

liver samples. That is, they indicated that Kuehl *et al*<sup>3</sup> might have overestimated the level of CYP3A5 protein, possibly due to problems with the method of quantification. On the other hand, Williams *et al*<sup>19</sup> reported that the Km value of nifedipine was much lower for CYP3A4 than CYP3A5 under the detailed conditions with cytochrome b5. Cytochrome b5 was suggested to be an essential component in CYP3A4-catalyzed nifedipine oxidation in human liver microsomes.<sup>22</sup> Although these data seem to support the present findings *in vivo*, the same was not consistent in the case of

midazolam. Based on all these observations, we speculated that the amount of CYP3A5 protein in the liver is much lower than CYP3A4, although we should consider the limitations of our study design. This speculation might be demonstrated by using CYP3A5-specific substrates, although no drugs metabolized specifically by CYP3A5 have been reported yet. With respect to mRNA expression, it was reported that CYP3A genes exhibit a degree of tissue-specific expression and CYP3A5 is predominantly expressed in the adrenal gland, prostate and kidney.<sup>23</sup> Therefore, CYP3A5 polymorphism might have a physiological and pharmacological effect, which is related to the extrahepatic tissues. This possibility remains to be verified in further studies.

Interindividual differences in nifedipine pharmacokinetics remain to be elucidated genetically. Here, we propose that polymorphic regulation of CYP3A4 gene transcription, including the polymorphisms of the promoter activities and transcriptional factors, may have to be taken into account to explain the variation of nifedipine pharmacokinetics. However, a polymorphism, which plays a significant role in the activity of CYP3A4, has not yet been identified in the 5'-regulatory region of the CYP3A4 gene.<sup>24</sup> Therefore, we have focused on human PXR (hPXR) as a factor effecting CYP3A expression and identified splicing variants of hPXR as a possible factor in interindividual variation caused in CYP3A activity.<sup>25</sup> Interestingly, we have found that mRNA expression of wild-type hPXR is well correlated with mRNA expression of CYP3A4 in liver sample (unpublished data), which is consistent with the recent report.<sup>21</sup>

In summary, we revealed that nifedipine disposition *in vivo* is not affected by the CYP3A5\*3 allele. Owing to a discrepancy between the *in vitro* and *in vivo* contribution of CYP3A5, the functional relevance of CYP3A5 in humans should be re-evaluated by clinical studies for each drug.

#### MATERIALS AND METHODS

##### *In vitro* Screening for the Contributions of CYP3A4 and CYP3A5

Nifedipine and phenytoin were purchased from Wako Pure Chemicals Co. (Osaka, Japan) and oxidized nifedipine (ULTRAFINE) was obtained from Funakoshi (Tokyo, Japan). Microsomes from baculovirus-infected insect cells expressing human CYP3A4 and CYP3A5 with NADPH cytochrome P450 reductase (GENTEST) were obtained from Daiichi Pure Chemicals Co. (Tokyo, Japan). NADPH was purchased from Oriental Yeast Co. (Tokyo, Japan). Other reagents and

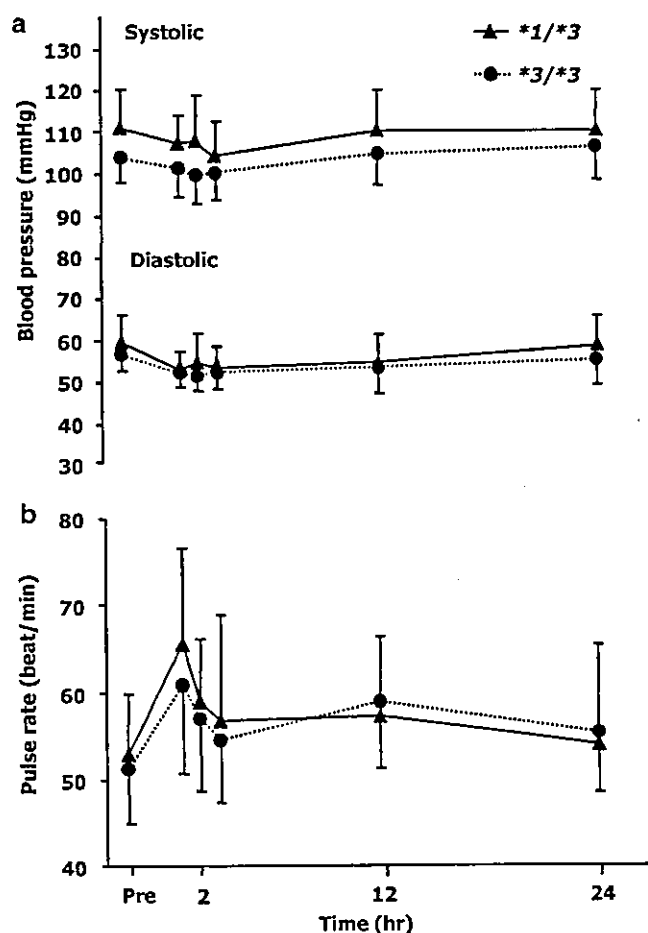


Figure 3 Blood pressure (a) and pulse rate (b) after nifedipine administration. Values represent the means with SD ( $n=8$ ).

Table 4 Systolic and diastolic blood pressures change rate (%) after administration of nifedipine

	1 h after administration of nifedipine		2 h after administration of nifedipine	
	Systolic	Diastolic	Systolic	Diastolic
CYP3A5*1/*3 ( $n=8$ )	3.0 ± 7.2	9.3 ± 10.4	2.7 ± 5.7	6.9 ± 11.3
CYP3A5*3/*3 ( $n=8$ )	2.3 ± 2.8	6.9 ± 5.2	3.8 ± 3.5	8.5 ± 3.7

Values were the mean ± SD of blood pressure changes (%). Each blood pressure change (%) was calculated by the formula ((measured-baseline)/baseline × 100).

organic solvents were obtained from Nakarai Tesq Chemical Industries (Kyoto, Japan).

All incubation, extraction and other handling of samples were carried out in amber vials. A mixture (0.50 ml) containing 10 pmol of P450 protein from baculovirus-expressed human CYP3A4 and CYP3A5 and 1 mM NADPH in 0.1 M potassium phosphate buffer (pH 7.4) was incubated with nifedipine (final concentration: 1, 2, 5, 10 and 40  $\mu$ M) at 37°C after 2 min of preincubation without NADPH. The incubation was continued with gentle shaking at 37°C for 30 min and the reaction was stopped with ethyl acetate (3 ml). A measure of 50  $\mu$ l of methanol and 12.5  $\mu$ l of 20 mM phenytoin (internal standard) were added to each sample. The organic layers were transferred to other vials after centrifugation at 1500g for 10 min and evaporated to dryness. The residues were dissolved in 200  $\mu$ l of the mobile phase. A measure of 50  $\mu$ l were analyzed by high-performance liquid chromatography (HPLC) with a reverse-phase column (Mightysil RP-18 GP250, 4.6  $\times$  250 mm<sup>2</sup>, Kanto Chemical Industries Ltd, Kyoto, Japan). The column temperature was set at 40°C. The mobile phase was composed of 40% acetonitrile (pH 3.0 with perchloric acid) and was delivered at a constant flow rate of 1.2 ml/min. Nifedipine, M-I and phenytoin were detected by a UV detector (Nanospace, SHISEIDO, Tokyo, Japan) with a wavelength at 254 nm. In determining kinetic parameters, nifedipine concentration ranged from all points.

### Subjects

Institutional Review Board approval of the study protocol was obtained. In all, 16 healthy male Japanese volunteers participated in this study (Table 2). The subjects gave written informed consent to participate.

A total of 33 healthy volunteers was screened by the genotyping test to find the eight CYP3A5\*1/\*3 subjects and eight CYP3A5\*3/\*3 subjects. The genotyping test of CYP3A5 was conducted according to the previous study.<sup>6,26</sup> All subjects were healthy as assessed by medical history, physical examination, hematologic tests, blood chemistry and urinalysis, and the results of a positive test for hepatitis B and C, human immunodeficiency virus and syphilis.

Eight CYP3A5\*1/\*3 and eight CYP3A5\*3/\*3 subjects who showed normal results on routine laboratory tests described above and the negative results of virus tests were selected.

