MOCK EXAMPLES OF WHEN A PRODUCT IS AN INVESTIGATIONAL PRODUCT AND WHEN A CLINICAL TRIAL AUTHORISATION IS REQUIRED

1. GENERAL EXAMPLES
2. EXAMPLES OF HEALTH RESEARCH INVOLVING E-CIGARETTES

GENERAL EXAMPLES

IMP/NIMP

Example 1

Trial Design:	An open label study in healthy volunteers to investigate the effects of rifampicin on the PK of RB0305
Purpose of Trial:	To investigate the effect of rifampicin on the PK of RB0305, a new agent for the treatment of TB acting by a novel mechanism
Products Administered:	RB0305 as an oral suspension Rifampicin as tablets
Key Parameters:	PK of RB0305 and of rifampicin
Product Classification:	RB0305 IMP Rifampicin IMP
Rationale:	Since both products are used in the same indication and may be co-administered, this is a PK study of the interaction of two medicinal products. The rifampicin is considered as an IMP, not a probe

Example 2

Trial Design:	An open label study in healthy volunteers to investigate the effects of rifampicin on the PK of T1B0308
Purpose of Trial:	To investigate the effect of rifampicin on the PK of T1B0308, a new lipid lowering agent
Products Administered:	T1B0308 as capsules Rifampicin as tablets
Key Parameters:	PK of T1B0308 and its effects on the PK of rifampicin
Product Classification:	T1B0308 IMP Rifampicin NIMP
Rationale:	Since the products are used in the different indications, this is a PK study to investigate the role of CYP 3A4 in the metabolism of T1B0308. The rifampicin is considered as a probe, not as an IMP

Example 3

Trial Design:	An open label study in healthy volunteers to investigate the effects of alcohol on the PD/PK of TW0907
Purpose of Trial:	To investigate the effect on PD and PK of TW0907, a novel anxiolytic which undergoes hepatic metabolism. The choice of alcohol is for two reasons – firstly because of its known physiological/ pharmacological effects including CNS effects and, secondly, because of its possible use in a social setting
Products Administered:	TW0907 as an oral suspension Alcohol as a commercial alcoholic beverage
Key Parameters:	PK of TW0907, PD of TW0907
Product Classification:	TW0907 IMP Alcohol NIMP
Rationale:	TW-0907 is the medicinal product under clinical investigation therefore it is an IMP. Alcoholic beverages are not medicinal products hence the alcohol is a NIMP.

Example 4

Trial Design:	An open label study in healthy volunteers to investigate the determine the PK/receptor occupancy of S1F0493
Purpose of Trial:	To investigate the PK, including receptor occupancy, of S1F0493, a novel antidepressant TW0907, a novel antidepressant.
Products Administered:	S1F0493 as a capsule [11C] AB1234 as an intravenous injection
Key Parameters:	PK of S1F0493, receptor occupancy by S1F0493
Product Classification:	S1F0493 IMP [11C] AB1234 NIMP
Rationale:	S1F0493 is the medicinal product under clinical investigation therefore it is an IMP. [11C] AB1234 intravenous injection is the PET ligand to enable receptor occupancy to be determined. Since it is not being developed as a medicinal product or as a diagnostic agent, it is not an IMP

Example 5

Trial Design:	A study in healthy volunteers to validate the hand immersion in cold water model of pain
Purpose of Trial:	To investigate the variability of the pain producing effect of hand immersion in cold water on an inert and intra-subject basis
Products Administered:	None
Key Parameters:	The reproducibility of pain production both within and between subjects
Product Classification:	No medicinal products are administered
Rationale:	Since no medicinal products are being administered, this is not a clinical trial within the scope of the Clinical Trials Directive

Example 6

Trial Design:	Administration of capsaicin and morphine to healthy volunteers
Purpose of Trial:	A method validation study using capsaicin as a pharmacological agent to induce pain and morphine as a positive control
Products Administered:	Capsaicin as a solution for injection Morphine sulphate as a solution for injection Naloxone as a solution for injection
Key Parameters:	To determine the extent, reproducibility and reversibility of the pain produced, using morphine sulphate as a positive control
Product Classification:	Capsaicin NIMP Morphine sulphate NIMP Naloxone NIMP
Rationale:	This is a study to validate the pain inducing effect of capsaicin using a known analgesic as a positive control. The capsaicin is being used to induce pain by pharmacological means and is not an IMP. Since the morphine sulphate is being used as a positive control within the method validation, it is not regarded as an IMP for the purposes of the study. The naloxone is used to prevent unwanted opioid effects and is not an IMP. Since no investigational medicinal products are being administered, this is not a clinical trial within the scope of the Clinical Trials Directive

Example 7

Trial Design:	Administration of capsaicin, morphine and T2B0308 to healthy volunteers
Purpose of Trial:	A study to investigate the effect of T2B0308, a novel analgesic, in the capsaicin pain model
Products Administered:	T2B0308 as a capsule Capsaicin as a solution for injection
Key Parameters:	To determine the efficacy of T2B0308 in reducing the pain induced by capsaicin
Product Classification:	T2B0308 IMP Capsaicin NIMP
Rationale:	Since T2B0308 is a novel analgesic agent, it is an investigational medicinal product.. The capsaicin is being used to induce pain by pharmacological means and is not an IMP.

EXAMPLES OF HEALTH RESEARCH INVOLVING E-CIGARETTES

An e-cigarette which is a consumer product regulated by the Tobacco Products Directive 2014/40/EU (TPD) is not a medicinal product and this product would not be considered an investigational medicinal product (IMP) in health/clinical research. This does not mean that a study that includes a TPD regulated e-cigarette would not require a clinical trial authorisation (CTA) in some circumstances.

1. **Is an e-cigarette regulated by the TPD as a consumer product effective in smoking reduction/cessation?**

   Not a clinical trial of an IMP.

   (Note the manufacturer of the e-cigarette cannot make any medical claims for their product based on the results of the study and the data may not be admissible as pivotal data to support any future marketing authorisation application to market their product as a medicine (if that is their intent))

2. **Is an e-cigarette regulated by the TPD as a consumer product as effective as a nicotine patch in smoking reduction/cessation?**

   This is a clinical trial of a consumer product VS a medicinal product. A CTA will be required. The nicotine patch is an IMP; the e-cigarette is not an IMP. The manufacturer of the e-cigarette cannot make any medicinal claims for their product based on the results of the study and the data may not be admissible as pivotal data to support any future marketing authorisation application to market their product as a medicine (if that is their intent)

3. **A PK study of nicotine levels in people using e-cigarettes**

   Not a trial of an IMP if the e-cigarette is a TPD regulated consumer product. The study will be a clinical trial of an IMP if the e-cigarette is a medicine or is being developed as a medicine. (If not regulated as a clinical trial then the data may not be used as pivotal data to support a Marketing Authorisation application in future if that is the manufacturer's intent.)

4. **Are TPD regulated e-cigarettes "safer"/healthier than 'normal' cigarettes**

   Not a clinical trial of an IMP