外資系企業における製造販売後調査（PMS）の傾向
～ PhRMA / EFPIA 合同調査結果より ～

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COI開示：演題発表内容に関連し、発表者らに開示すべき利益相反はありません。

【目的】PhRMA及びEFPIA加盟会社における製造販売後調査（PMS）実施状況について調査を行い，外資系企業での近年のPMSの傾向やその変化を分析するとともに今後の展望を考察する。

【方法】PhRMA加盟会社及びEFPIA薬事部会加盟会社を対象に，2024年度（2024年4月～2025年3月）に承認された新医薬品のPMSの実施状況について，2025年4月にアンケート調査を実施し，集計結果に基づき分析した。また，過去と同じ調査項目の経年的な傾向に加え，DB調査やレジストリを利用した調査，PMSを行う理由/行わない理由，調査実施に至った経緯，全例調査の動向，調査のモニタリング体制，同意の取得，調査結果の公表に関する外資系企業の状況をまとめた。

【結果】

◆加盟会社のうち，22社よりPMSに関する回答を得た。2024年度，対象企業でのPMSは承認品目73品目中34品目（47%）で実施することとなった。この実施割合は，前年（80%）に比べ大きく減少している。PMSを行う理由で一番多いものは明確なリサーチクエスチョンがあるためであり、PMSを行わない理由で一番多いものは海外を含め相応の安全性情報があるためであった。実施するPMS（34調査）のうち，特定使用成績調査は50%（17調査），データベース調査は32%（11調査），一般使用成績調査は18%（6調査）であり，2024年度も使用成績比較調査は実施されなかった。承認品目に対する調査種類の傾向については，2024年はデータベース調査が前年より増えていた。

◆全例調査は8品目8調査あり，2024年度に承認された品目で使用成績調査（一般使用成績調査，特定使用成績調査）を実施することになったうちの35%を占める結果であった。

◆2024年度，データベース調査を実施することとなった11調査のうち，6調査は企業からの提案で，5調査は規制当局との協議の上で実施された。利用予定のデータベースは，1調査がレジストリ，1調査がMID-NET、7調査が商用データベースを予定していた。2調査はまだ未決定であった。

◆上述以外にも，PMS調査の概要として，目標症例数・調査期間や費用のトレンドや初回申請時の照会事項発出時期や実施計画書等の合意時期についても調査結果の発表を行う。

Trends in Post-Marketing Surveillance (PMS) in Foreign-Affiliated Companies

~ From the results of a joint PhRMA / EFPIA survey ~

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Objective: This study aimed to investigate the implementation status of post-marketing surveillance (PMS) at PhRMA and EFPIA member companies, analyze recent trends and changes in PMS at foreign-affiliated companies, and consider future prospects.

Methods: A questionnaire survey was conducted in April 2025 on the implementation status of PMS in FY2024 (April 2024 ~ March 2025) for PhRMA member companies and EFPIA Pharmaceutical Affairs Committee member companies, and the results were analyzed based on the aggregate results. In addition to the longitudinal trends of the same survey items as in the past, we also summarized the trends of DB surveys, registries-based surveys, and all-case surveys, reasons for conducting or not conducting PMS, background and rationale for conducting the survey, survey monitoring systems, obtaining consent, and publishing the results of surveys.

Results and Discussion

Among the member companies, 22 companies responded regarding PMS. In FY2024, PMS was implemented for 34 (47%) of the 73 approved items at those companies. The implementation rate has substantially decreased compared to the previous year (80%). The most common reason for not conducting PMS was the availability of sufficient safety data, including information from international sources. Of the PMS surveys (out of 34 surveys), 50% (17 surveys) were specific use performance surveys, 18% (6 surveys) were general use performance surveys, and 32% (11 surveys) were database surveys. In FY2024, no comparative survey was conducted. In 2024, database surveys were increased in the trend of survey types for approved items compared to the previous year.

There were 8 all-case surveys for 8 items. This was 35% of the surveys (general use performance survey, specific use performance survey) to be conducted for items approved in FY2024. Of the 8 studies, 5 were for rare disease drugs. In FY2024, 3 companies had their approval conditions lifted for all-case surveys, and the period from the start of negotiations with the regulatory authorities to the lifting of the approval conditions was 24 months or more (1 company), and 18 months to 24 months (2 companies), respectively.

Of the 11 database surveys that were to be conducted in FY2024, 6 were proposed by companies and 5 were conducted upon consultation with regulatory authorities. In addition, there was 1 survey in which the company had initially proposed a database survey, but as a result of discussions with regulatory authorities, changed to a survey other than a database survey. Of the 11 database surveys, 1 study planned to use a registry, 1 study with MID-NET, 7 studies with commercial databases and 2 studies were undecided yet. In addition, after conducting the database survey, 11 companies responded that there was a gap from the initial assumptions, and the main gaps were increased resources (3 companies), increased costs (4 companies) and the number of eligible cases were limited (2 companies).

Of the 20 companies conducting the all-case survey, 15 (75%) obtained some kind of consent in the all-case survey, and 14 (93%) on academic conferences and paper presentations, 12 (80%) on secondary use of data, and 3(20%) on participation in the survey.

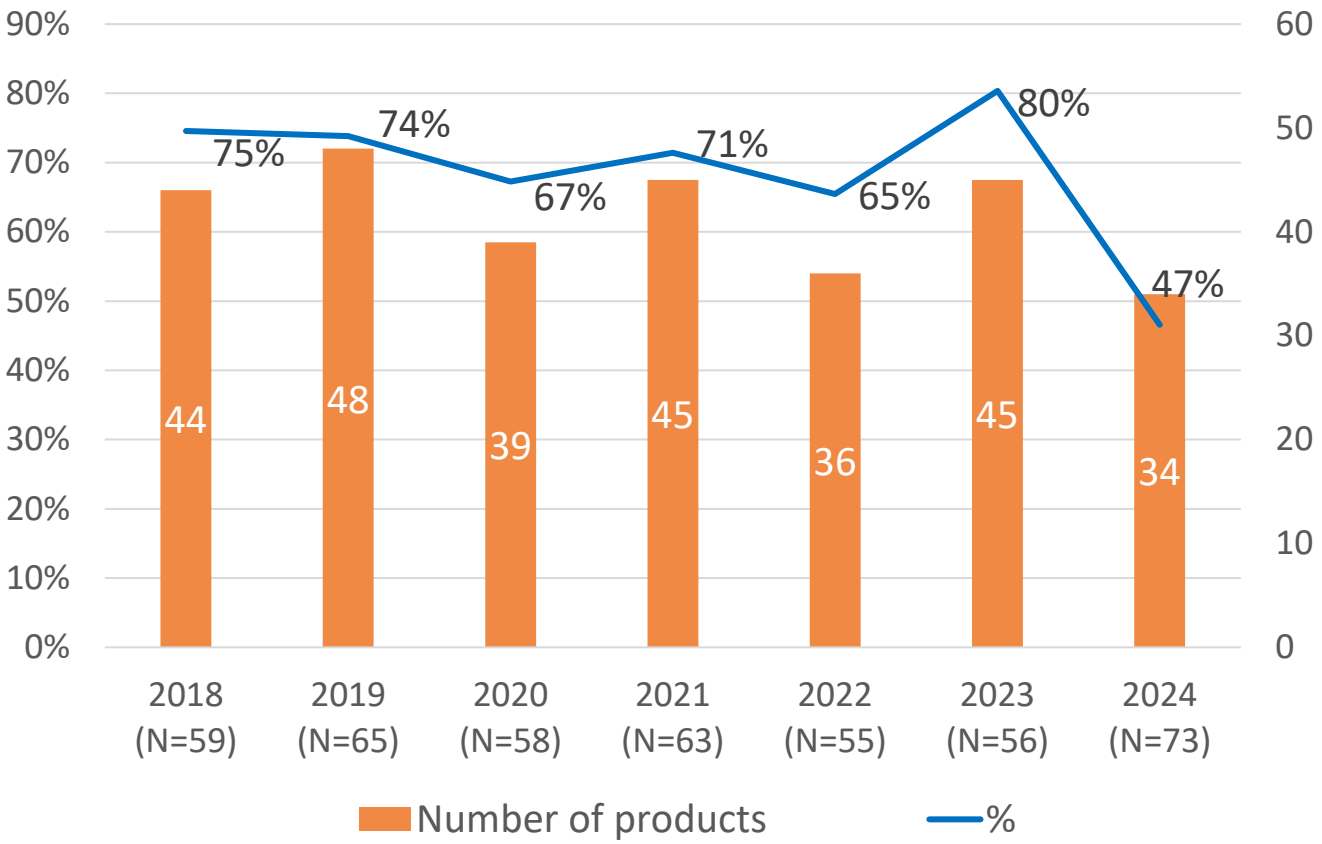
Regarding the publication of PMS results, although it may vary from survey to survey, many companies had a process for disclosing at academic conferences or publications. In 67% of the companies, the PMS department reported the results not only at the end of the survey, but also at the interim. At foreign-affiliated companies, a pronounced trend to proactively publish the results of PMS as interim and final reports, including obtaining consent to publish the results was observed, as in the previous year.

In addition to the above, we plan to present the results of the survey as an overview of the PMS survey, on trends in the target number of cases, survey period, and cost, as well as the timing of issuance of inquiries at the time of initial application and the time of agreement on the implementation plan.