### Genotyping Test

Genomic DNA was isolated from peripheral leukocytes using QIAGEN blood kit. The genotypes of each individual at the CYP3A5\*3 and CYP3A5\*6 alleles were determined using PCR-restriction fragment length polymorphism analysis according to the previous report.<sup>6</sup> For the analysis of the CYP3A5\*3 allele, the forward (CYP3A5 6956Fm; 5'-CTT TAA AGA GCT CTT TTG TCT CTC A-3') and reverse (CYP3A5 7155R; 5'-CCA GGA AGC CAG ACT TTG AT-3') primers were used (GenBank accession no. AC005020). For the analysis of the CYP3A5\*6 allele, the forward (CYP3A5 14505F; 5'-GTG GGT TTC TTG CTG CAT GT-3') and reverse (CYP3A5 14741R; 5'-GCC CAC ATA CTT ATT GAG AG-3') primers

were also created based on the published sequence. These PCR reactions were carried out in 25  $\mu$ l of solution consisting of 2.5  $\mu$ l of 10  $\times$  PCR buffer, 0.2 mM of each dNTP, 0.4  $\mu$ M of each primer, 90 ng of genomic DNA as a template and 1 U of AmpliTaq Gold (Perkin-Elmer, Branchburg, NJ, USA). After initial denaturation at 95°C for 10 min, the amplification for the CYP3A5\*3 or \*6 alleles was performed using 37 cycles of 94°C for 30 s, 56°C (\*3) or 58°C (\*6) for 30 s and 72°C for 30 s, followed by 72°C for 5 min for final extension. After PCR amplification, 5  $\mu$ l of each PCR product was digested for a minimum of 2 h at 37°C with 5 U of *DdeI* before electrophoresis using a 3% agarose gel.

CYP3A5\*5 and CYP3A5\*7 alleles were also determined according to the method of van Schaik *et al*<sup>26</sup> with some modifications.

### Study Design

A single oral dose of 10 mg of nifedipine (Adalat® Bayer, Germany) with 200 ml of water was administered to the subjects at 01000 after overnight fasting. Blood samples (7 ml each) were collected before administration and at 0.5, 1, 1.5, 2, 3, 4, 6, 8 and 12 h after administration. During this study, adverse effects were assessed on an ongoing basis as subjects offered information. Blood pressure and pulse rate were measured before administration and at 1, 2, 3, 12 and 24 h after administration. A 12-lead electrocardiogram was recorded before administration and at 2.5 and 24 h after administration. Hematologic tests, blood chemistry and urinalysis were performed before administration and at 24 h after administration.

Grapefruit juice, St John's Wort, alcohol, caffeine-containing beverages, tobacco and exercises were not allowed during the study.

### Assays

Blood samples were collected in heparinized tubes and adequately protected from light and centrifuged to obtain serum. The samples were stored frozen at -20°C until analyzed. Plasma concentrations of nifedipine and M-I were measured by HPLC as described previously with minor modifications.<sup>27-29</sup> Briefly, nifedipine and M-I were extracted with dichloromethane/pentane (3:7, v/v) and separation of the compounds was achieved using an Inertsil ODS-3 column (3 mM particles, 4.0  $\times$  100 mm<sup>2</sup>, GL Sciences Inc., Tokyo, Japan). The compounds were detected at a wavelength of 230 nm using a UV detector (SPD-10Avp, SHIMADZU, Tokyo, Japan).

### Pharmacokinetic Parameters

The peak plasma concentration ( $C_{max}$ ) and the time to reach the  $C_{max}$  ( $T_{max}$ ) were obtained as measured values. The apparent first-order elimination rate constant ( $K$ ) of nifedipine was determined by linear regression analysis of the slope of the terminal phase using the last three or four points on the log plasma drug concentration-time curve. The terminal elimination half-life ( $t_{1/2}$ ) was calculated from the relation  $t_{1/2} = 0.693/K$ . The area under the plasma concentration-time curve from 0 to 12 h after administra-

tion ( $AUC_{0-12h}$ ) was calculated by the linear trapezoidal method. The area under the drug concentration–time curve from time to infinity ( $AUC_{\infty}$ ) was determined by the linear trapezoidal method with extrapolation to infinity. Clearance (CL/F) was calculated as  $dose/(AUC_{\infty})$ . The plasma nifedipine/M-I ratio was calculated from the  $AUC_{0-12h}$  value of nifedipine and M-I.

#### Data Analysis

The pharmacokinetic parameters and the plasma nifedipine/M-I ratios were first analyzed by one-way ANOVA. If the overall F ratio was significant, further comparison of the means was performed with the Student's *t*-test. Statistical analysis of the pharmacodynamic variables of systolic and diastolic blood pressure, and pulse rate made under resting conditions, were performed using ANOVA with repeated measurements. Time was used as a repeated variable. A probability level of  $P < 0.05$  was considered to be statistically significant.

#### ACKNOWLEDGEMENTS

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#### DUALITY OF INTEREST

None declared

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# 1st DIA Annual Japan Workshop for Pharmacogenomics in Tokyo

1st DIA Annual Japan Workshop for Pharmacogenomics,  
September 2–3, 2004, Tokyo, Japan

**Mieko Tamaoki<sup>1\*</sup>, Hiroshi Gushima<sup>2</sup> & Kiichiro Tsutani<sup>3</sup>**

<sup>\*</sup>Author for correspondence

<sup>1</sup>Yamanouchi Pharmaceutical Co. Ltd, Product Evaluation Department, Tokyo, Japan  
Tel.: +81 3 5916 5537; Fax: +81 3 5916 5616; E-mail: tamaoki@yamanouchi.co.jp

<sup>2</sup>Biofrontier Partners, Inc., Tokyo, Japan

<sup>3</sup>The University of Tokyo, Department of Pharmacoeconomics, Graduate School of Pharmaceutical Sciences, Tokyo, Japan

The Drug Information Association (DIA)-sponsored *First Annual Japan Workshop for Pharmacogenomics* (PGx) was held on September 2 and 3, 2004, at Shinjuku in Tokyo, Japan [101]. This was one of the two workshops started in 2004 together with regulatory affairs (Figure 1). This workshop, which was also organized in collaboration with the Council for International Organizations of Medical Sciences (CIOMS), provided a platform to introduce the activities of the CIOMS Working Group on Pharmacogenetics (CIOMS PGt WG), which was established in 2002 [102]. In addition, general trends and the regulatory and ethical aspects of PGx in the USA, Europe, Asia and Japan were reported and discussed. This report summarizes the outline of the workshop and the individual topics that were presented. Although presentations of the findings of basic and clinical research were also reported, this paper refers only to the regulatory, ethical and social dimensions of PGx.

## 1st DIA Annual Japan Workshop for Pharmacogenomics

The Program Committee Chairperson for this first DIA workshop on PGx in Japan was Kiichiro Tsutani, who is a Professor at the Graduate School of Pharmaceutical Science of the University of Tokyo. Other committee members included Junichi Azuma (Professor of Osaka University), who represented

academia at the meeting; Tohru Masui (Senior Researcher of the National Institute of Health Science) and Chie Kojima (Manager of the Pharmaceutical and Medical Devices Agency [PMDA]), who both represented regulatory agencies; and Hiroshi Gushima (Scientific Adviser of Yamanouchi and Biofrontier Partners), six members of the Japan Pharmaceutical Manufacturers Association (JPMA), and Mieko Tamaoki (Yamanouchi), who all represented the pharmaceutical industry. These individuals were responsible for developing the scientific program, selecting the guest speakers, and organizing the workshops.

The meeting was divided into four sessions. In Session 1, which was entitled 'CIOMS Initiatives', six PGx experts from academia, regulatory agencies and industry in the USA, Europe and Japan introduced PGx-related regulatory perspectives and trends in the USA and Europe and the main activities of the CIOMS PGt WG since it was established in 2002.

In Session 2, entitled 'Collaboration between Regulators and Industry', leaders in PGx from US and European industry presented the activities of the Pharmacogenomics Working Group (PWG) and experience with the application of PGx in clinical research [103].

The third session, entitled 'PGx in Asia', centered on the current trends and status of PGx research in the Republic of Korea, Taiwan, and China, where some

areas of PGx research have advanced relatively further than in Japan.

