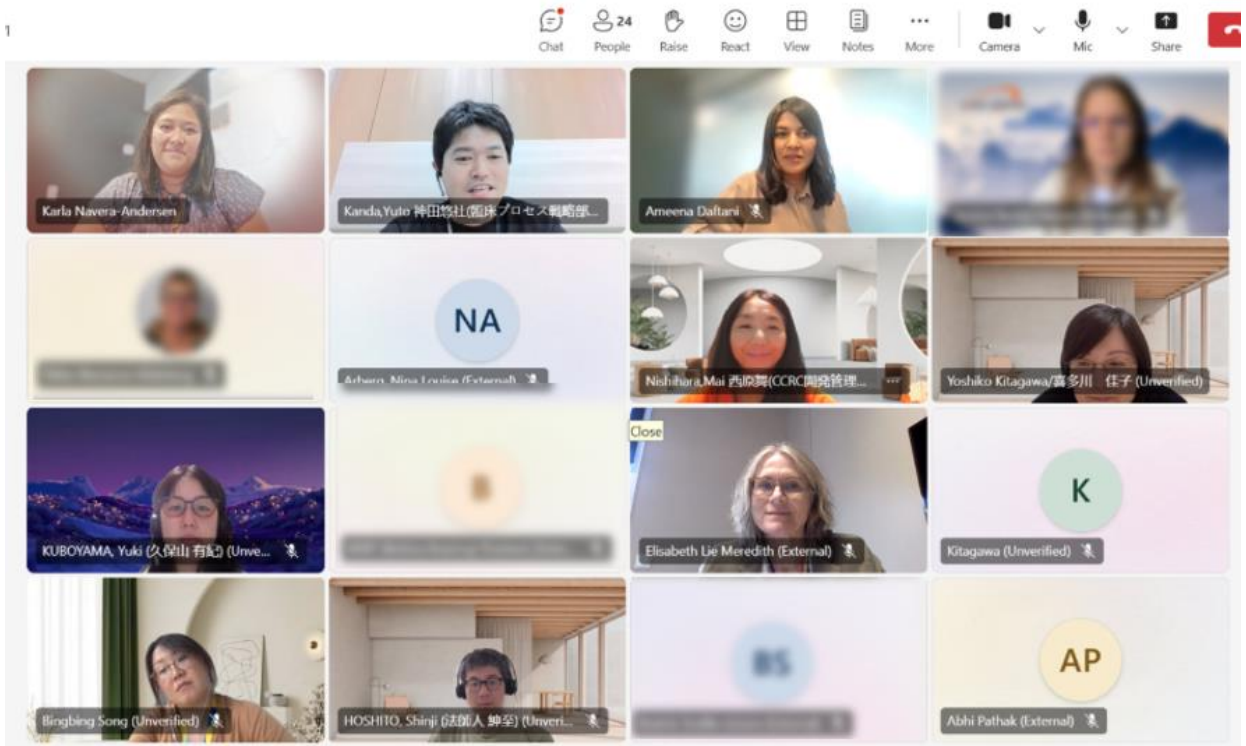
The Danish TMF Network
Karla Navera-Andersen, Ascendis Pharma A/S

- **In the end, we had a joint meeting with TMF managers in Denmark!**





Collaboration between Denmark and Japan



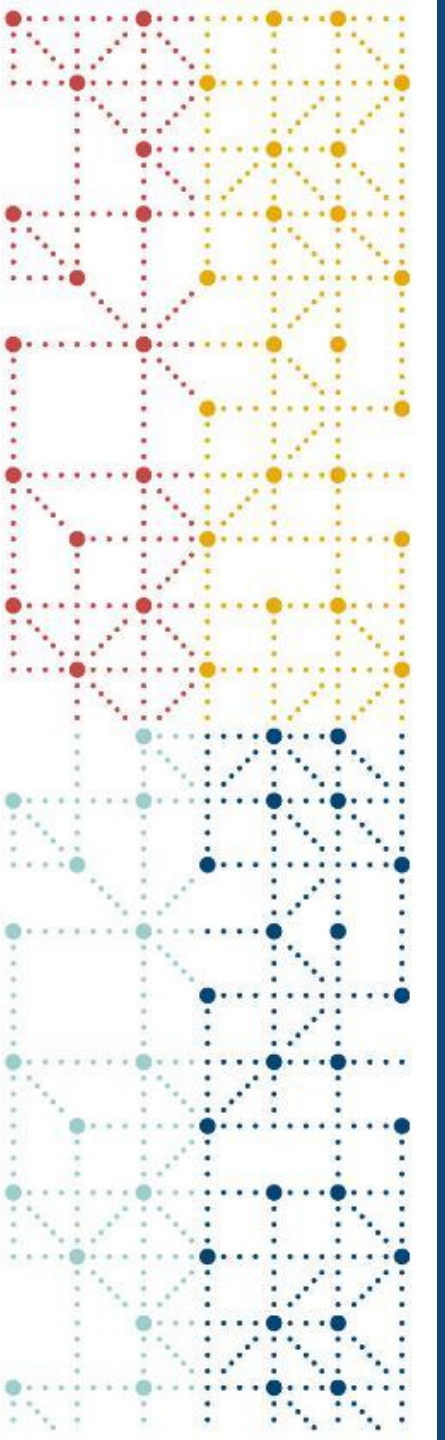
Discussion for further collaboration is ongoing, we are so excited!