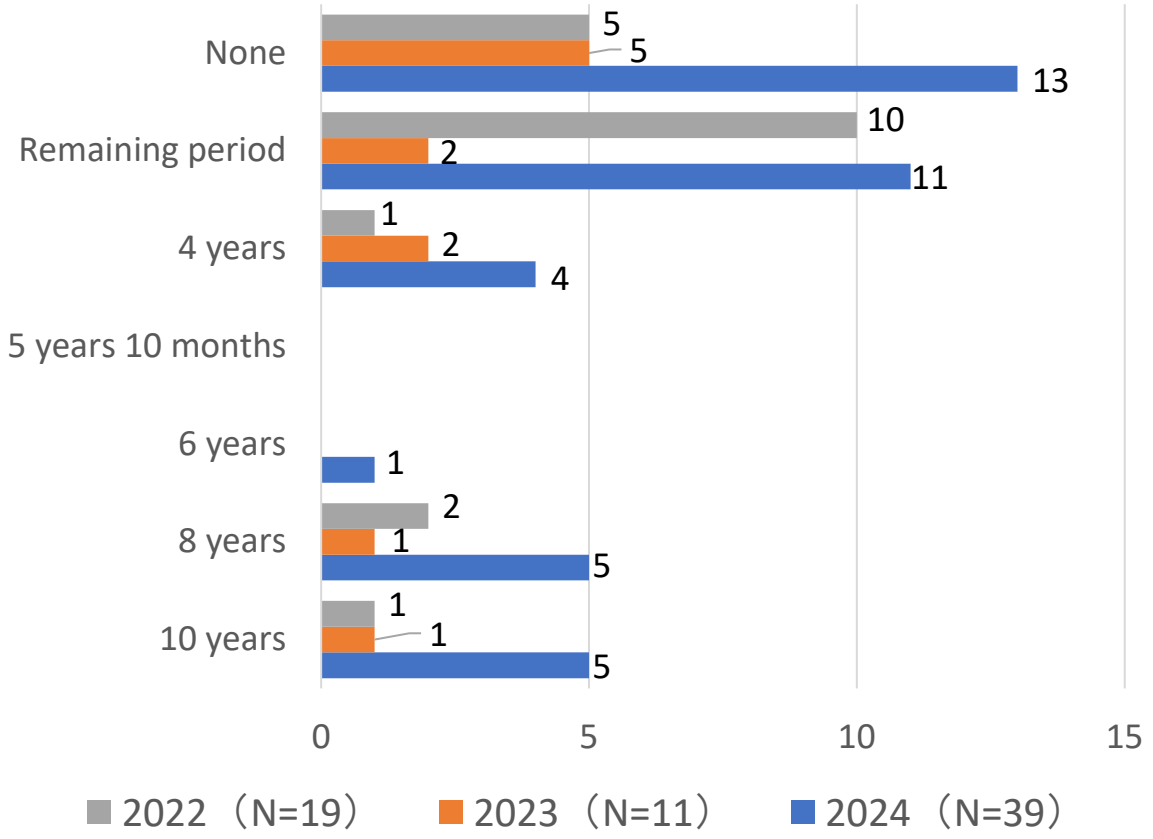
〈1〉

PMS

PMS conduct number and rate for approval products



Re-examination period for No PMS products

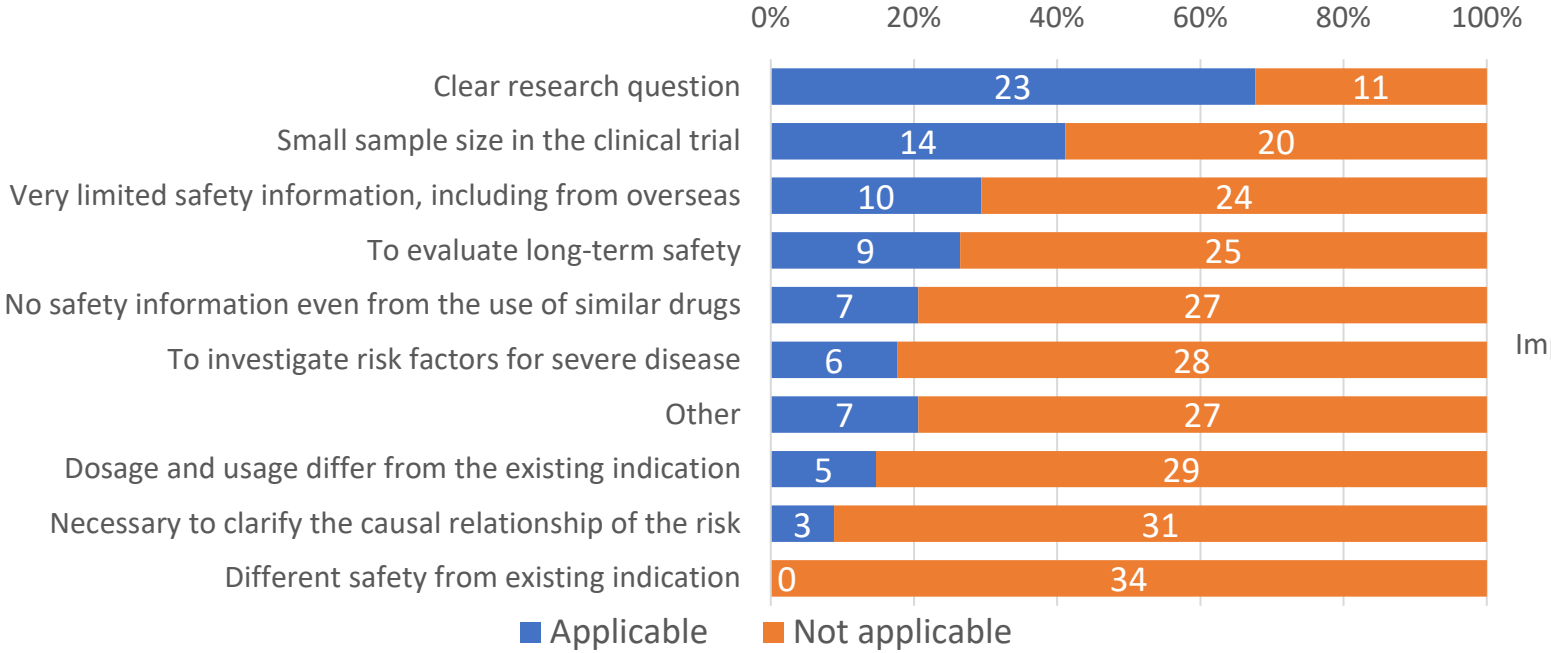


- PMS was conducted for 47% of approved drugs.
- 15 of the 39 products with No PMS were granted a new reexamination.
- The most common reason for PMS was because there was a clear research question, while the most common reason for not PMS was because there was reasonable safety information, including from abroad.

〈2〉

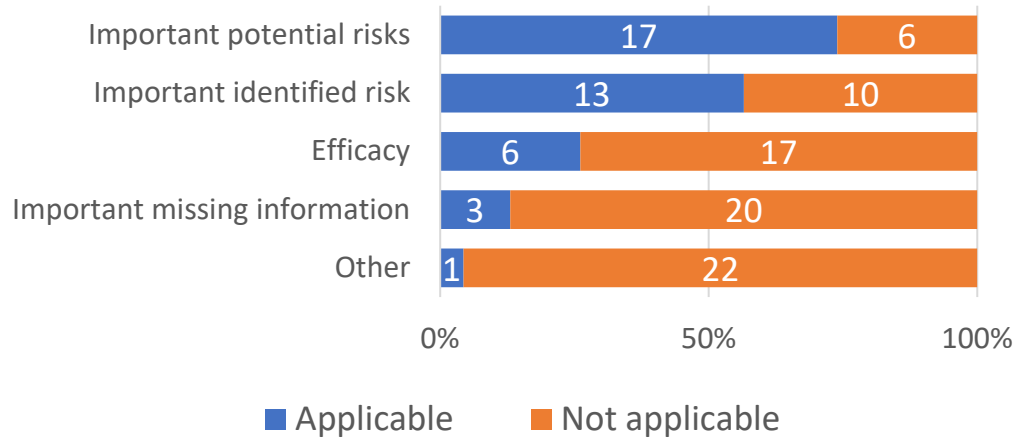
Reasons for conducting/not conducting PMS

Reasons for conducting PMS (N=34)

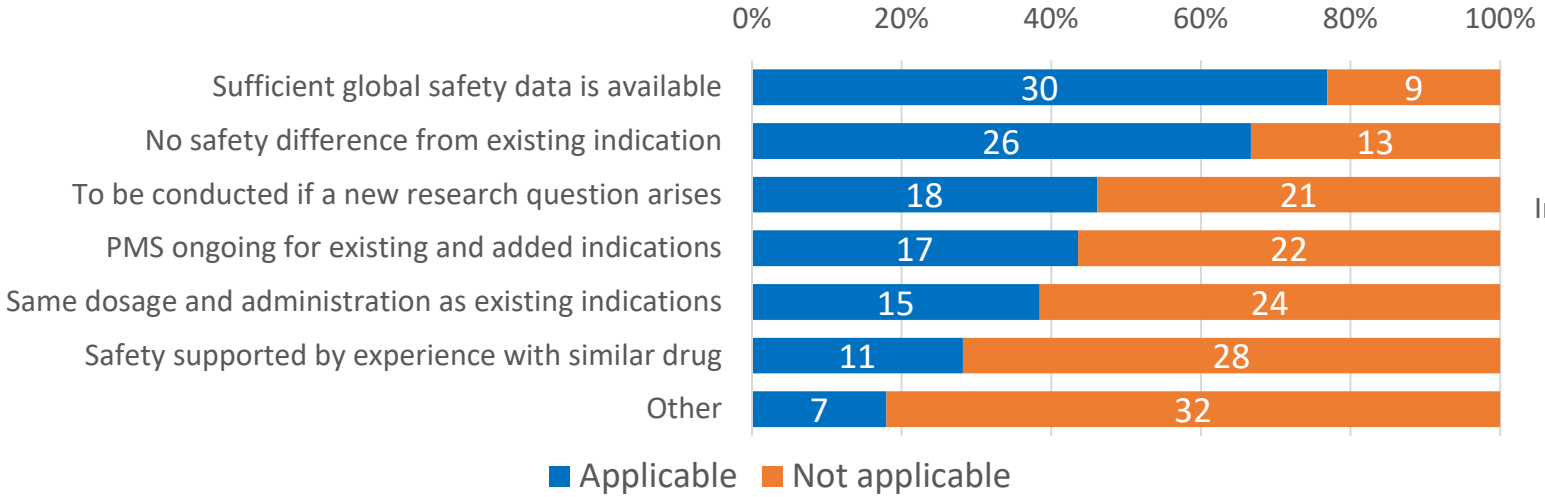


The relevant section of the RMP that led to the implementation of the study (N=23)

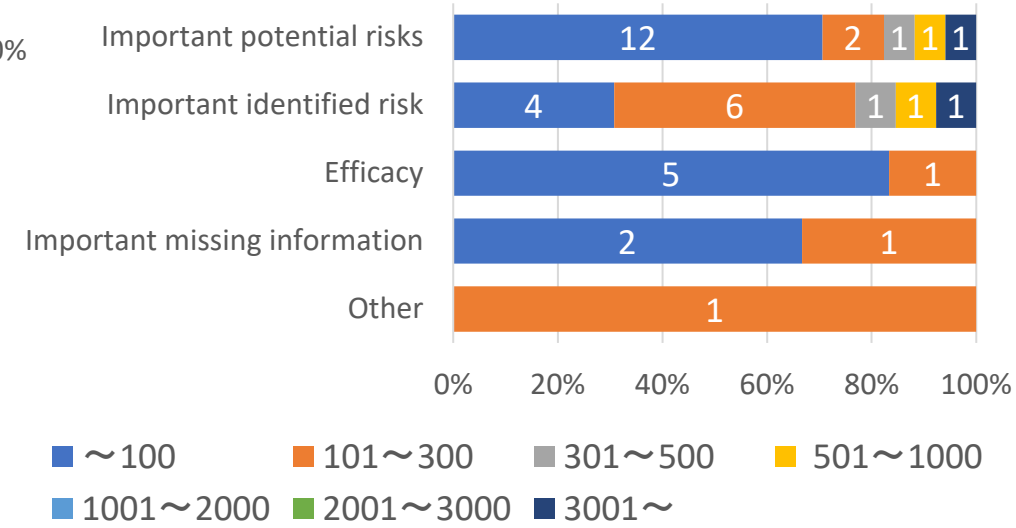
*** multiple answers allowed**



Reasons for not conducting PMS (N=39)

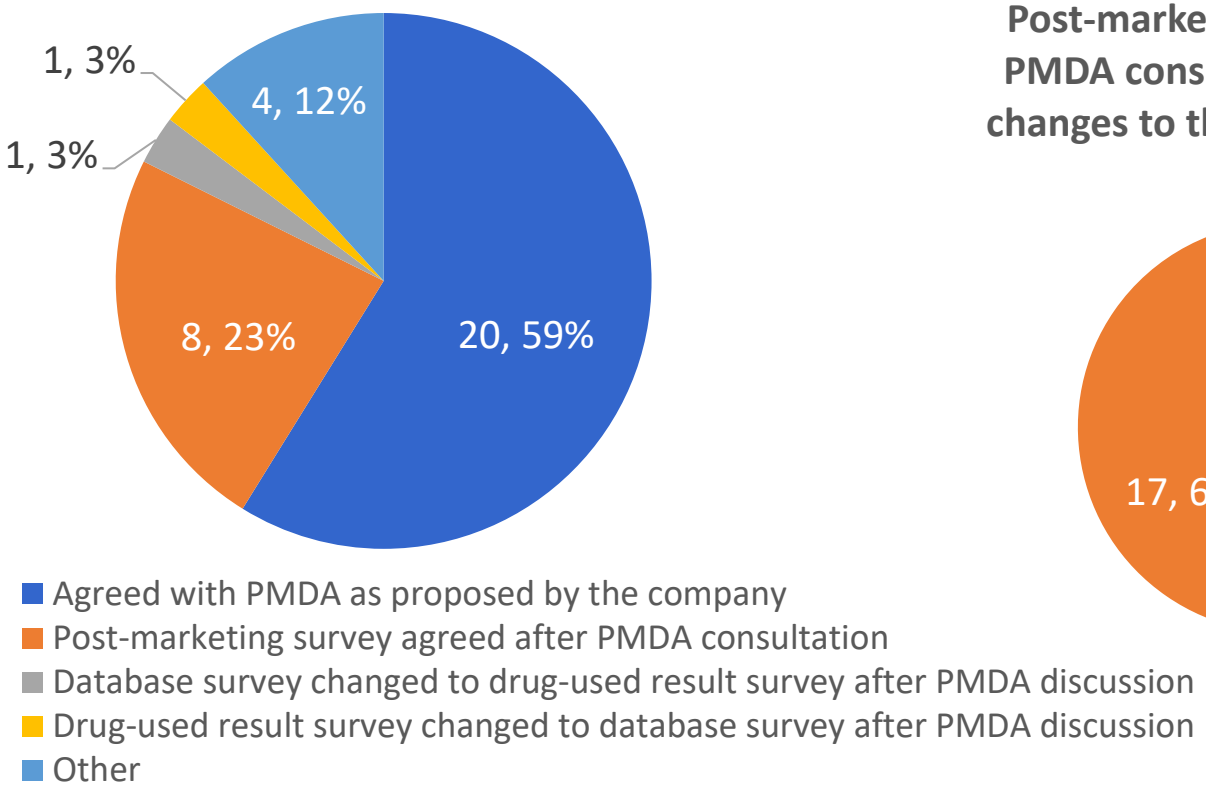


Distribution by number of cases

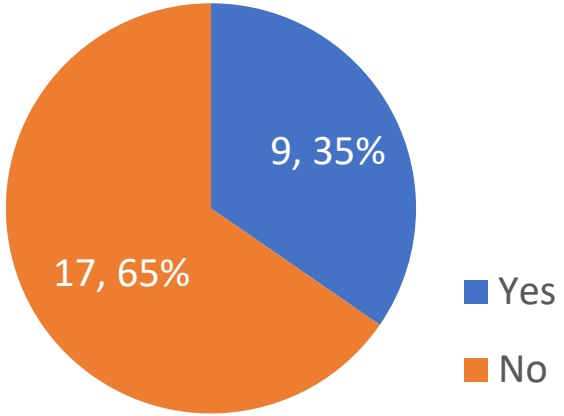


Background to the PMS

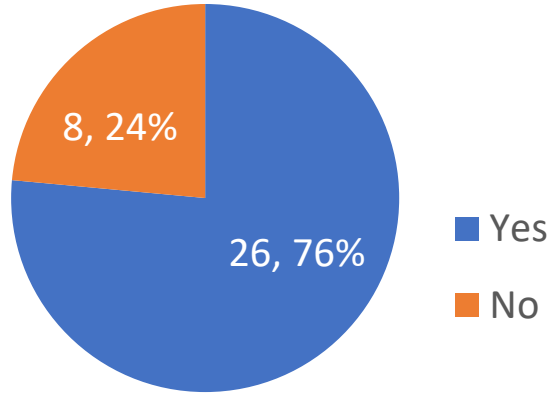
Reason for conducting the survey (N=34)