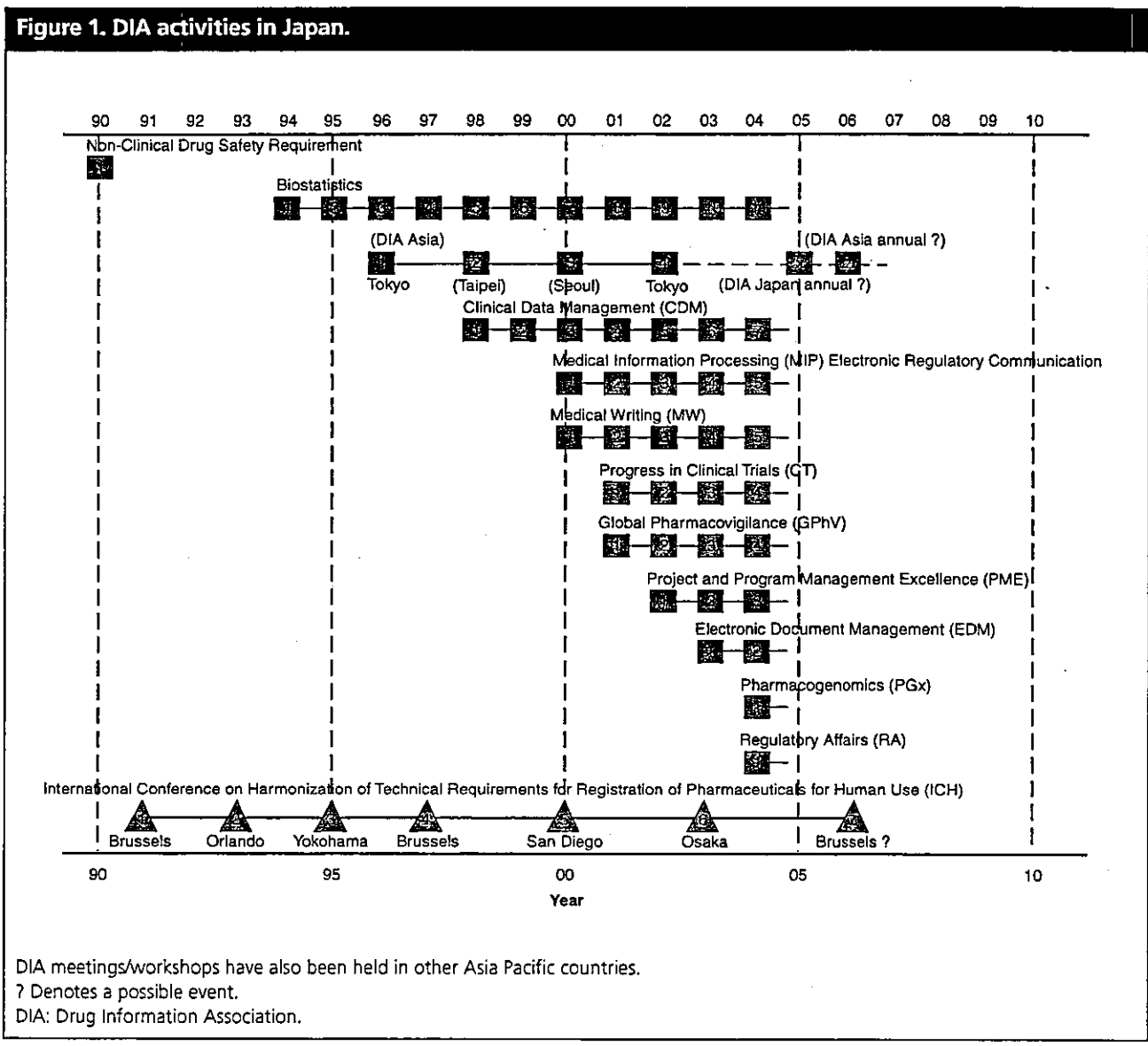
In the final session, entitled 'PGx in Japan', presentations were made by speakers representing academia, regulatory agencies, and industry. First, Azuma introduced cases of PGx-based clinical trials from the perspective of the physician desiring to promote individualized medicine. This was followed by presentations on the activities of the Japan Pharmacogenomics Consortium (JPGC) [104], and activities of the Pharma SNP Consortium (PSC) and other JPMA projects. Furthermore, Yoshiaki Uyama (Principal Reviewer at the PMDA, Japan) discussed regulatory issues concerning PGx in Japan.

In addition to these presentations, the keynote address was delivered by Kiyoshi Kurokawa, the President of the Science Council of Japan. Prior to the workshop, those not familiar with PGx were also given the opportunity to attend tutorials by Ryuichi Kato (Emeritus Professor of Keio University Medical School) and Hirotochi Echizen (Professor of Meiji Pharmaceutical University).

## Session 1

The workshop commenced with a presentation by Juhana E Idänpään-Heikkilä (Secretary General of the CIOMS), who provided an update on the activities of the CIOMS PGt WG.

The CIOMS is an international, non-governmental, non-profit organization established jointly by the World Health Organization (WHO) and the United Nations Educational, Scientific and Cultural Organization (UNESCO) in 1949. Its membership is comprised of both national and international organizations, including the Science Council of Japan. The main objective of this collaboration is to promote international activities in biomedical sciences. It plans and executes long-term programs, which



include: bioethics; the international harmonization of health policies, ethics, and human values; the development and proper use of medicines; and the management of the international nomenclature of diseases. One of the most important activities of the CIOMS is the publication of the *International Ethical Guidelines for Biomedical Research Involving Human Subjects* (the revised guidelines were issued in August 2002) [1]. This document is known as a 'must read' for every person involved in clinical research, and is of equal importance to the Declaration of Helsinki. Although recommendations issued by the CIOMS are not compulsory for

member countries, there are some cases illustrating their influence on regulatory authorities via the *International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use* (ICH) activities, and, thus, certain attention should be paid to these trends.

The CIOMS PGt WG was established to provide opportunities for the examination and evaluation of the influence of PGx on future medical treatment, drug development, regulatory control, society, economy and insurance systems for experts from academia, regulatory agencies, and industry. This is in response to the general perception of PGx as having

potential value and increasing practical application of genome information for the development and proper use of medicines. A new report, entitled '*Pharmacogenetics – towards improving treatment with medicines*', was published in early 2005 [2]. This report consists of 12 chapters and an appendix summarizing the current state of PGx research in Australia, Canada, China, Chinese Taipei, Europe, Japan, the Republic of Korea, and Singapore.

The CIOMS PGt WG held its preparatory meetings in January and September 2001. Thereafter, the group formally started its activities at a London-based conference held in February 2002, followed by a conference in Bonn,

Germany, in August 2002, Washington DC in February 2003, Warsaw in September 2003, and Windsor, UK, in April 2004. In addition to these meetings, the group has exchanged opinions via e-mail and other means of communication and prepared reports. At this conference, the group introduced its reports on PGx and held a workshop as a follow-up meeting held jointly with the DIA in Japan.

The CIOMS PGt WG itself is composed of members from academia, regulatory agencies and industry in Japan, the USA, and Europe: 3 members from academia, 15 from 11 different regulatory agencies, and 14 from 11 private enterprises (including venture companies). The Japanese members include Noboru Takahashi and Chie Kojima of the Japanese Ministry of Health, Labour, and Welfare (MHLW), and Tsutani, Gushima and Tamaoki.

In the session entitled 'CIOMS Initiatives' held in the afternoon on the initial day of the workshop, the activities of the CIOMS were introduced and the following chapters of the *Pharmacogenetics – towards improving treatment with medicines* report were presented: communication and education, ethical issues, abnormal drug response: opportunities for risk reduction through PGt, improvements in existing therapies, and regulatory perspectives in PGt.

The presentation focusing on 'Communication and Education' of PGx was prepared jointly by Tomas R Weihrauch (Bayer) and Tsutani. The latter delivered the speech. Tsutani pointed out that, for all stakeholders, the use of clear, relatively simple and common language is crucial. He added that all communications and educational efforts should enhance the stakeholders' understanding of PGx, which will lay the groundwork for its support, acceptance, and implementation.