NEW!

Donatella Ballerini • 1次
Driving Clinical Innovation @Montrium | TMF, ···
6日前 •

🚨 ATTENZIONE TMFers ITALIANI 🚨
👉 Questo post è solo per voi!

Quante volte vi è capitato di vivere questa scena?
Voi: "Mi occupo del Trial Master File, una raccolta vitale di documenti..."
Amici/parenti: (sguardo perso nel vuoto)
Voi (sospirando): "Lascia stare... è roba da matti, ma è fondamentale per l'Inspection Readiness!
Amici/parenti: altro sguardo perso nel vuoto...
Se vi ci ritrovate (ciao mamma 👋), allora siete nel posto giusto.
Noi TMFers siamo una specie rara e incompresa, ma fondamentale nel mondo Pharma.



Safety Information documentation in Japan

Why does Japan have so many records in TMF ?

Case Study

One day, I was reviewing Japanese Safety Information related records…

	04.03.01 Notification to IRB or IEC of Safety Information	05.04.09 Notification to Investigators of safety Information
US – 50 sites	24	2
Japan – 30 sites	4,052	12,252
Spain -18 sites	0	19
Germany – 17 sites	0	0
Italy -17 sites	0	66
South Korea	3,332	0

*The study started in 2017, the first safety record is dated in 2019

Let's deep dive In Regulatory Requirement

Yakkihou - Pharmaceutical and Medical Device Act Article 80-2, Paragraph 6

- Safety information from outside the clinical trial
- Post-marketing safety information for the same active ingredient in foreign countries

	2024年度（令和6年度）
2	203,932
4	1,302
8	202,630

GCP Ministerial Ordinance Article 20 (Information on Adverse Effects, etc.) Paragraph 3 - J GCP

- 'Sponsor must immediately notify investigator and head of medical institute…' = 'Immediately is translated as "2 weeks" in Japan

Ministory of Health, Labour and Welfare of Japan (21 Mar 2020) reported that due to the volume of safety information submitted to IRB, 'there are studies which PI and IRB deliberation on safety information is enormous.'

How Is the Safety Info Environment at Site?

Japan Pharmaceutical Manufacturers Association, (JPMA) (Jun 2020) pointed out that ‘There are many medical institutions that do not have a system for receiving information electronically.
It is common for them to provide materials in paper media for storage and distribution to IRB’

Let's Ask CJUG TMF Team Members!

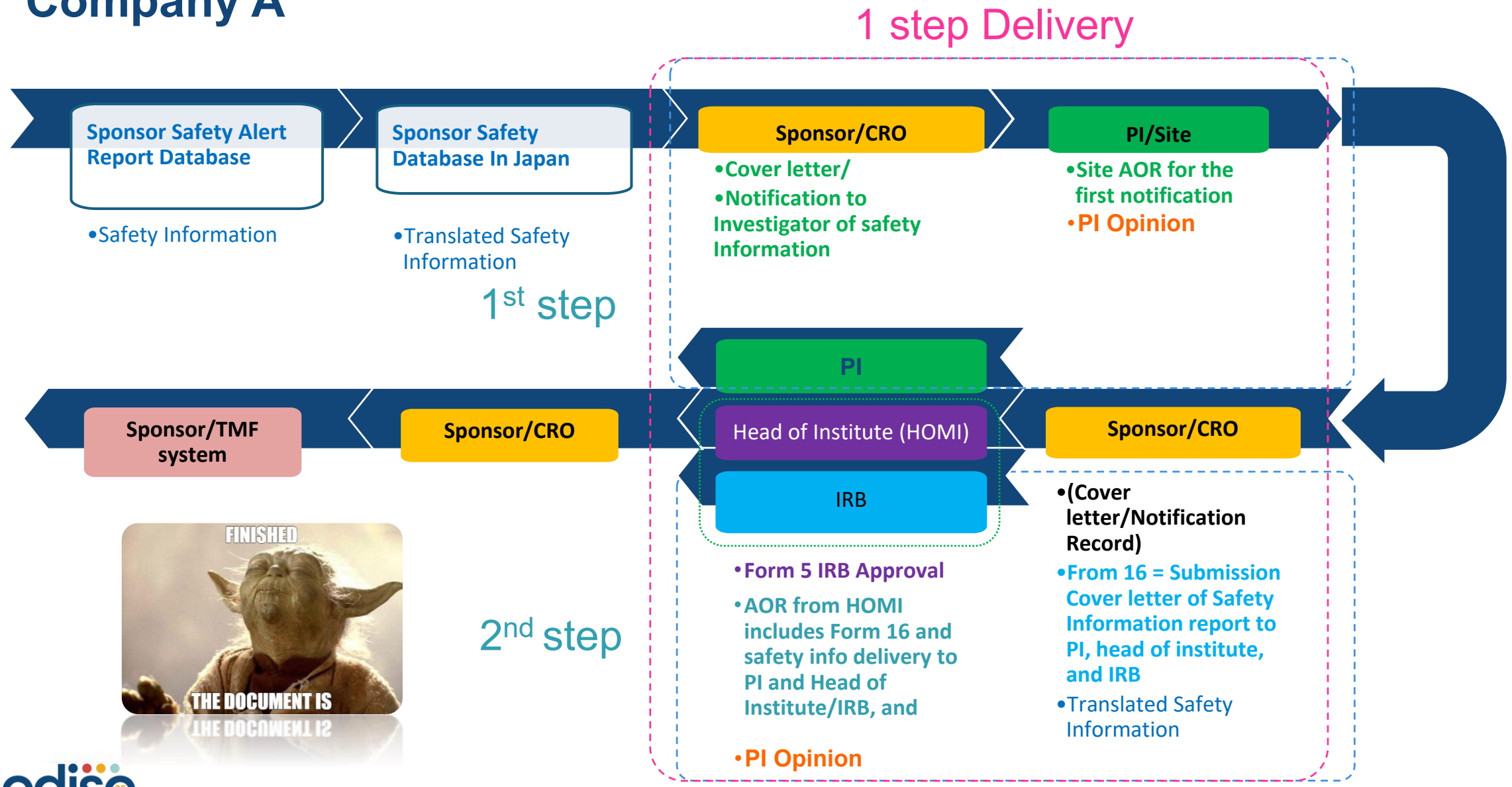
		04.03.01 Notification to IRB or IEC of Safety Info	05.04.09 Notification to Investigators of safety Info
My study 1 study Therapeutic area: Neurology Period: 6 years 4 months	Japan	**4,052**	**12,252**
	US	24	2
Company A: 1 study Therapeutic area: Neurology Period: 3 years	Japan	**1,293**	**1,151**
	US	1	2
Company B: 67 studies Therapeutic area: Period: 3 months	Japan	**48**	0
	US	0	0
Company C: 1 study Therapeutic area: Cardiology Period: 6 years 3 months	Japan	**52**	0
	US	0	4