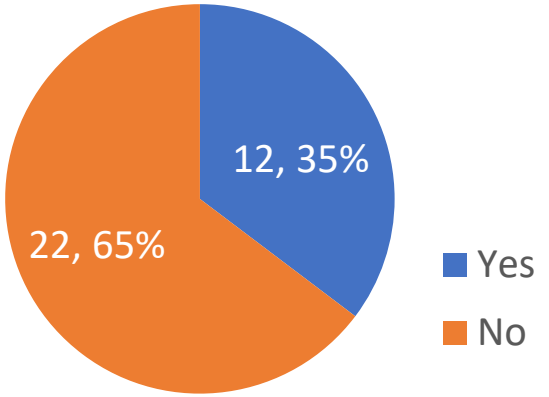
If you selected an option other than 'Post-marketing survey agreed after PMDA consultation' were there any changes to the safety considerations? (N=26)



Was this safety concern part of the risks proposed at (s)NDA submission? (N=34)

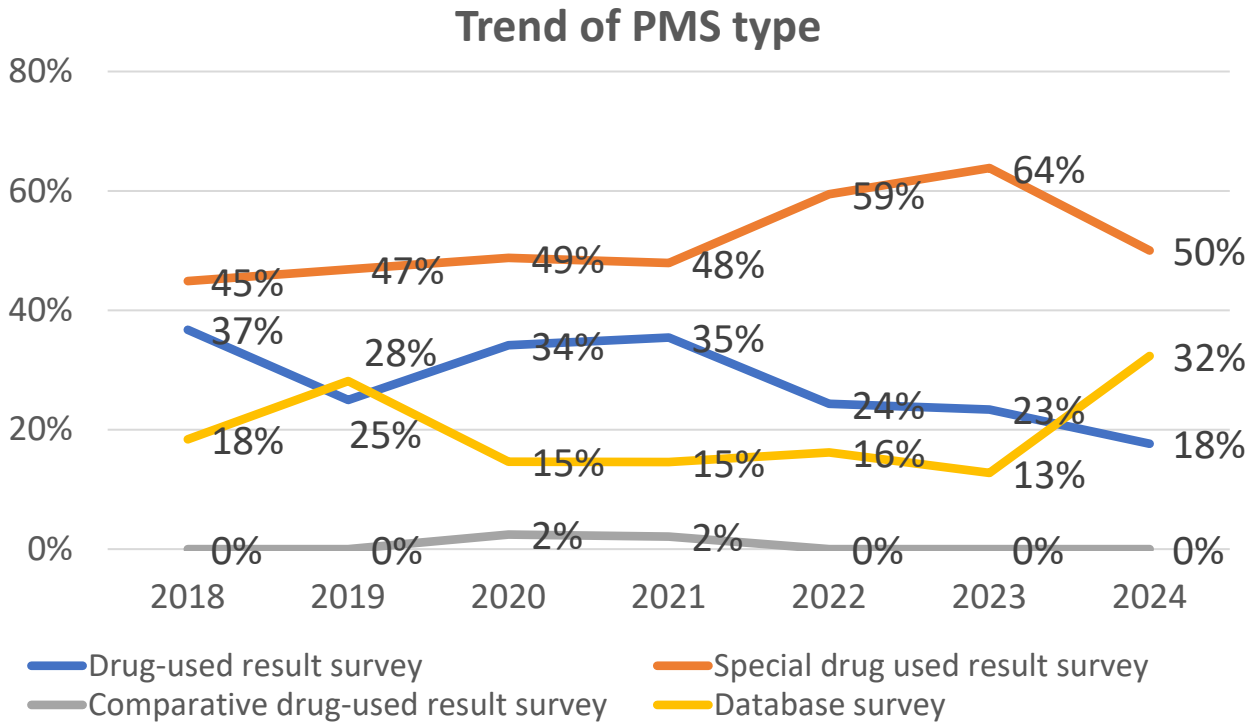


Was the safety concern a new risk added during the approval review process? (N=34)

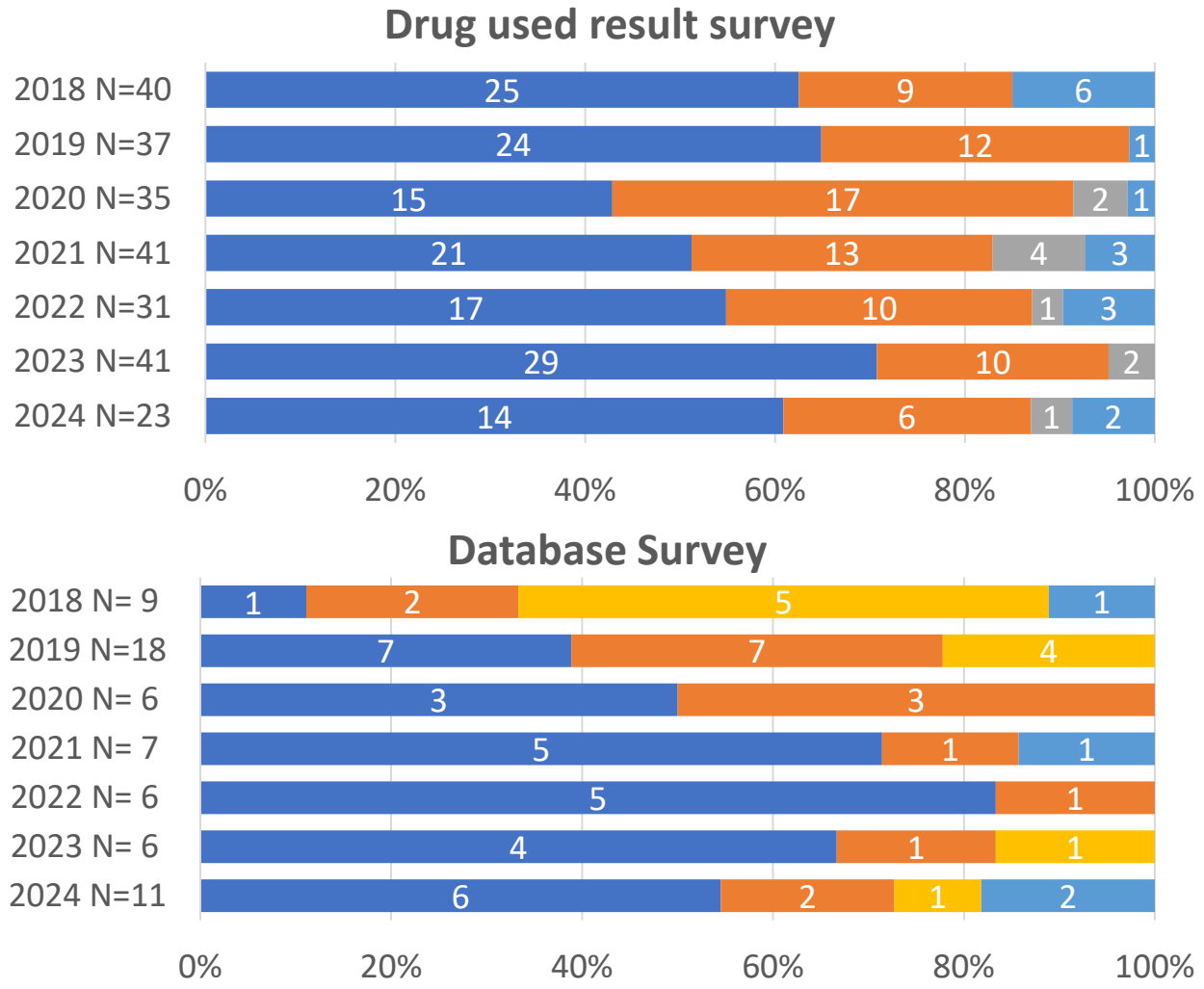


- 59% of the proposals were implemented as proposed by companies.
- Safety considerations have changed in 35% of cases where it was decided to implement the consultation.
- 35% of safety considerations added during the approval review process.

PMS type trend and Background

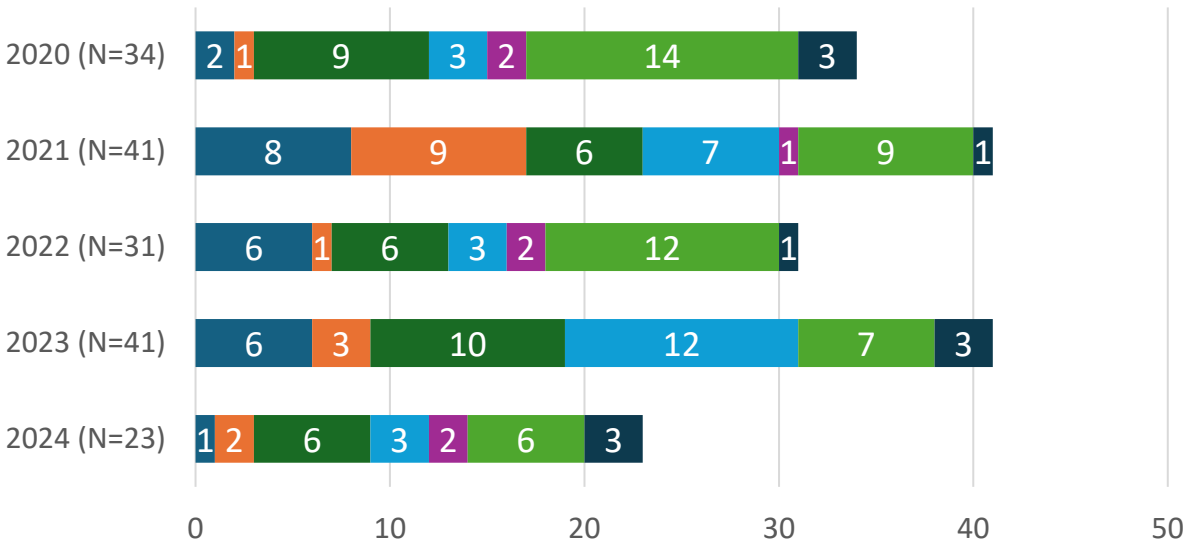


- The proportion of database surveys increased and the specific drug-used result survey decreased.
- Of the 11 DB surveys, two were conducted after con sultation with PMDA.
- The one survey is the cases of a DB survey being proposed, but it was later concluded to conduct a drug-used survey after discussion with PMDA.