David A Lepay (US Food & Drug Administration [FDA]) delivered a presentation entitled 'PGx, Ethics, and Clinical Trials: a Regulator's Perspective', in which he commented on the desired rules of ethics and the conduct of clinical trials from a regulatory point of view. His conclusions, based on the FDA's

perspective, were that PGx data should be viewed as a part of medical data and no separate regulations are necessary. He did indicate that the current Good Clinical Practice (GCP) principles concerning informed consent (IC), as well as the institutional review board (IRB), are all applicable to PGx trials. Lepay stressed that the important point to note was that IC is the process by which a candidate patient exchanges study-related information with the investigator and other study personnel, and the patient must not only be asked to sign the form but also be fully informed of the study through the exchange of information. Lepay emphasized that a uniform procedure for obtaining IC cannot be applied to all clinical trials.

Rashmi R Shah (Medicines & Healthcare Products Regulatory Agency [MHRA], UK) spoke of the promise of using PGx approaches to ensure and improve drug safety. Shah cited cases where the dose on the labeling had been changed for 73 (21%) of 354 drugs approved by the FDA during 1980–1999 [3]. He also stated that the dose had been reduced to ensure safety for 58 (79%) of those drugs. When the dose approved by the agency was compared with the therapeutic dose reported in the literature for 48 drugs, almost all were found to be efficacious at doses lower than the approved dose [4]. The identification of the optimal dose still remains a critical issue, irrespective of the use of PGx approaches. The optimal dose should be established based not on the maximum tolerated dose, but on other careful considerations. The manifestation of therapeutic effects, adverse drug reactions (ADRs) and drug interactions is often dependent on genotypes, but clinical problems do not always involve genes. Shah commented that when judged to be clinically useful, genotyping approaches should be employed in identifying target patients or finding the optimal dose for individual patients.

Lembit Rågo (WHO) gave a presentation entitled 'Improving Existing Therapies'. Rågo stated that PGx is expected to be useful in:

- promoting the rational use of drugs
- extending therapeutic indications of

approved drugs

- re-evaluating drugs withdrawn from the market or terminated during research
- omitting trial and error in prescribing drugs or abolishing fixed prescriptions
- reducing the overall cost to society

He also pointed out that there are many remaining issues that need to be resolved, including the need to encourage investment in the research of older, previously approved drugs and the time-consuming approach used for obtaining public consensus on gene analysis, as well as the involvement of other non-genetic factors, such as environmental contributory factors and ethical problems. Nonetheless, Rågo considers the use of PGx studies valuable for re-evaluating current drug therapy by providing a basis for revising labeling, updating treatment guidelines, and recording PGx data as patient medical information. These approaches should be useful in substantially reducing medical expenses and improving medical quality.

The presentation on PGx-related regulatory perspectives was jointly prepared by Marisa Papaluca Amati (European Medicines Agency [EMA]) and Lawrence J Lesko (FDA). Amati addressed the workshop attendees, and pointed out the following findings and issues surrounding healthcare and medicine:

- the existence of a dropout rate of more than 80% for new investigational drugs during the clinical stage due to safety or efficacy concerns
- the insufficient number of new drug products launched onto the market
- the possibility that pharmaceutical company product pipelines are being depleted
- changes in labeling within 2 years after license approval
- withdrawal of blockbuster products from the market each year due to serious ADRs
- lawsuits or other issues facing the industry
- a strong need for new drugs in clinical practice

According to Amati, both the EMA and the FDA believe that PGx may be

useful in improving such situations. However, since there are ethical as well as scientific and technological issues that must be resolved before PGx research can be put into practice, the agencies are currently trying to participate in PGx workshops and to join in the international activities of CIOMS, OECD and other organizations in order to maintain unofficial dialog with industry and provide non-binding proposals to the parties concerned.

Regulatory recommendations currently available include the Committee for Proprietary Medicinal Products (CPMP) Position Paper on Terminology in PGt (November 2002), the CPMP Concept Paper on Pharmacogenetics 'Briefing Meetings' (January 2003), and the FDA Guidance for Industry and Pharmacogenomic Data Submissions (November 2003) [105-107]. At the time of writing, regulatory advisory documents that are expected to be issued include the Biobanks and Specific Issues Relevant to Pharmacogenetics (December 2004), Pharmacokinetic Studies and Pharmacogenetics (1st quarter, 2005), Explanatory Note on Briefing Meetings (Including Formats for Pharmacogenetics Submissions; December 2004), and FDA Drug/Test Development Guidance (December 2004).

In conclusion, Amati added that the agencies are willing to promote the utility of genomic data for the improvement of medical therapy through dialog with any persons or parties concerned.

## Session 2

Iman Barilero (Johnson & Johnson) gave a presentation entitled 'Experiences from the PWG'. The PWG, which is a voluntary body made up of 22 companies, including Eisai Co. Ltd from Japan, has discussed and evaluated the following PGx-related issues for further action: terminology, IC, and disclosure of genetic information. The group has already published reports of its conclusions concerning terminology and IC, and has submitted a report discussing the disclosure of genetic information [5-7]. Barilero mentioned that regulatory agencies are taking positive actions for applying PGx

technology to new drug research and the industry welcomes and supports the agencies in preparing and issuing PGx guidances. The industry, added Barilero, would also support international cooperation among agencies.

Lara Hashimoto (Roche) discussed the issues surrounding the use of PGx in clinical trials. Roche established the Roche Sample Repository (RSR) in 1998 and is collecting blood samples from around the world [108]. The company has announced that it has obtained approval for sample collection from more than 1000 ethical committees in 37 countries. The purpose of this sample collection is for exploratory PGx research, and the research aims are limited to research on drug therapy and diseases related to approved indications. The samples and clinical information to be obtained are anonymized to guarantee confidentiality and stored for a maximum of 15 years. The sampling procedures, genotyping laboratories and storage facilities conform to GCP standards. Major hurdles for sample collection are the dynamics of rapidly changing genetic information, regulatory controls over biological sample banking, the ethical environment, and the processes for obtaining IC from study subjects.

The IRB protocol approval rate greatly varies among countries according to government policy and the national sentiment regarding PGx. When the 2003-2004 approval figures were compared with 2000, the rate had drastically fallen in Denmark, Norway, Italy, Portugal, Spain, and the UK, but, in contrast, the rate rose from 0 to 100% in France. No approval rating has been recorded yet in Sweden or Finland. Roche worries that negative feelings or attitudes toward PGx may prevail among investigators in Sweden and Finland if such a situation continues. Looking at the situation in Asia, Roche has not yet tried to collect samples in Japan because it is certain that IRBs would reject such an application. The samples from China, with the exception of the Hong Kong Special Administrative Region, have not yet been shipped abroad because their exportation requires approval from the Ministry. In

Taiwan, the IRBs generally grant approval but the government disapproves of the sampling. Thus, Roche has been limited in collecting clinical samples in Asian countries.

Roche also reported that it was conducting surveys of public opinion concerning expressions used in the IC document from 50 people each in the UK, Japan, and the USA. The company intends to revise its IC document based on the survey results. To date, the survey has been completed in the UK, is close to completion in Japan, and is ongoing in the USA. In the UK, Roche received many questions concerning the publication of study results and the protection of confidentiality, whereas in Japan, many people misinterpreted clauses concerning withdrawal from the study and the sample preservation period. Generally, the Japanese asked more questions and were more critical of PGx studies than UK individuals.

In response to these survey results, Roche said that it would rewrite clauses in the Japanese IC document using clearer and more concise language, be more careful concerning cultural differences in language nuances, prepare a training CD-ROM and kits for guiding investigators and coordinators, and take other appropriate actions.

A recent news article reported that GlaxoSmithKline have started collecting and preserving DNA samples in some of its Japanese clinical trials that were held in 2003 [8]. Thus, it is apparent that trends toward such PGx-related activities are underway, even in Japan.

## Session 3

During this session, speakers from the Republic of Korea, Taiwan and China reported on the status of PGx research in their respective countries/areas, stating that progress is underway for the establishment and improvement of a PGx research base, the conduct of PGx research, and the clinical application of PGx with the aid of strong government support. They added that there have been certain achievements in these areas already.

Sang-Goo Shin (Seoul National University, Republic of Korea) reported that

the Korean Ministry of Health and Welfare strongly supports the Korean PGx Research Network (KPRN) Program, which is led by Shin. He added that the Ministry of Science Technology has established a PGx Center at Inje University. The KPRN is an academia-led organization of approximately 300 members and has conducted many activities to promote PGx.