Let's ask CJUG TMF Team Members! Continued

	05.04.09	05.05.01	04.01.01	04.03.01	04.04.01	07.03.01	04.01.02
Miyuki's study: 1 study, Neurology	Notification AOR PI Opinion Form 16*	Individual Notification		Cover Letter Form 16*		Individual Notification (2017-2018)	Form 5*
Company A 1study, Neurology	AOR of Form 16 includes PI Opinion			Form 16* Form 5*			
Company B	Notification			Form 16*	PI Opinion	List of Notification	From 5*
Company C		PI Opinion List of notification	Form 16*				Form 5*

*From 5 = IRB Approval, unified form in Japan
*Form 16 = Notification of safety information cover letter from Sponsor to PI/IRB/Head of Institute, unified form in Japan

Safety Information Delivery Process in My Understanding VS Company A



#ClearDataClearImpact

Is 1 Step Delivery Acceptable? The answer is…YES!

Q&A from JPMA Q&A (First publication; Apr 2019),

Question from CRO representative;
Is PI opinion required before sending the safety information to head of medical institute/IRB?

JPMA's Views;
If prior agreement has been obtained, Safety Information may be provided to PI, head of medical institution, and IRB at the same time… it is not stipulated by J GCP...
It should be carried out in accordance with the procedures of the sponsor, the medical institution or the IRB SOP…

1 step delivery = Reducing the # of records in TMF is possible!

Summary

Issues Outside TMF

1. Sponsor must immediately notify Safety Information to investigator and head of medical institute
2. Numerous report delivery in Japan
3. Medical Institutes' digitalization is in progress

Possible issues within TMF

1. 1 step or 2 steps delivery
2. Which records are kept in TMF?
3. Where to file the record according to the CDISC TMF RM?

# of document can be reduced... Let's discuss with CJUG TMF team!

References

- Ministory o Health, Labour and Welfare of Japan (21 Mar 2020).

  9th meeting of the study Group on Pharmaceutical Regulations for Strengthening Drug Discovery and Ensuring Stable Supply. *Further Clinical Trial Efficiency (Ecosystem), 7*

- Japan Pharmaceutical Manufacturers Association, (JPMA) Jun 2020

  Drug Evaluation Committee Clinical Evaluation Subcommittee2019 Task force 4, 2018 Task Form 5, *Examination on the handling of safety information during clinical trials in the era of internationalization of drug development.*

- Pharmaceuticals and medical Devices Agency, (PMDA)

  Number of reports of adverse reactions during clinical trials of drugs (total of first reports of adverse reactions and infectious disease case reports, reports of measures in foreign countries, research reports, etc.) *From 2014 to 2024*

- JPMA Q&A (First publication; Apr 2019)

  2019-02 Confirmation of Investigator's Opinion on Safety Information | Drug Evaluation Committee | Japan Pharmaceutical Manufacturers Association

Our way to go

Let's have

- To maintain **mutual communication in Japan**
- To have more interaction with global TME leaders
- In order to intake latest information/initiatives

Too Much Fun with us!

Thank You!
Arigato!