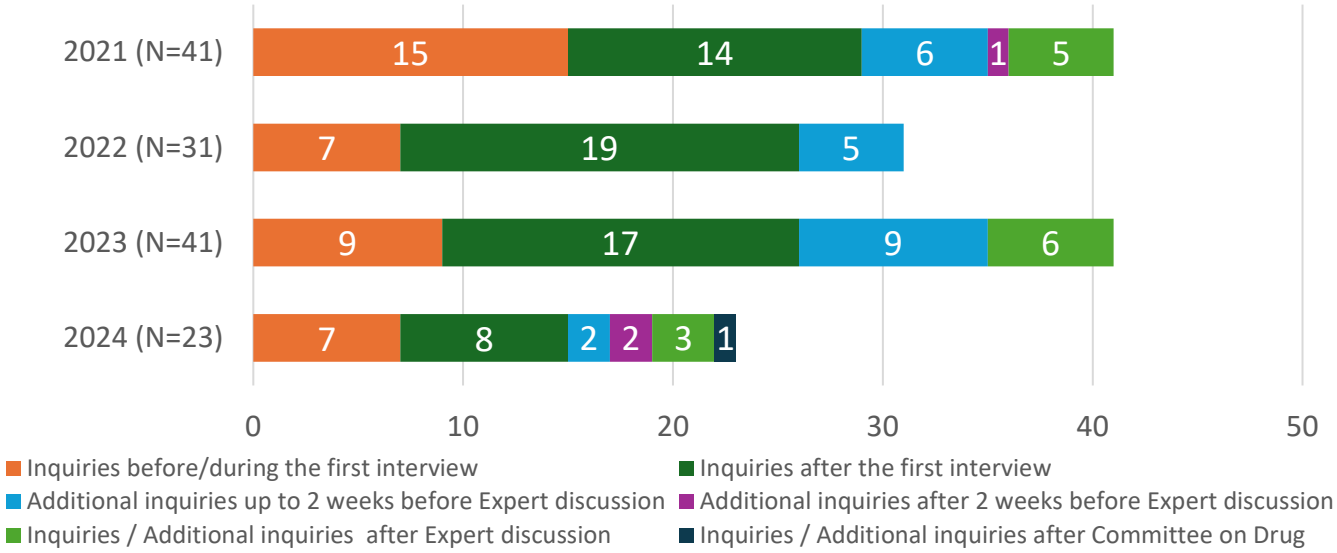


〈5〉 PMDA interaction timing in drug-used result surveys

First submission of protocol to PMDA

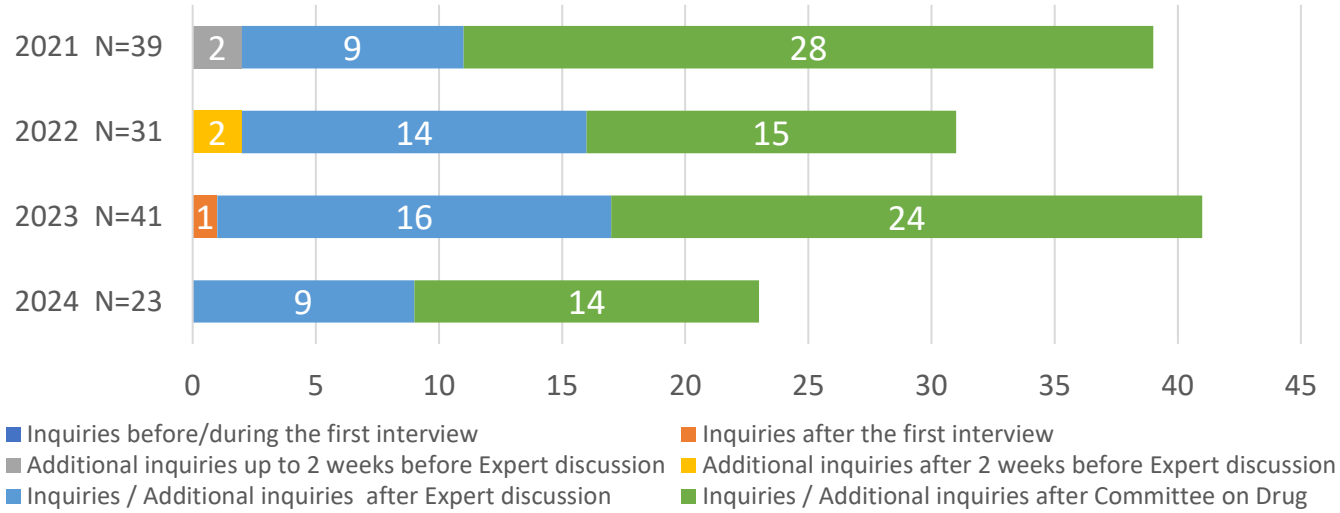


First inquiries regarding the survey



- 13% of the surveys had submitted protocols by the time of the first interview.
- More than 65% of the first inquiries related to PMS were issued by the time of inquiries after first interview.
- In 60% of the surveys, the protocols, registration forms, and survey forms were agreed with PMDA after Committee on Drug.

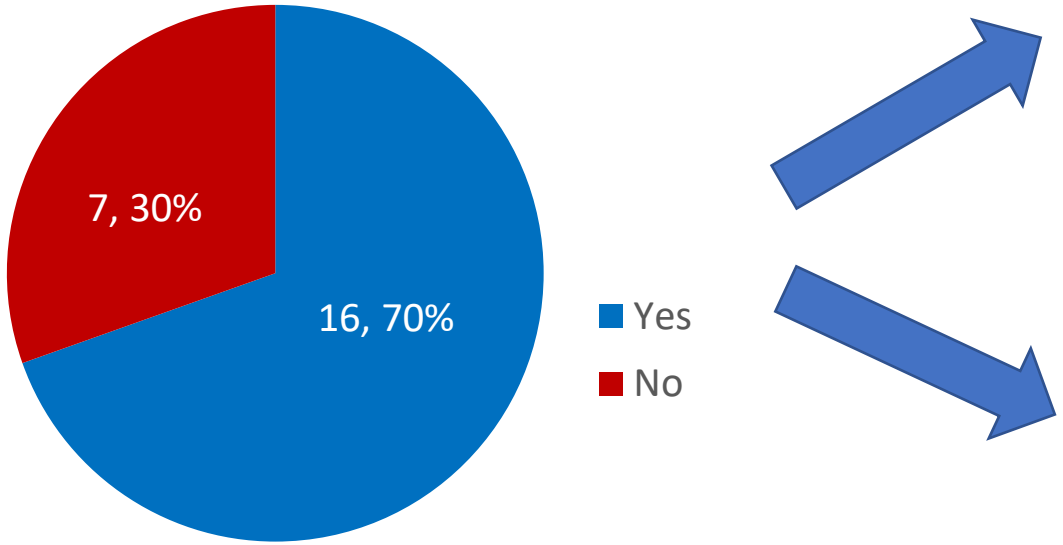
Making agreement with PMDA about protocol, registration form and CRF



Drug-used result survey PMDA interaction -inquiries timing-

The queries requesting revisions to the implementation or design of RMP post-marketing surveillance (N=23)

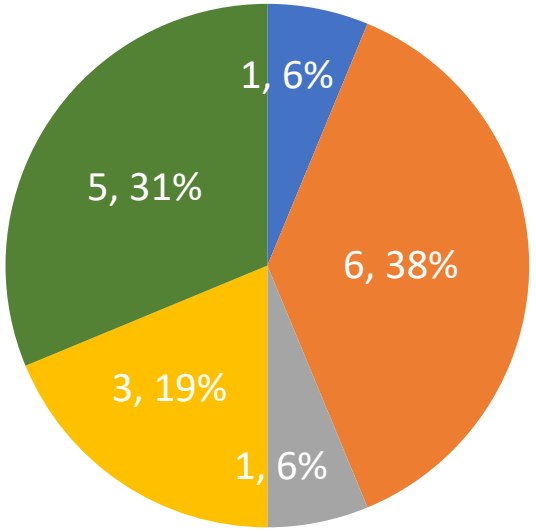
(ex: number of cases, study design, etc., which have a significant impact on the company's budget)



- In 70% of the cases, received inquiries affected the budget.
- In 62% of cases, inquiries were issued after expert meeting.

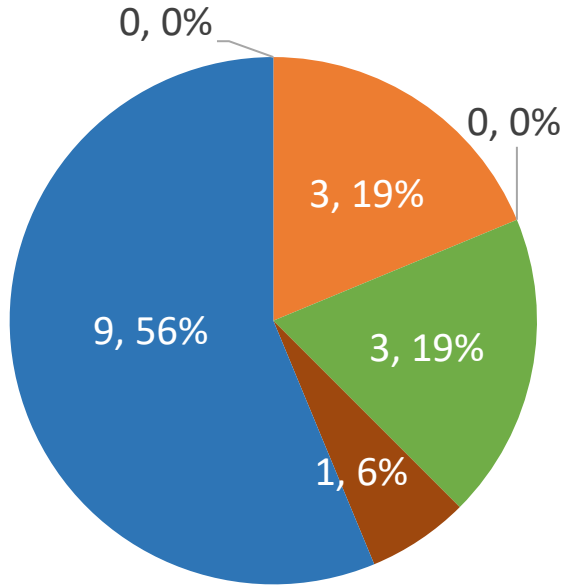
Item of inquiry(N=16)

- Setting a control group for comparison
- Increase in the number of cases
- Extension of the survey period
- Modification of safety infomration to be collected
- Other



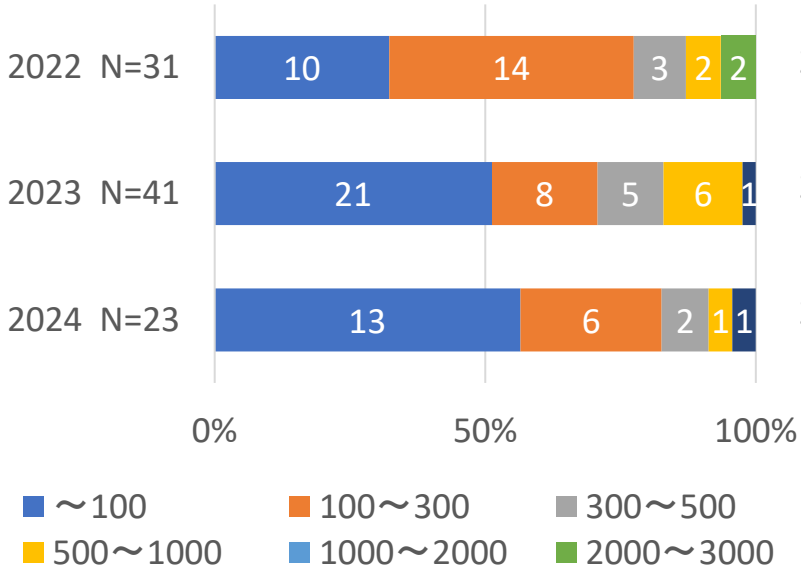
Timing of first inquiry （N=16）

- Initial interview
- After initial interview (0 cases)
- Within 2weeks before expert meeting
- Within 2weeks after expert meeting
- After expert meeting
- BUKAI meeting (0 cases)

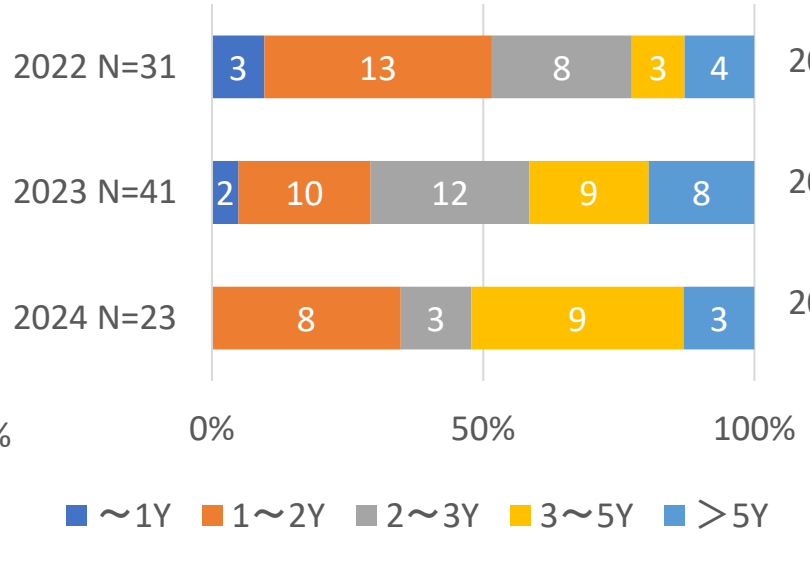


Drug-used/Special Drug-used result survey
-Survey number patients, period and cost-