Herng-Der Chern (Center for Drug Evaluation, Taipei, Taiwan) reported that the Super Control Genomic Database has been established in Taiwan and that 3312 clinical samples have already been collected from normal Han Chinese subjects. Taiwan plans to start a pilot study to establish a disease-oriented genomic database by 2005. Chern introduced a case study example of PGx research that identified SNPs related to Stevens-Johnson syndrome caused by carbamazepine (9). He also discussed the achievements of a venture company that succeeded in identifying 10 SNPs in eight genes involved with the elicitation of the efficacy of interferon in the treatment of chronic hepatitis C, and was looking for practical applications of this knowledge.

Hong-Hao Zhou (PGt Research Institute, Central South University, China) reported the establishment of the PGt Research Institute in Changsha, the Human Genome Project Centers in Shanghai and Beijing (109,110), and the Demonstrative Laboratory for PGt and PGx in Changsha. Zhou also reported that the following projects and research are currently being conducted in China: the International HapMap Project, Chinese PGx Research, the Project on the Relationship of Genomics and Severe Diseases, the Bioinformatics of Gene Functions and Drug Designing, the Demonstrative Laboratory of PGt, PGx and the Modernization of Chinese Herbs, the Research Center for Medication in Minorities, and the Individualization of Drug Therapy for Patients with Hypertension.

#### Session 4

Pharmaceutical companies in Japan organized consortia for the establishment of a PGx research base, and some

of the activities of the organization were introduced at this workshop. Kenichi Imagawa (Otsuka, and Vice Chair of the JPGC) introduced the activities of the JPGC. The JPGC is an organization that was created in July 2003 by the 10 biotechnology and pharmaceutical companies mainly based in the Osaka area. The organization was formed to establish and promote a base for initiating PGx-based clinical trials and to standardize the procedures necessary for the conduct of trials in Japan. Currently, the JPGC is performing clinical research to investigate the relationship between platelet response to aspirin and genetic differences among patients. The JPGC is scheduled to continue research activities until May 2005 and intends to establish the PGx Clinical Trial Support Center.

Kozo Watanabe (Otsuka, and the Head of the PGx Promotion Working Group of the JPMA) introduced four projects that have been proven to work and which the JPMA considers necessary for preparing for the era of genome-based drug discovery. These projects are the PSC Project, the Pharmaceutical Consortium for Protein Structure Analysis (PCProt) (111), the Toxicogenomics Project (112), and the Proteome Factory Consortium Project. Watanabe also touched upon other activities that require efforts by the JPMA to promote PGx research. Based on the importance of a prompt establishment of a PGx research base, well-balanced ethics and science, and the collaboration of academia, regulatory agencies, and industry, Watanabe proposed the following measures to facilitate the initiation of PGx clinical trials:

- the preparation of ethical guidelines for conducting PGx clinical trials
- the development of a PGx research-promoting environment (including the establishment of a PGx research promotion center)
- the clarification of regulatory views on the acceptability of exploratory PGx data for drug evaluation in license applications
- an appeal to the regulatory agencies about the need to establish consultation systems

Yoshiaki Uyama (Principal Reviewer at the PMDA) mentioned regulatory perspectives on PGx in his presentation entitled 'How to Use PGx for Drug Development: Designs of Clinical Studies Using PGx, Issues for Conducting PGx Studies in Japan, Establishment of Guidance for Appropriate Pharmacogenomic Approach in Clinical Trials and Review in Japan'. Uyama commented that the application of the enrichment approach to clinical trials using genetically selected responders may reduce the size of the study population necessary for clinical trials and increase the power of detection. However, data obtained in this manner are specific to selected patients, making overall drug evaluation difficult. Furthermore, patients to be employed in this approach are not representative of actual patients in a clinical setting. As long as there are such patients, the approval of a drug based on the enrichment approach may possibly lead to a undesirable off-label use of such a compound. Uyama also mentioned that in order for PGx data to be used in the license application, the data must be obtained using validated methodology, verified by prospective studies, and evaluated for the risks and benefits in patient groups other than selected responders. He further commented that it is important for PGx to be accepted by the public; that care be taken in safeguarding the patient's privacy; that ethical reviews and coding procedures be handled carefully; that participants be provided with sufficient study-related information with adequate time for consideration; and that there is greater education of the public. Moreover, from an economical point of view, the cost of genotyping should be compared with potential clinical benefits. It will be necessary to harmonize PGx approaches internationally in the future, and ICH would be an appropriate place to start discussions in this regard. Uyama closed his speech by commenting that the appropriate application of PGx to new drug development will only become possible when the MHLW, the PMDA, industry, academia and patients begin to closely cooperate and exchange opinions.



### Highlights

- A new report entitled '*Pharmacogenetics – towards improving treatment with medicines*' was issued by the Council for International Organizations of Medical Sciences (CIOMS), providing a platform upon which to introduce the activities of the CIOMS Working Group on Pharmacogenetics in early 2005.
- The US Food & Drug Administration's perspectives are that pharmacogenomic (PGx) data should be viewed as a part of medical data and separate regulations are unnecessary. They also feel that the current Good Clinical Practice principles concerning informed consent and the institutional review board are applicable to PGx trials.
- The basic principle of the regulatory agencies is to promote the utility of genomic data for the improvement of medical therapy through dialog with persons or parties concerned, although the stage of policy formation and its adoption varies among countries.
- The industry welcomes and supports the regulatory agencies in preparing and issuing PGx guidances, and would also support international cooperation among agencies.
- The necessity and importance of international harmonization were pointed out by many speakers in this workshop.
- In the Republic of Korea, Taiwan, and China, progress is underway for the establishment and improvement of a PGx research base, conduct of PGx research, clinical application of PGx, and development of a network under strong government support. There have been achievements in these areas already.
- Pharmaceutical companies in Japan have organized consortia for the establishment of a PGx research base.
- The industry has such a strong interest in PGx that the environment will be ripe for accepting PGx-based clinical trials in Japan.

### Expert opinion

In 2001, the Ministry of Education, Culture, Sports, Science, and Technology, MHLW and Ministry of Economy, Trade and Industry jointly issued the *Ethics Guidelines for Human Genome/Gene Analysis Research in Japan* [113]. It states that clinical trials conducted in accordance with the Pharmaceutical Affairs Law are not subject to these guidelines. Furthermore, GCP guidelines do not contain any clauses concerning PGx studies. This has led to confusion and an extra burden on the clinical staff for the realization and execution of trials. In contrast to the speed and scale of trials undertaken by foreign pharmaceutical companies, as demonstrated in this workshop, Japanese companies have been reluctant to proceed with PGx trials, with some exceptions. Their reluctance stems from a fear of heavy burden and high risks because of the uncertainty of public acceptance concerning genotyping and genetic data handling, as well as the absence of regulatory guidance on the acceptability of PGx data for approval review, despite it being clear that PGx studies are beneficial for patients in most cases. There were, however, nearly 150 people attending this workshop, and the attendees represented almost all of the research-oriented drug manufacturers and other companies actually working in PGx-related fields based in Japan, evidencing that the industry has a strong interest in PGx.

In early June 2004, in view of the slow progress of PGx research, the MHLW issued the draft notification '*Submitting Clinical Trials Information in which Pharmacogenomic Approaches Were Used by the Regulatory Agency for Making a Guidance Document for Pharmacogenomic Approaches on Pharmaceutical Developments*', and collected public comments on the issue [114]. This notification was aimed at gathering information for the preparation of guidelines for PGx-based studies to facilitate the adequate conduct of clinical and other trials for the development of drugs that are to be prescribed using PGx tests. In response to the issue of the notification, the JPMA commented that it would welcome the issue of new guidelines since the clarification of standards concerning clinical trials would have significant merits for the industry in assisting various decision-making processes and removing complexities arising from ambiguities in judgment criteria. Additionally, the JPMA submitted a total of 18 items of requests or comments concerning the schedule for issuing the guidelines, harmonization with other regions, and the methodology of information supply. The Ministry announced that it received dozens of public comments. The guideline is to be finalized within 2004.

In Japan, discussion of the policies concerning privacy protection has been continued by relevant ministries in

accordance with the enforcement of the Privacy Protection Act, which is expected to be enacted in April 2005. In the field of medicine, discussion was centered on the protection of a patient's privacy at medical institutions and the protection of the privacy of study subjects who participate in clinical studies. Consequently, the *Ethics Guidelines for Human Genome/Gene Analysis Research* was revised. It was also reviewed in response to the current progress in genetic research, as indicated by the increasing amount of research that requires the linkage of clinical information with genomic and gene analysis information.