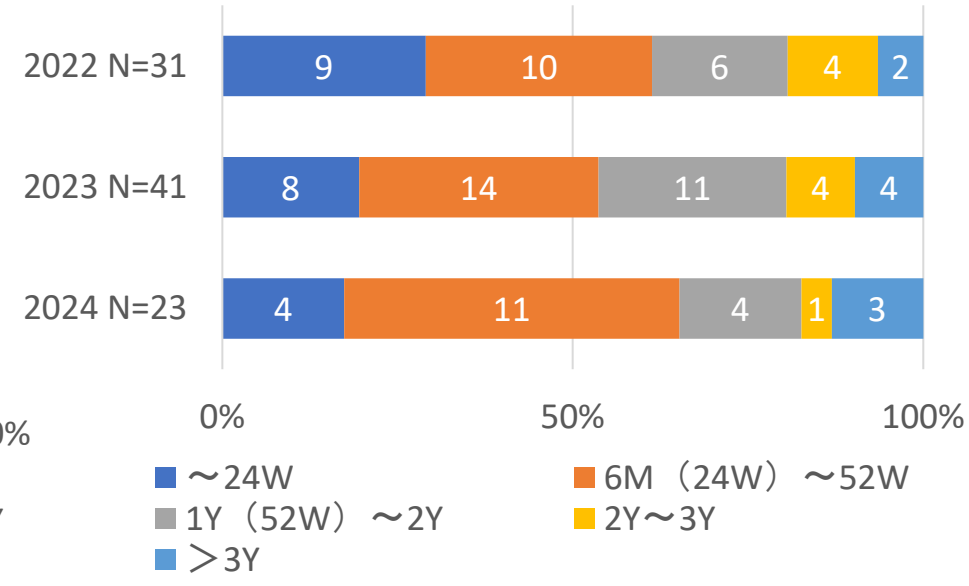
Number patients per PMS



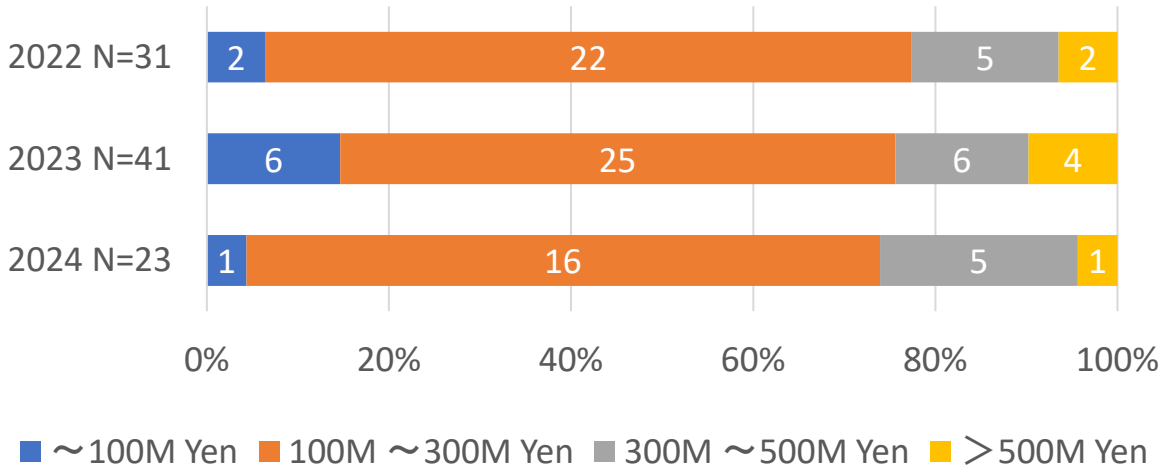
Enrollment period



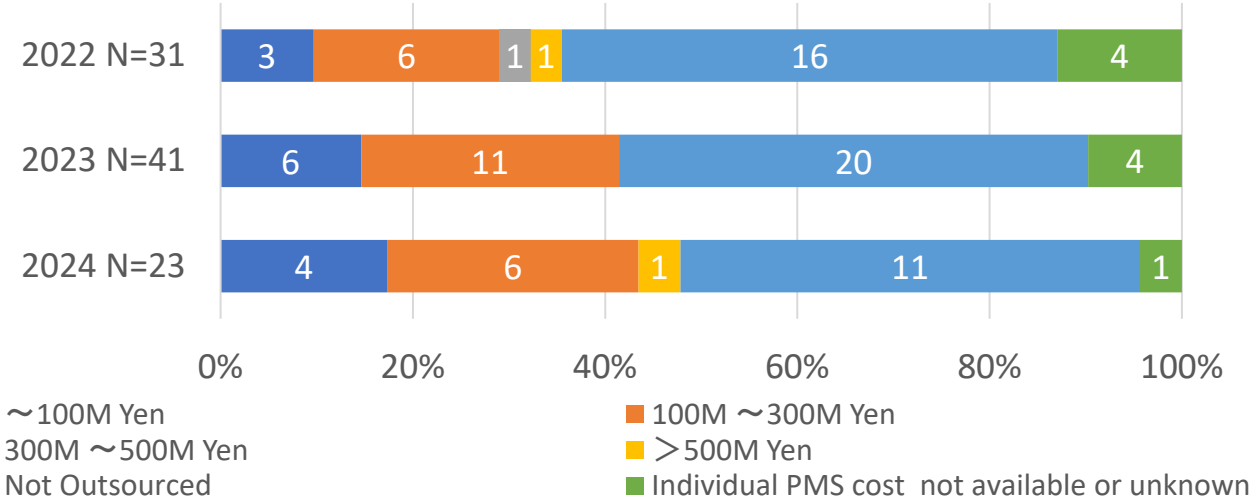
Observation Period per Patient



Cost of PMS (excluding of monitoring cost)



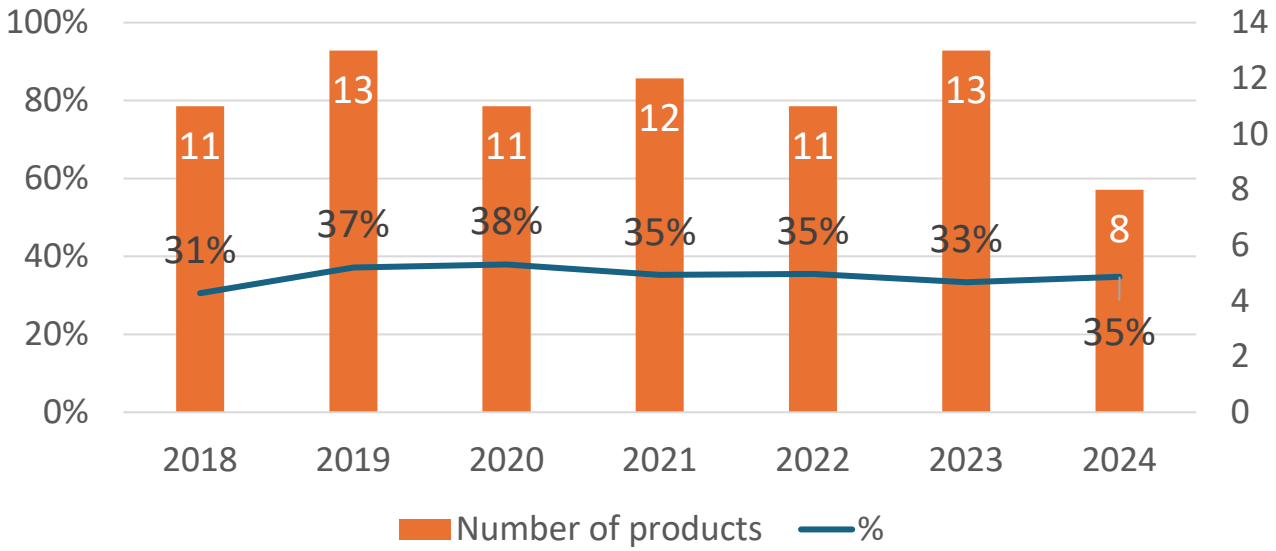
Monitoring Cost



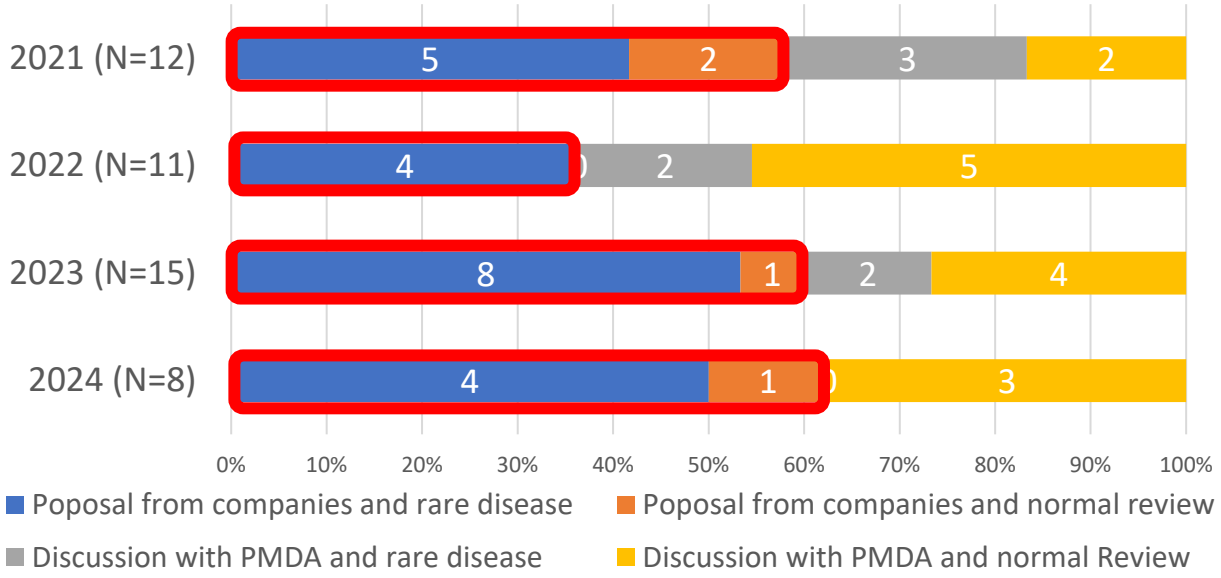
All case survey trend

Proposal from companies

All-case PMS product / rate (per Drug used result survey products)

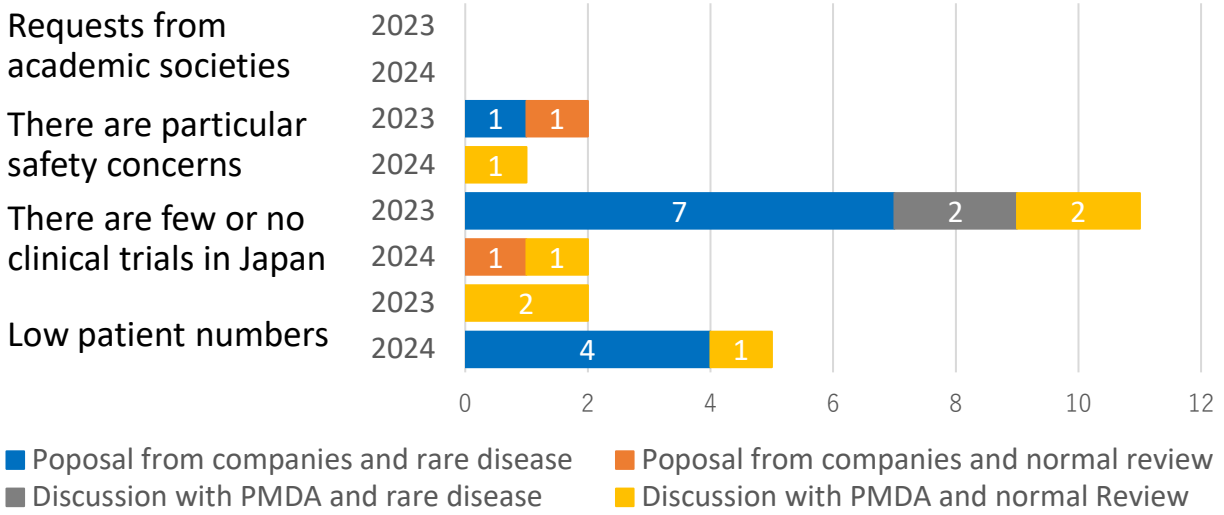


All-case survey trend (per protocol)



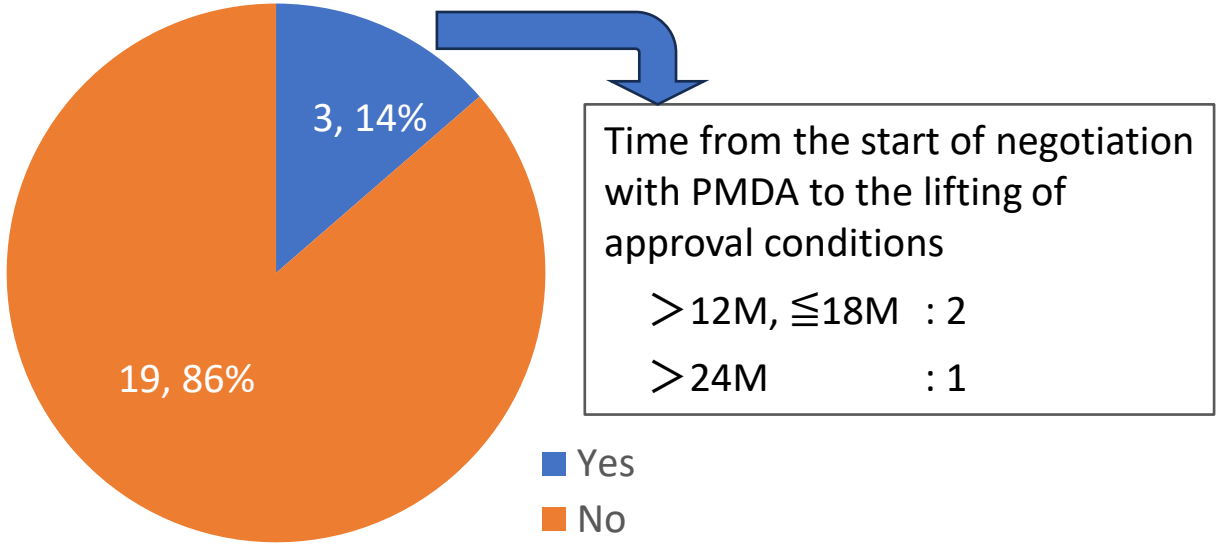
- More than one-third of the drug used results surveys conducted were all-case survey. The trends haven't changed significantly.
- The main reason companies proposed all-case survey was because the disease was rare and the number of cases was small.

Reasons for all-case survey



All case survey
-Lifting of approval conditions and implementation-

Lifted the condition for approval of all-case survey from 2024/04 to 2025/03 (N=22)

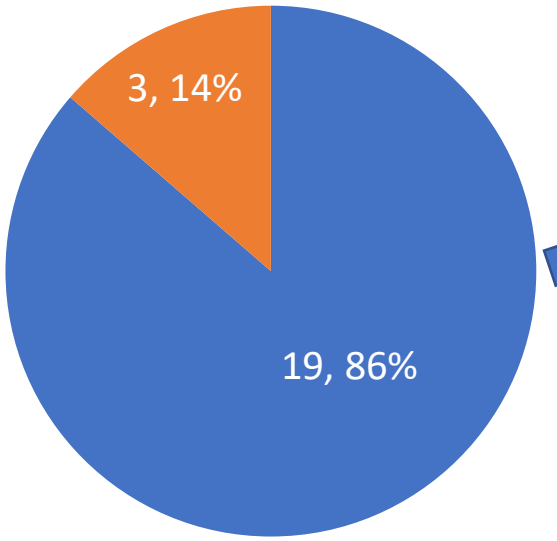


Time from the start of negotiation with PMDA to the lifting of approval conditions

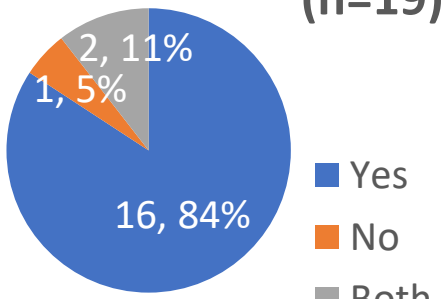
＞12M, ≦18M : 2

＞24M : 1

All-case survey conducted from 2023/04 to 2025/03 (N=22)



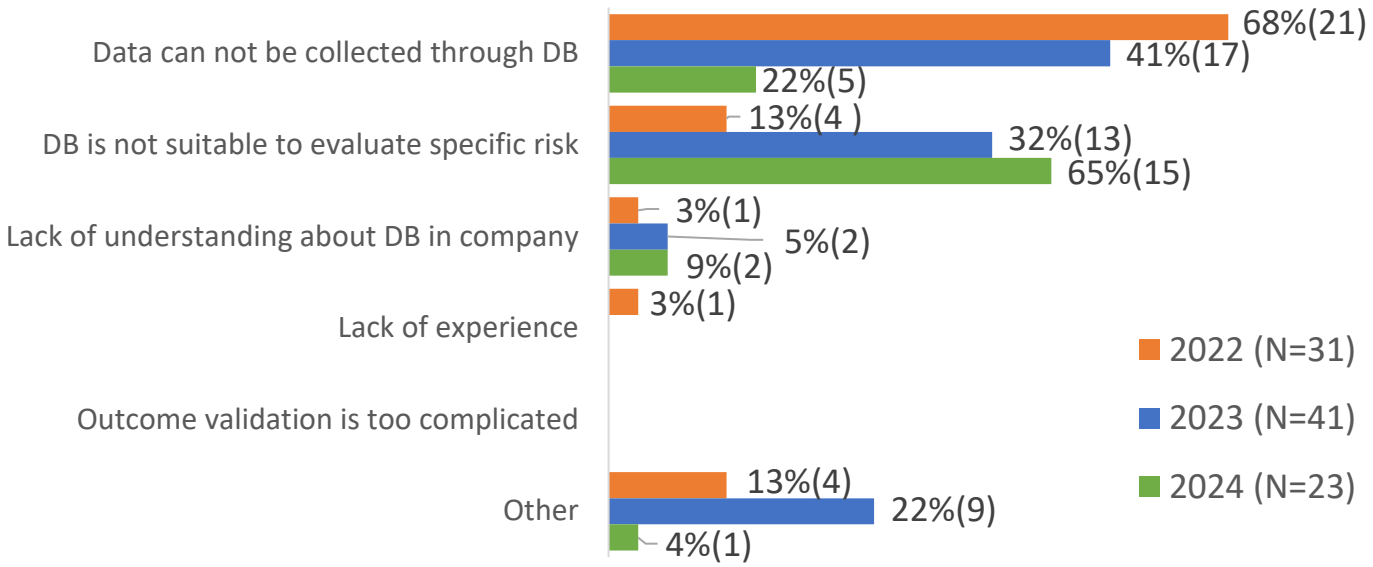
Approval condition or not (n=19)



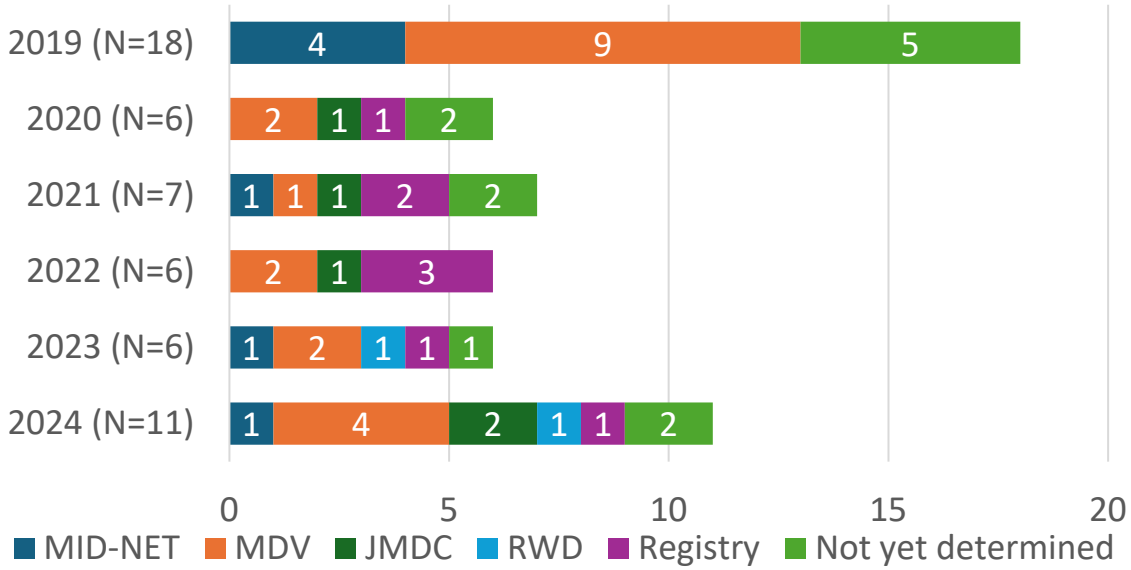
- Three companies experienced the lifting of approval conditions in FY2024.
  It took more than 12 months from consultation to lifting of approval conditions.
- In the past two years, 86% of the companies have conducted the all-case survey.
  Of these, 95% of companies have been granted the approval conditions.

Characterization of database (DB) survey

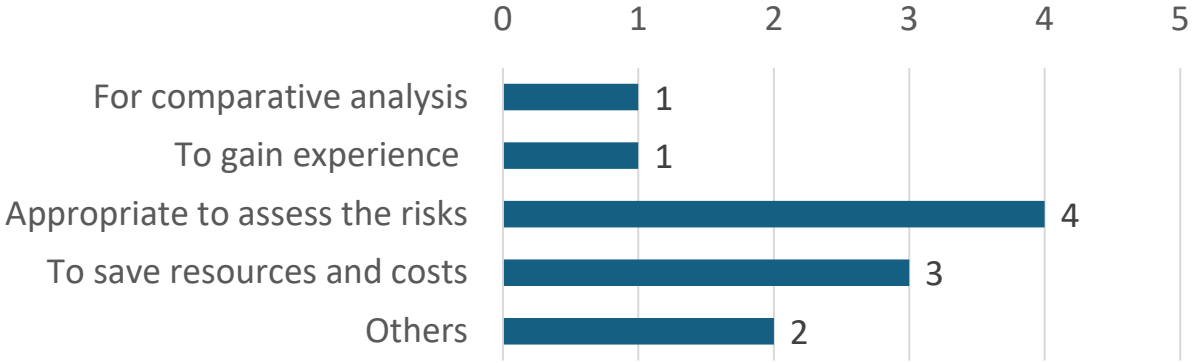
Reason for Database Survey NOT planned



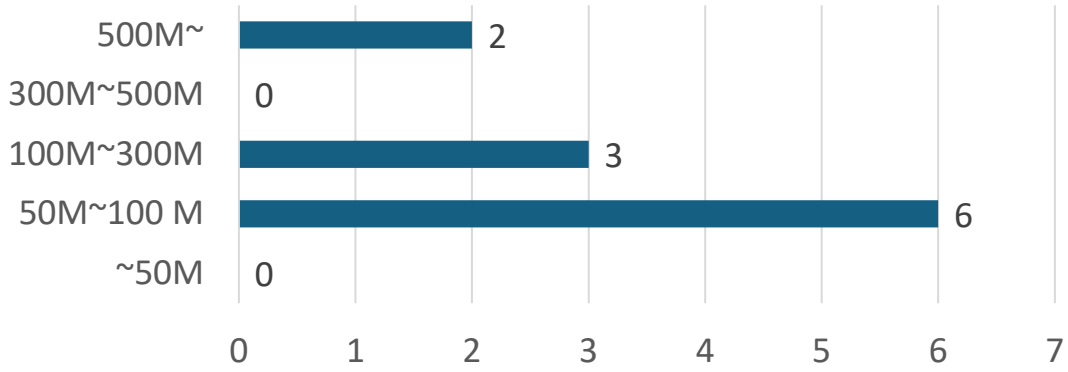
Data source trend



Reason for database planning (N=11)



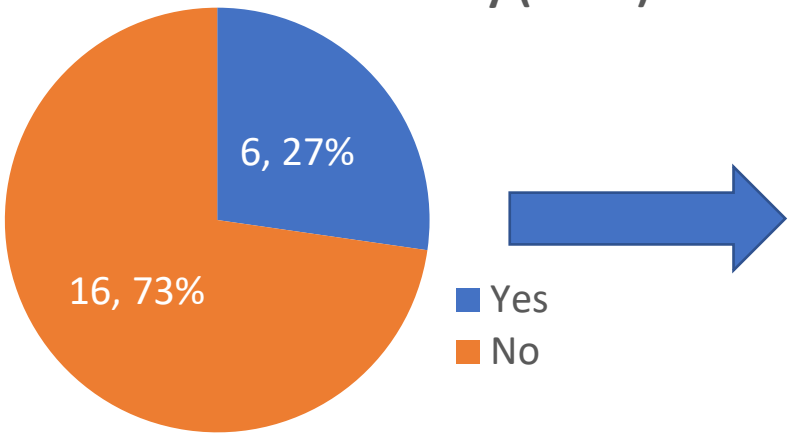
Cost (N=11) unit :Yen



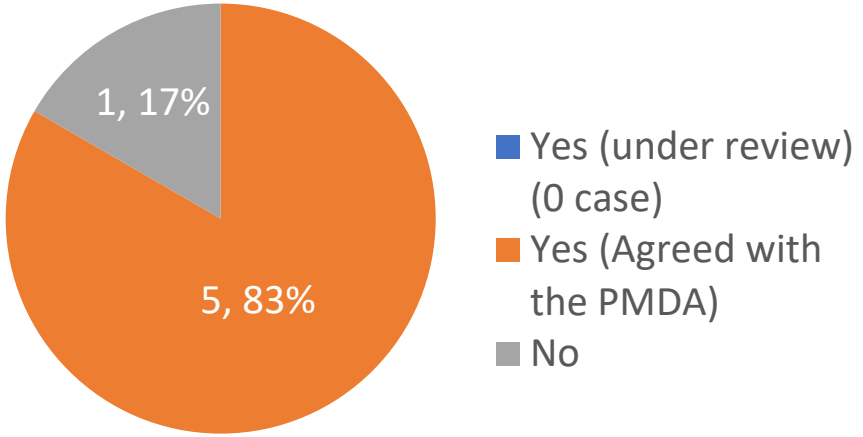
- The number of DB surveys has remained stable in recent years but increased in 2024.
- There were two surveys with budgets exceeding 500 million yen: RWD and Registry.