In view of such regulatory trends, it is expected that PGx-based clinical trials will become accepted in Japan.

### Outlook

The realization of PGx-based research may require different approaches, such as research on new drugs, drugs already marketed, therapeutic efficacy, and ADRs. Although it may be difficult to proceed uniformly with all these areas, at least academia, regulatory agencies and industry have agreed with the idea that PGx should be utilized for improving healthcare. It is expected that further discussion will be conducted regarding the regulatory, ethical, scientific and technological issues.

The necessity and importance of international harmonization were pointed out by many speakers in this

workshop. The discussion between people of various positions from different countries that was enabled at this gathering is considered to be valuable and meaningful for the formation of a common global concept.

This DIA workshop on PGx in collaboration with the CIOMS was able to be held for the first time in Asia, and in Japan, in particular, through the

cooperation between academia, regulatory agencies and industry. However, in the USA and Europe, similar PGx workshops have been held several times already, and discussions and the exchange of opinions has occurred between academia, regulatory agencies and industry on many occasions. In particular, the FDA generally holds such workshops before and after issu-

ing new guidances in order to gather public opinion. There are high expectations that this sort of forum will continue to play an important role in facilitating the exchange of opinions among academia, regulatory agencies, and industry, as well as in policy formation by agencies based in Asia, and in Japan, in particular, similar to those that occur in the USA and Europe.

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# 医薬品開発におけるファーマコゲノミクスの役割

## ——米国FDAファーマコゲノミクス・ドラフトガイダンスを中心に

渡辺 耕三, 玉起美恵子, 了戒 純一

WATANABE Kozo, TAMAOKI Mieko and RYOKAI Junichi

日本製薬工業協会・研究開発委員会

### はじめに

米国食品医薬品局（以下、FDA）は、“ファーマコゲノミクスデータ提出”に関するドラフトガイダンス<sup>1)</sup>を2003年11月3日に公開し、ファーマコゲノミクス（以下、PGx）研究の医薬品開発への適用についての明確な方針や道筋を示した。

FDAはここに至るまでに、企業などと意見交換を重ねており、2002年5月にはIND（Investigational New Drug：新薬治験許可申請）資料に関してPGxデータの提出を促進するために“Safe Harbor”の概念を提唱し、これらのPGxデータを規制には使用しないことを示して企業のPGx研究を推進しようとした。

また、FDAはこのドラフトガイダンスの公開に先立ち、2003年4月には“遺伝性のDNAマーカー、変異および発現パターンについてのMultiplex試験；企業およびFDA審査官のためのドラフトガイダンス”<sup>2)</sup>を公開しており、2004年中にドラフトの公開が予定されている“臨床研究と体外診断薬”に関する2つのガイダンスとあわせた4つのガイダンスで企業の本格的なPGxデータ提出に向けて準備を整えようとしている。

そこで本稿では、“ファーマコゲノミクスデータ提出”に関するドラフトガイダンスを解説し、医薬品開発におけるPGxの役割についてドラフト

ガイダンス記載の応用例を参考にして概説する。

### ファーマコゲノミクス・ドラフトガイダンス公開の目的

今回のドラフトガイダンス公開の目的は、PGx分野の科学的な発展と医薬品の開発にPGxデータの使用を促すことである。その背景には、PGxデータは薬剤応答性（有効性および副作用）の個人差を確認できる情報源としての潜在的能力があり、個々人にあった治療、すなわち、最大の有効性と最小のリスクを求めるテーラーメイド医療に役立つものとFDAは期待している。にもかかわらず、新薬の承認審査過程でFDAがPGxデータをどのように取り扱うかが示されていないために、企業は医薬品開発の段階でPGx試験に乗り出すことに躊躇していることがある。そこで、FDAはこのガイダンスを出すことで、許認可決定におけるPGxデータ取り扱いの基本方針を明らかにし、企業がPGx試験に安心して取り組めるような環境整備を図りたいと考えていると推測される。

この方針に基づき、FDAは“任意PGxデータ提出”（VGDS；Voluntary Genomic Data Submission）、すなわち「企業が試験デザインなどの意思決定や科学的な論証にPGxデータを使用したいとき、薬剤ラベルや承認申請資料の科学的根拠に使

用するとき、あるいは試験結果が既知で根拠が確実なバイオマーカーもしくは根拠が確実と思われるバイオマーカー\*になるときにはINDやNDA (New Drug Application: 新薬承認申請) 時のPGxデータの提出を必須とするが、それ以外のときに

はPGxデータのINDやNDA時の提出は必須とせず、任意提出を推奨する」という“Safe Harbor”の概念を引き継ぐ新しいシステムを提案している(表1)。

VGDSにはもう一つの目的がある。それは、

表1 PGxデータの提出が必須の場合(これ以外の場合は概要の提出、あるいは任意提出となる)  
—PGxデータ提出に関するドラフトガイダンスからの抜粋—

#### I. 完全な報告書として提出が必須の場合

##### <新薬治験許可申請(IND)段階のPGxデータの提出>

1. PGx試験結果を、臨床試験や安全性の確認のための動物試験の方針決定に用いる場合。例えばその結果が、用量設定、組み入れ基準、安全性モニタリングあるいは対象の層別化に影響を与える場合。
2. 企業が、例えば薬剤の安全性、有効性、用法用量、薬理作用に関する科学的な論証としてPGx試験結果を用いる場合。

##### <新薬承認申請(NDA)、生物製剤の承認申請(BLA)、承認事項一部変更時のPGxデータの提出>

3. 薬剤ラベル(添付文書)に使用されるPGx試験、または承認申請資料の科学的根拠の一部として使用することを企業が意図したPGx試験については、完全な報告書として提出すること。報告書は、新薬承認審査資料の該当部分に試験方法と完全なデータについての情報を含むこと。事例として、
  - ・用法用量、安全性、患者選択、有効性について、企業が科学的な論証とする目的でPGx試験結果を用いている場合。
  - ・添付文書にPGx試験結果を記載することを企業が申し出た場合。
  - ・添付文書に記載された用法用量、安全性、有効性を示すためにPGx試験が必須である場合。

#### II. 略式報告書として提出が必須の場合

##### <新薬治験許可申請(IND)段階のPGxデータの提出>

4. 試験結果が、ヒトにおける生理学的・病態生理学的・薬理的・毒性学的あるいは臨床状態やその転帰について既知で根拠が確実なバイオマーカーになっているか、または、動物実験の安全性結果について既知で根拠が確実なバイオマーカーである場合であっても、バイオマーカー(例:ヒトP450 2D6の場合)の情報が上記1あるいは2の目的で使用されない場合は、その情報はINDでは略式報告書として提出できる。

##### <新薬承認申請(NDA)、生物製剤の承認申請(BLA)、承認事項一部変更時のPGxデータの提出>

5. 試験結果が、関連した動物またはヒトにおける生理学的・病態生理学的・薬理的・毒性学的あるいは臨床状態やその転帰について既知で根拠が確実なバイオマーカーである場合であっても、その結果を企業が科学的な論証として使用しない、または添付文書に記載しない場合には、略式の報告書をFDAに提出すること。
6. 試験結果が、関連した動物またはヒトにおける生理学的・病態生理学的・薬理的・毒性学的あるいは臨床状態やその転帰について、根拠が確実と思われるバイオマーカーとなっている場合、NDAまたはBLAの申請資料で略式の報告書として提出すること。

##### <既承認薬剤の追加審査資料の提出>

7. 既知で根拠が確実なあるいは根拠が確実と思われるバイオマーカーに関する非臨床あるいは臨床PGx試験の結果は、年次報告書のなかで概要または略式の報告書として提出しなければならない。

\*:バイオマーカーは以下の3つに分類される。

Known valid biomarker (既知で根拠が確実なバイオマーカー):よく確立された実行特性をもつ分析試験系で測定され、試験結果の生理的、毒性的、薬理的もしくは臨床的意義について医学もしくは科学コミュニティにおいて広く合意されたバイオマーカー。

Probable valid biomarker (根拠が確実と思われるバイオマーカー):よく確立された実行特性をもつ分析試験系で測定され、試験結果の生理的、毒性的、薬理的もしくは臨床的意義を説明しうるとと思われる科学的枠組みがあるバイオマーカー。既知で根拠が確実なバイオマーカーまでは到達しないバイオマーカー。

Exploratory or research pharmacogenomic data (探索的もしくは研究的PGxデータ)

FDAがPGx試験に関して科学的にしっかりとした規制方針を打ち出すための基盤を築くことである。そのためにFDAの担当者は、①企業が実施したPGx試験での遺伝子座や遺伝子発現プロファイル、②使用した検査システムと手法、③PGx検査を医薬品開発に用いる際に発生した問題、および、④正確性を保持しながら、大量の複雑なPGxデータを送ったり、保存したり、加工する能力などの科学的な課題に対する理解力を高めておきたいと考えているようだ。

ドラフトガイダンスに示されたFDAの以上のような方針に対して、企業など<sup>3)</sup>やNIH<sup>4)</sup>から寄せられたコメントは、①医薬品の適正使用にPGxデータを用いやすくなる、②審査資料の国際的な調和のために他国の当局と連携を図ってほしい、③用語の定義、特にバイオマーカーの定義の明確化を図ってほしい。バイオマーカーを段階化するのではなく、むしろ規制的な意思決定に使用するかどうかで分けるべき、④一般的なバイオマーカーの要件はPGx試験には厳しすぎる。最低限の

受け入れ条件を示すべき、⑤VGDSで提出された資料をFDAがどう取り扱うのかももっと明確にすべき、などであった。コメントが詳細にわたっているのは、各企業が実際に取り組むことを想定しているからであろう。

日本製薬工業協会・研究開発委員会も、ガイダンスに対してPGx研究の実行上の問題となる点に関してのコメントを提出した。

### 医薬品開発におけるPGx研究の役割 (図1)

医薬品の開発には莫大な研究開発費 (394億円：2002年度国内大手20社平均)<sup>5)</sup>と十数年の長い期間を要する。加えて、その成功率は第I相試験以降でも20%程度であり、ほかの分野に比べて開発リスクは高く、企業の負担は大きい。したがって、PGx試験の利用により、①開発候補化合物の絞込み、②初期臨床における薬剤コンセプトの確認、③用法・用量の選択、および、④安全性

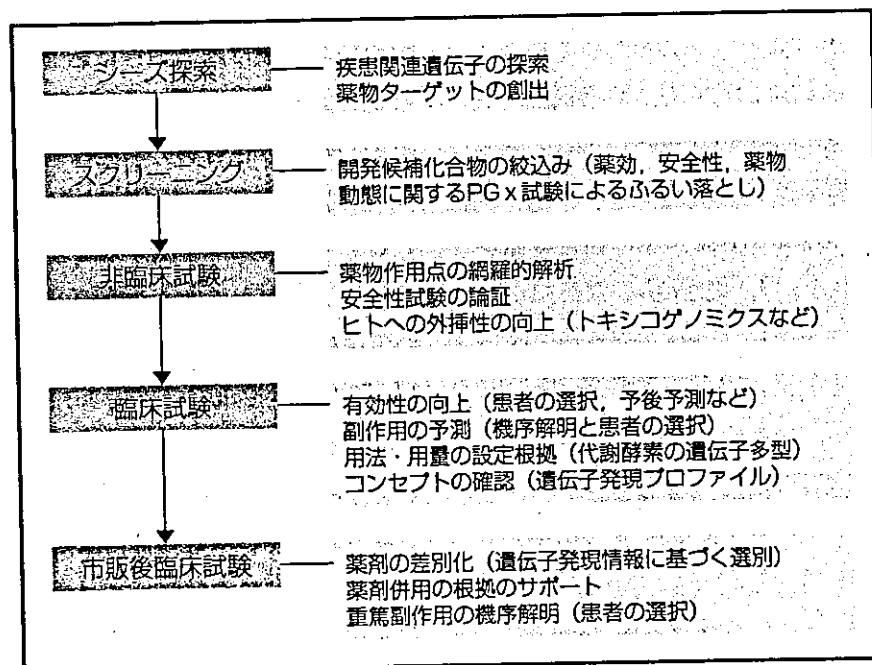


図1 医薬品開発におけるPGx研究の役割

や有効性の向上（患者の選択）が図れるならば、医薬品開発の効率化、開発期間の短縮、成功率の上昇につながり、企業のメリットも大きいと考えられる。また、市販後においても、①新規効能の探索、②同種同効薬との差別化（遺伝子発現情報に基づく薬剤選択）、③薬剤併用の根拠のサポート、および、④重篤な副作用の機序解明などに利用することで薬剤を「育成」し、製品価値を高め、製品寿命を延長できるメリットも考えられる。にもかかわらず、日本の企業が積極的に取り組んでいないのは、①対象を絞るので患者数が減少する（市場が小さくなる）、②治験で同意を得るのが難しくなり（PGx試験への理解が進んでいない）、治験期間が長くなる、③企業にとってのインセンティブが明確でない、および、④治験で得た検体のバンク化が難しい（個人情報の保護システムが確立されていない）などのためである。しかし、新しい技術や情報には医療を変えてきた歴史があるように、むしろ医療に貢献できる有用な新しいツールとして積極的にPGx研究をとらえ、欧米に太刀打ちできるような環境を整備し、この技術を有効に活用していかなければ、世界との競争に伍していけないであろう。

日本製薬工業協会加盟企業でも、この観点から薬物代謝酵素やトランスポーターのSNPsの日本人における頻度解析を目的としたファルマ・スニップ・コンソーシアム（PSC）や、毒性予測システムの開発を目指す厚生労働省との共同プロジェクトであるトキシコゲノミクスプロジェクトを立ち上げ、準備を整えつつある。

## 医薬品開発におけるPGx研究の応用例

ファーマコゲノミクス・ドラフトガイダンスの巻末付録および2003年11月にワシントンで行われ

たFDA-DIA-PGW-PhRMA-BIOワークショップの資料<sup>6)</sup>には多様なPGxデータ提出例が記載されている。そこに記載された例は医薬品開発における代表的なPGx研究の応用例を示すものである。ここではドラフトガイダンス記載例を参考にしつつ、医薬品開発におけるPGxデータの具体的利用例（実例ではなく仮想例）を示すこととする。

### 1) 非臨床試験での利用例

#### 【例1】薬物のターゲット探索

臨床試験中に有効性を示せず、開発が断念されたある候補化合物について、興味ある薬理学的作用を有している可能性が臨床成績から考えられた。そこで、その化合物を用いて実験動物で遺伝学的研究を進め、薬物のターゲットとなる新しい薬理学的プロファイルを見出す予定である。

#### 【例2】開発候補化合物の絞込み

新しいクラスの薬剤を開発しており、効力試験から有効性が期待できる20化合物を臨床開発のために選択した。それらの化合物について、①トキシコゲノミクスデータを用いて動物およびヒトで毒性が予想される薬物を推測する、②ヒト肝細胞を用いた試験で酵素活性に影響する遺伝多型があるCYP2D6もしくはCYP2C19のみで代謝されることがわかった化合物の開発は避ける、および、③ヒト細胞でのターゲット遺伝子の発現パターンからヒトでの効果を予測することなどで優先順位づけし、毒性がもっとも少なく有効性がもっとも強い化合物を選択するのに利用する。

#### 【例3】安全性試験の論証

ある化合物の慢性毒性試験中にラットで白内障が発症した。この知見は安全性を懸念させるものである。企業は毒性機序解明のためトキシコゲノミクス試験を行い、その機序がヒトには起こりえないことを見出した。ヒトでの安全性と白内障リスクがないことの論証としてこのデータを使

用する。

#### 【例4】安全性試験の論証

ラットの2年間のがん原性試験を終了し、腫瘍様のものが腫瘍のできにくい部位である腎臓にあることがわかった。腫瘍様のものは薬剤の投与に関連しない自然発生的なものであり、企業は腎臓の遺伝子発現に対しても薬剤が作用しないことを示すことができた。一方、陽性対照は発がんの既知の経路と一致する遺伝子発現プロファイルを示した。データは薬剤が安全であり、ヒトに腫瘍リスクがないことを論証するために用いる予定である。