Database Survey Trend
-Registry, DB survey for safety purposes-

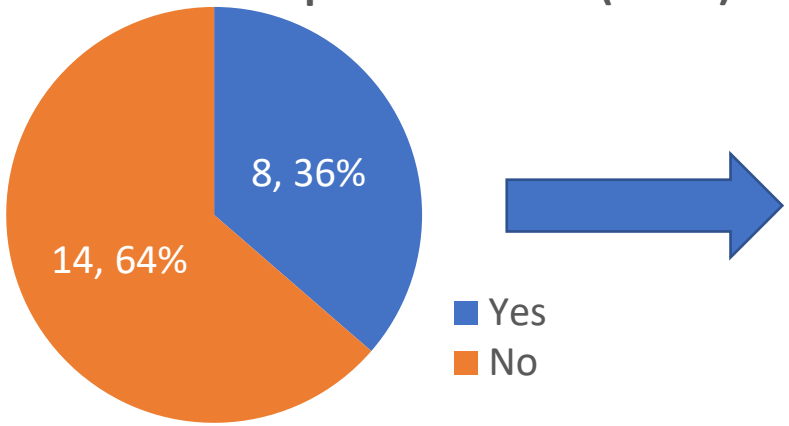
Any products for which the use of registry has been considered as a DB survey (N=22)



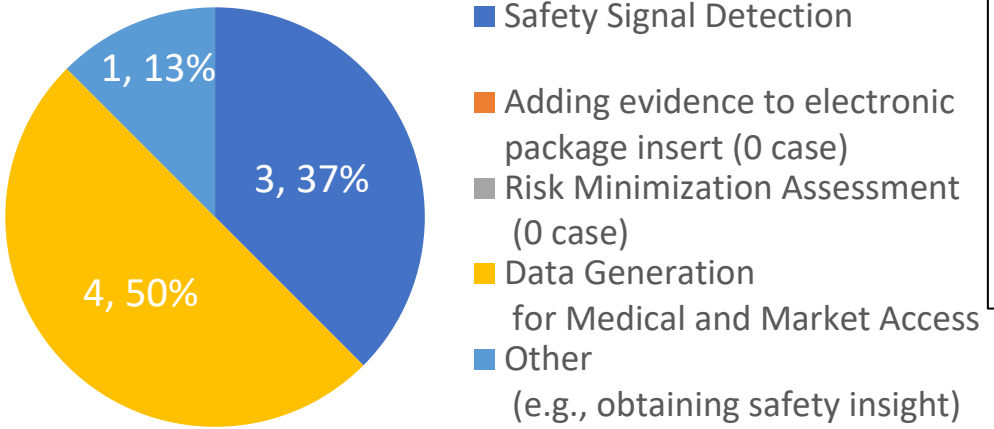
Submit the application for approval using the registry survey (N=6)



Considered/planned DB research outside of GPSP using medical information DB as an example of DB use? (N=22)



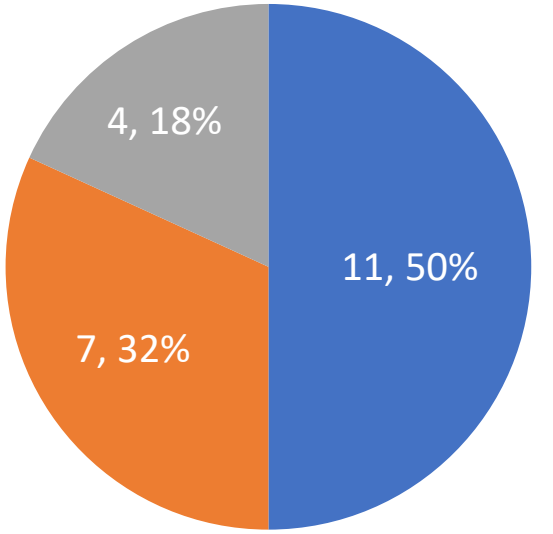
If "Yes" What examples of use cases have you considered? (N=8)



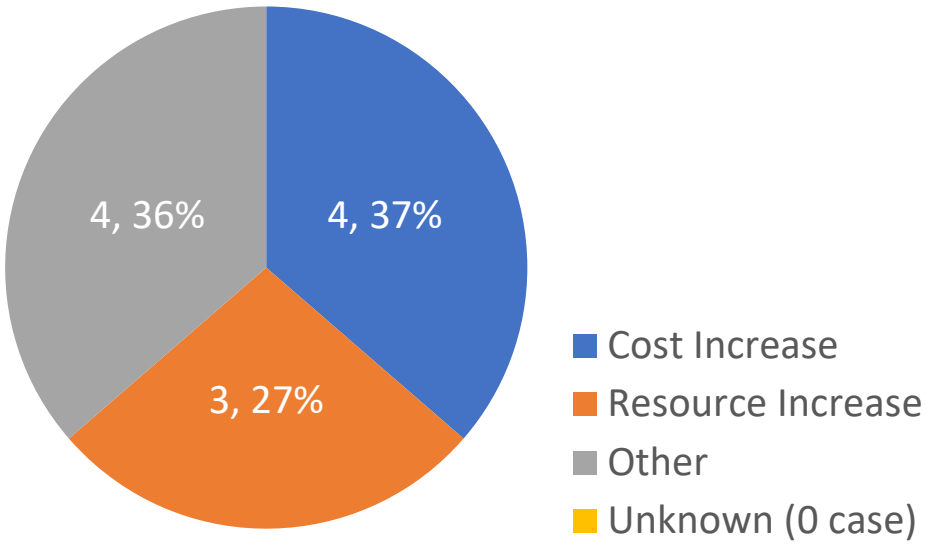
- 27% of companies have considered the utilization of registries.
- 36% of companies have considered or planned a DB study outside of the GPSP using a medical information DB.
  Examples were safety signal detection, Data Generation for Medical and Market Access, and obtaining safety insight.

Database Survey Trend
-Gap-

Any gap with initial assumptions regarding the DB survey (N=22)



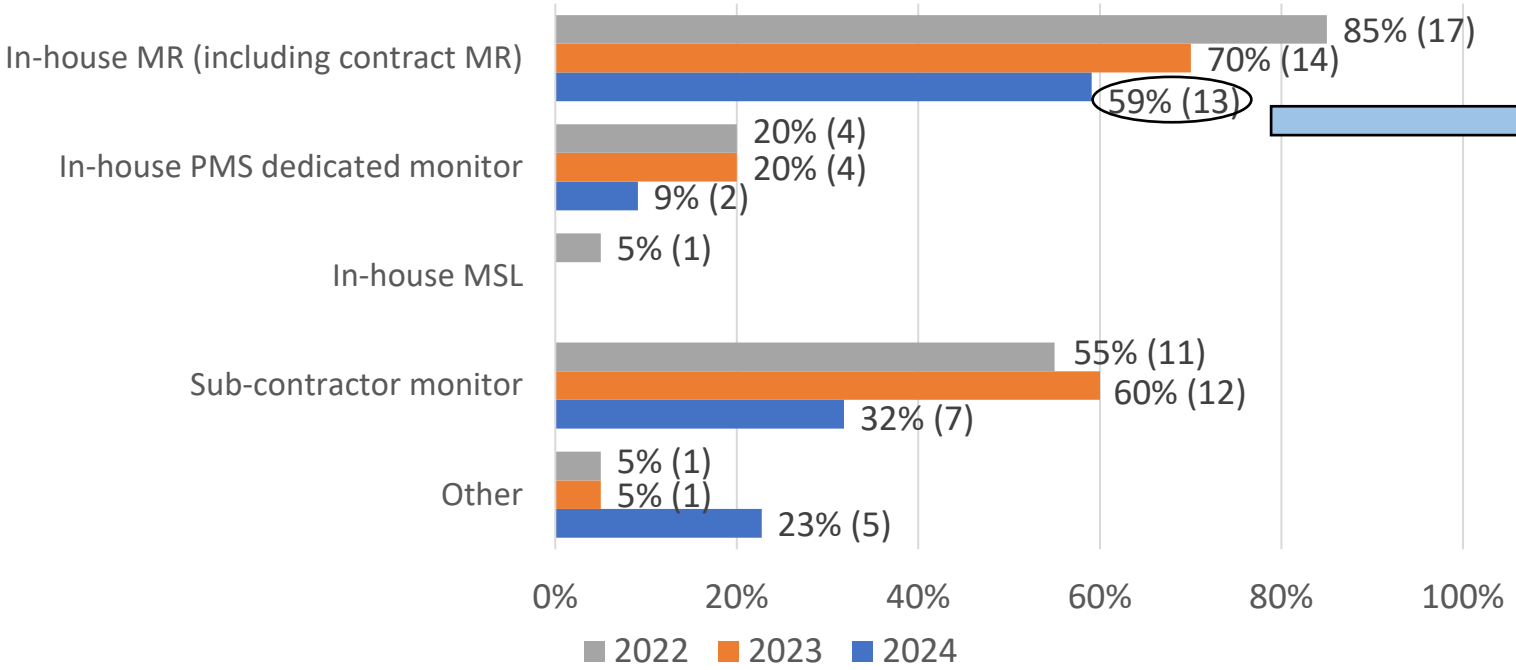
If "Yes", What is the main reason for the gap? (N=11)



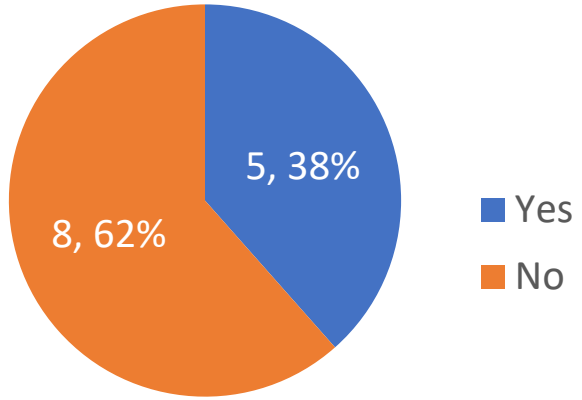
- 50% of companies had gap with initial assumptions regarding the DB survey.
- Main reasons were increase in cost and resources, and others.
  Others included fewer cases than expected, Schedule took longer than expected.

Organization for implementation

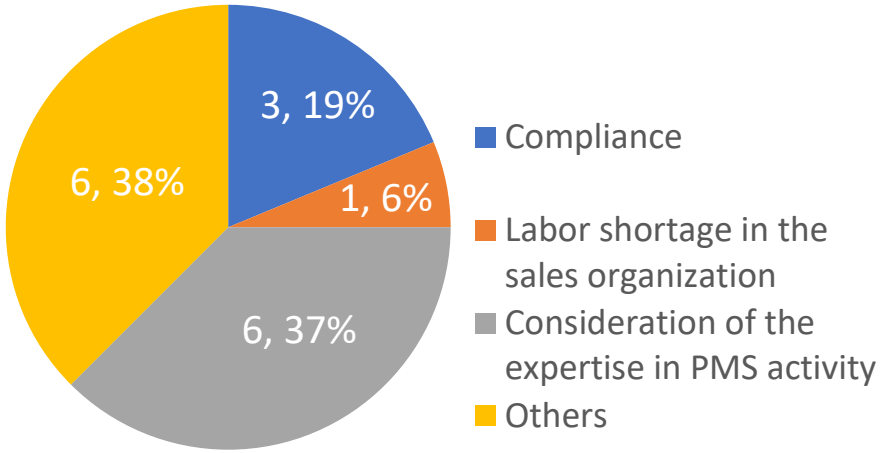
Person in charge of requesting registration and collecting CRF/re-questionnaire (Multiple answers allowed, N=20, 20 and 22 on 2022, 2023 and 2024)



If "In-house MR (including contract MR)" in 2024, the company plans to collect the CRF by a person in charge other than the in-house MR (including contract MR) in future (N=13)



Reason for not "In-house MR (including contract MR)" in 2024 (N=16)

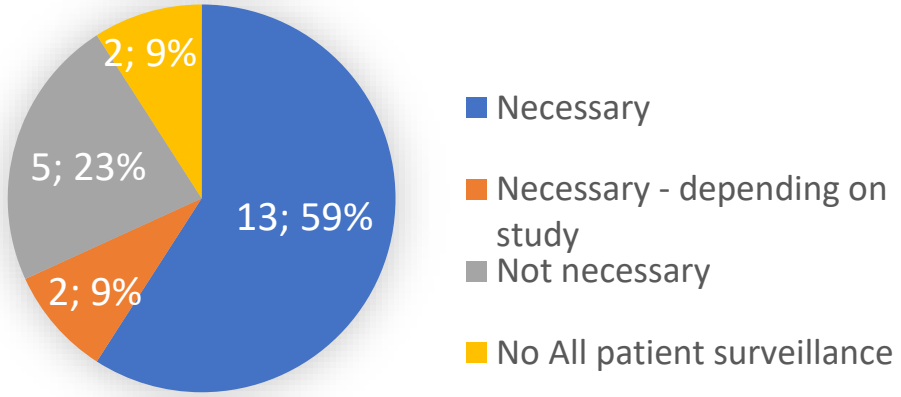


- The proportion of in-house MRs has been declining year by year.
- Currently, just under 40% of companies with in-house MRs are considering shifting to alternatives.
- The main reason for not using in-house MRs is the need for specialized expertise in PMS.

Informed Consent for All case survey

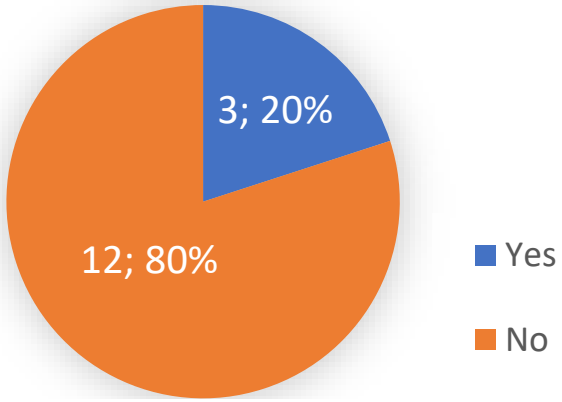
- All case surveillance are being conducted by 20 of 22 companies (91%)
- 15 out of 20 companies (75%) require informed consent from patients

Company policy requires informed consent from patient in all patient surveillance (N=22)



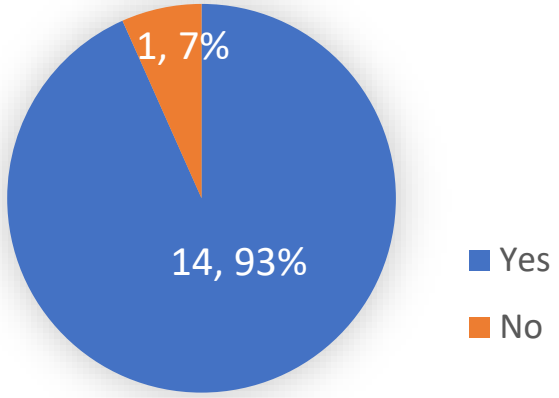
If consent to participate in the survey could not be obtained, all have been "put into the registration criteria and not required to be registered".

Participation in the survey (N=15)



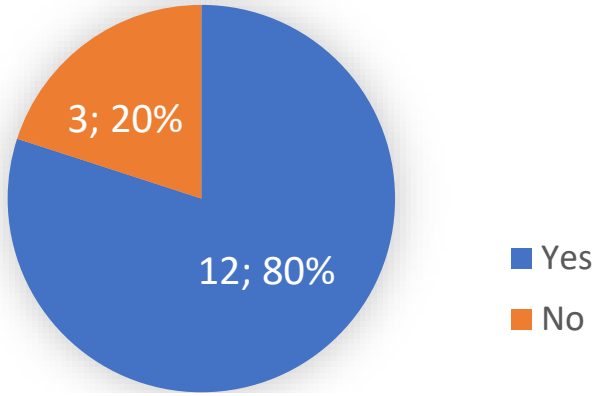
3 out of 15 companies (20%)
require IC for participation in survey

Publication to congress/literature (N=15)



14 out of 15 companies (93%)
require IC for publication to congress/literature

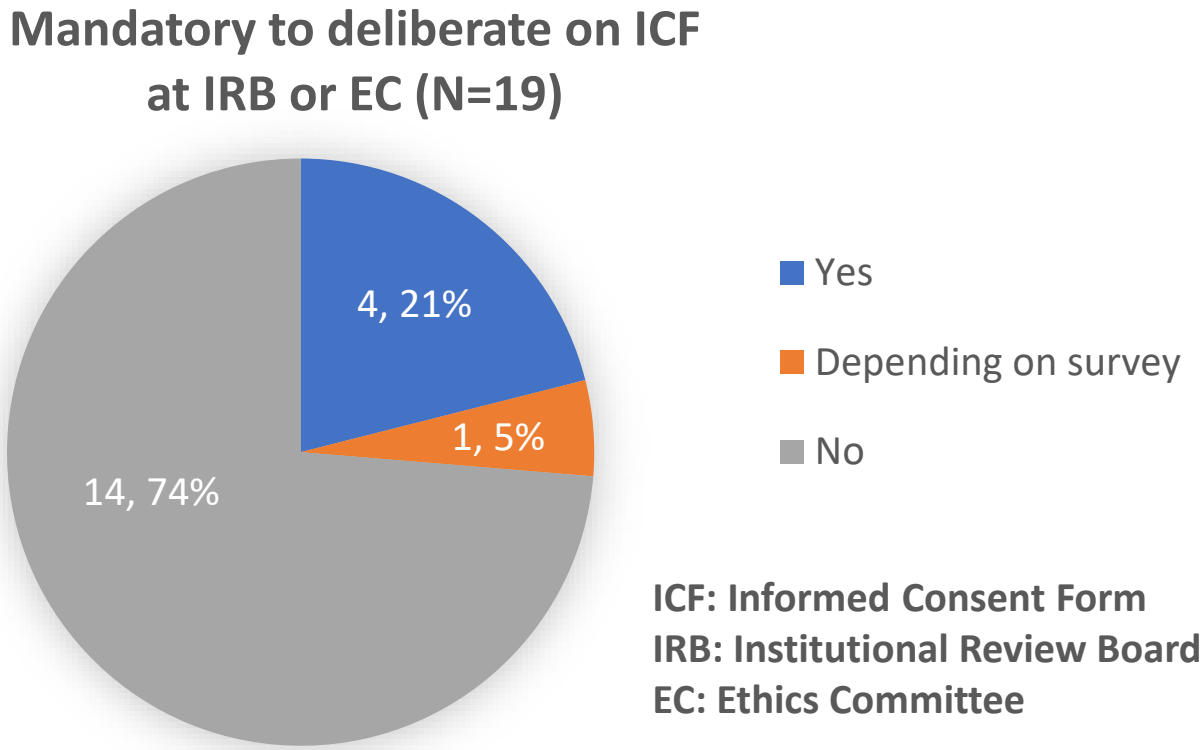
Secondary data use/providing data to 3rd party, overseas etc. (N=15)



12 out of 15 companies (80%)
require IC for secondary data use/providing data to 3rd party, overseas etc.

〈15〉

Deliberation of Informed consent form at IRB/EC



ICF: Informed Consent Form
IRB: Institutional Review Board
EC: Ethics Committee

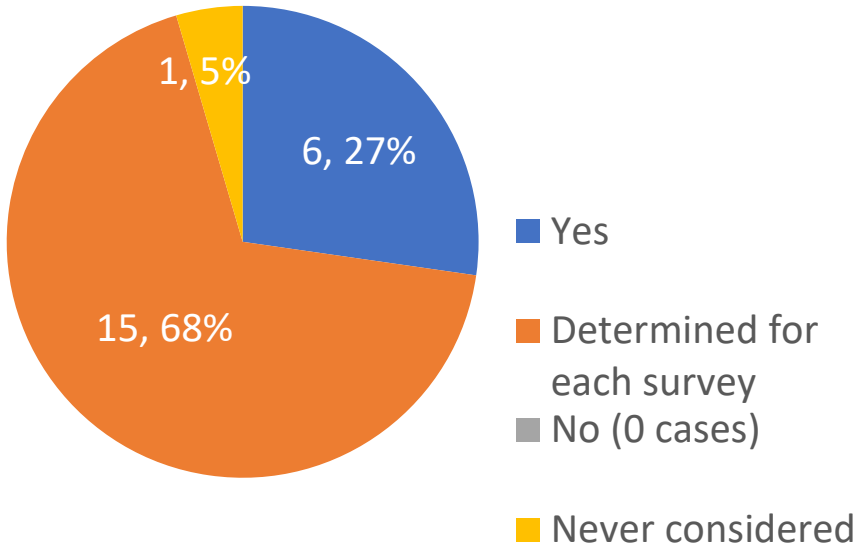
Three of the 22 companies do not require patient consent for regular PMS surveys.

Of 19 companies requiring consent to be obtained from patients

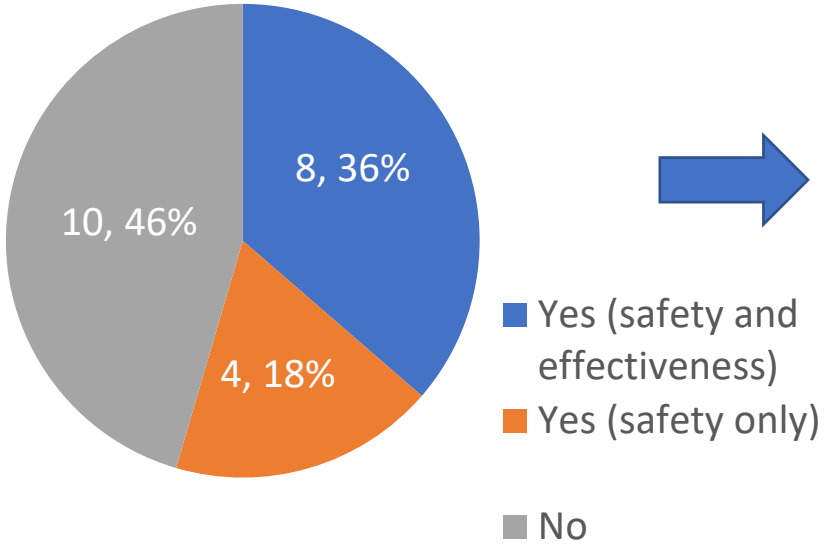
- 5 companies (26%) : ICF discussed by IRB or EC
- 14 companies (74%) : No discussion required

PMS Trend: Disclosure

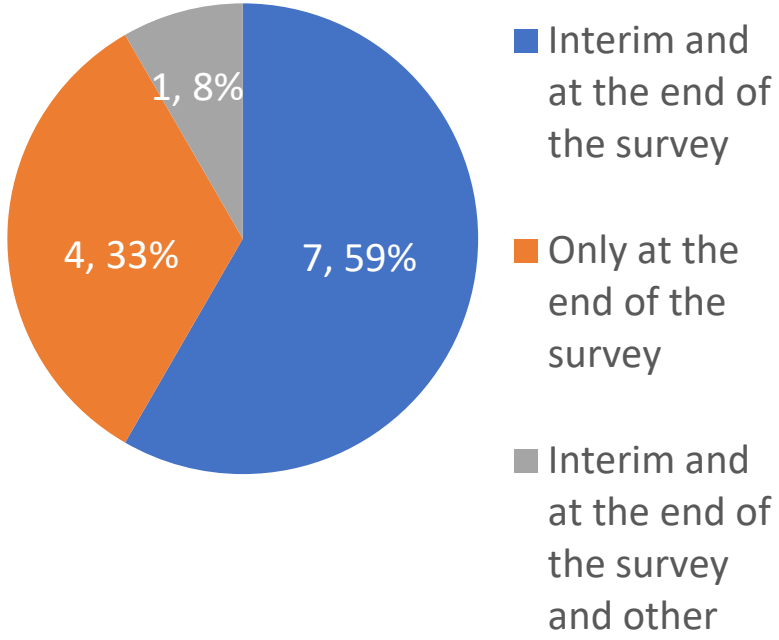
Have you presented PMS results at conferences, papers, etc.? (N=22)



Are the PMS results prepared in paper booklet or PDF (created by the PMS department)? (N=22)



If "Yes", in which timing PMS results distributed? (N=12)



- Many companies published the PMS results at conferences, in papers, etc.
- Regarding the paper booklet and PDF (prepared by the PMS department), 67% of the companies also prepared interim reports. The data were published at an early stage without waiting for the survey to be completed, indicating the effective use of PMS data.