### 2) 臨床試験での利用例

#### 【例5】用法・用量の設定

CYP2D6 (もしくはCYP2C19) が主要な代謝経路である薬剤について、第I相試験におけるCYP2D6 (もしくはCYP2C19) 活性の遺伝子型検査を行い、ある集団に特異的な用量を決めるのに用いる。

#### 【例6】薬物濃度の個体間変動の論証

ケトコナゾールとCYP3Aの基質である新薬との相互作用を評価するために、健常成人を用いた臨床試験においてCYP3Aの遺伝子型検査を行った。AUC (area under the curve) の個体間変動への遺伝子多型の相対的関与を評価するためにPGxデータを使用する。

#### 【例7】用法・用量の設定

$\beta$ 受容体のハプロタイプ別に $\beta$ 受容体刺激剤の肺機能改善効果を検討し、最も効きにくいハプロタイプ群でも有効な用量を選定した。以後の試験ではハプロタイプを測定することなく、すべての患者にその選定した用量を投与する。

#### 【例8】有効性の向上

5-HT<sub>1A</sub> Ser22アレルでSSRI抗うつ剤が効きにくいことを企業は見出した。有効性検証試験の第

II相試験で薬物の効果を上げるために、マーカー遺伝子型をもつ人は除外する。

#### 【例9】有効性の向上

第II相試験において、化学療法に先立って生検で得た原発性の肺がん組織の遺伝子発現プロファイルを検討したところ、薬剤投与後に評価した腫瘍サイズに対する効果と相関していることがわかった。そこで、レスポンドとノンレスポンドを定義し、その定義に従い薬剤の効果と相関する92遺伝子を同定した。この予測遺伝子セットを用いて第III相試験を行い、予測遺伝子セットを検証し、添付文書に反映させる。

#### 【例10】有効性の向上

糖尿病性網膜症の治療薬を開発中であるが、病態の進行は個人差が大きい。そこで臨床試験により、網膜症の進行と相関する疾患感受性遺伝子の組み合わせを探索した。網膜症治療薬の第III相試験では、予後が悪いと考えられる患者をこの予測遺伝子セットを用いて選択して網膜症進行予防効果を検討することで、短期間で、かつ少ない症例数で有効性を証明する。

#### 【例11】安全性の向上

ある種のスタチンでは、グルクロン酸抱合酵素の遺伝子多型がCK (creatin kinase) レベルを上げることと、横紋筋融解症のリスクに関係していることが知られている。そこで、新しいスタチンの開発では高用量での安全性プロファイルを改善するためにこの抱合酵素の遺伝子多型患者を臨床試験から除外する。

#### 【例12】薬剤の差別化

新しい抗血小板剤の臨床試験で、心筋梗塞再発予防効果をアスピリンと比較検討したところ同等であった。アスピリンとの差別化を図るためにレトロスペクティブに疾患と関連しそうな遺伝子群を網羅的に解析したところ、一部を除いて両薬剤間で有効な患者層が異なることがわかった。この

結果はさらなる臨床試験で確認後、薬剤の差別化に用いる予定である。

## おわりに

ファーマコゲノミクス・ドラフトガイダンスから、FDAは承認審査へのPGxデータの活用に本格的に取り組む意気込みが感じ取れる。現時点では、VGDSで任意とされているデータの提出も、FDAが経験をつんだ段階では提出が必須となる

ことも予想される。また、海外企業は臨床試験にPGx研究をこれまで以上に取り入れることが予想され、海外展開している日本の企業もPGx研究を避けることはできなくなると思われる。加えて、数年内にはPGxデータを有する海外で開発された医薬品が国内に入ってくるのが予想される。国内企業も必要にせまられてあわてて取り組むのではなく、PGx研究の有用性を認識し各種のインフラ整備を急ぐとともに、必要性に応じて柔軟にPGx研究に取り組むことが重要であろう。

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- 問題と大きく関わる。この問題については後述する。
- ③採血のような、最小のリスクのみを含む活動であること。データも研究利用されるときは、匿名化され個人識別性を持たない。追跡調査の目的で、個人識別情報の別途継続的管理が必要である場合も、研究取扱いのときには匿名であり、最小リスクに含める。しかし、研究に利用される人に由来する情報の多様化と増大により、匿名化が難しくなったことは、大きな問題として議論された。この問題は、UNESCOの「ヒト遺伝情報に関する国際宣言(案)」(2003年)の中でも指摘されている。実際に、米国の有権者登録名簿を別の公開されているデータベースと照会することで、個人の特定ができることが発表された。
- ④研究成果が社会にもたらす恩恵について、長期的研究であり社会にとっては意味があるが、個人への意味は少ない。日本では生活習慣病が個人的病気であり、自己管理による健康観が主流であることから、その延長上として、オーダーメイド医療や個の医療として、個人への恩恵が強調されるかたちでゲノム研究が宣伝されている。これは短期のマーケティングとしては成功しているが、生活習慣病のゲノム研究の本質からは遠いといわざるを得ない。現実的な誇張のないゲノム研究の姿が説明され、理解される必要がある。

もちろん、既存、新規を含めて、この定義に合致しない研究計画もある。しかし重要な点は、大規模というだけではなく、社会基盤として整備されるこのデータベースの汎用性である。

このWSは、“Issue of Privacy and Security”に問題を限った議論を展開する目的で開かれた。そこでプログラムは、Welcome AddressののちWSの目的が紹介され、続いて①既存のHGRDの状況(この中で前述の定義が述べられた)、②守秘とデータ管理、③データベースへの研究目的でのアクセス、④データベースの所有権と商業化、⑤HGRDのガバナンスという五つのセッションによって構成される。本稿では、コンセントとガバナンスに焦点を当て紹介する。

### 3. HGRDの構築が持つ意味

動物実験の場合には、人為的に均一なゲノム組成を持つ動物を作成し、コントロールされた環境で飼育し研究に利用することにより、その科学性が飛躍的に高まった。尊厳を持つ人の場合には、人為的介入はでき

ないので、後づけで均一な性質を持つ人集団をグループ化する。ゲノム情報は、ヒトという一生物種の多様な生物学的特性を担う情報であると同時に、個人識別情報でもあり、人集団のグループ化に適する情報である。さらに、収集された健康情報、病歴、生活習慣情報、家系情報をデータベース化し、同じ傾向を持つ人集団を選び出しグループ化し、グループの間での比較研究を行う。その成果は確率で表され、例えば公衆保健行政が医療資源の効率的・公正な配分を計画する場合には意味を持つが、個々人の健康に関する判断を決定できる性質のものではない。

このような研究スタイルは、人の「体質」といわれるものがゲノム情報の個人差によって分類できるという仮説に支えられている。人は個々人の間で0.1%の配列差を持つという。これは、600万文字分に当たり、普通の国語辞書2冊分に相当する。逆に考えると、それだけの膨大な差異を持ちながら、人は種として一定の範囲で問題なく生きていけるのである。生活習慣病の研究は、この膨大な差異の中から、貢献度は低い病気発症に多様な関与をする差異を選び出すという、気の遠くなる研究なのである。それらの遺伝子の関与は、タバコの健康被害よりも低いだろうと考えられている。それだけに、統計学的に有意な研究成果が出たとしても、それを公衆保健政策に生かすことは別の難しさがある。タバコの健康への害をアピールするだけでは、禁煙を誘導することは難しい。それは、確率的に示される危険性を免れる人たちがいることを我々は普段の生活から知っているからでもある。

### 4. 西欧での危機感

ゲノム研究の持つ問題点は、国際的にも欧米諸国においても真剣に検討が行われている。紆余曲折はあるにしても、進展してきた個人主義的人間観への挑戦として、ゲノム研究の問題を捉えることがこの危機意識の契機となっていると考えている。新しい哲学的観点なしに乗り越えることができないのではないかと主張されるのは、このような西欧社会の根底に関わる主題を含む可能性があるからではないだろうか。このWS自体は、哲学的問題へ深入りすることを避けるかたちで運営されたが、この問題は避けがたく、議論のそここに顔を出していた。このような危機感は、日本では三省ゲノム研究指針策定(2001年)後には姿を消した問題意識である。

従来の定言命法的倫理観では支えきれない問題として、ゲノム研究の問題を捉えている。それは、倫理委員会の委員に求められる資格の話で鮮明に出た。生命倫理の専門家(bioethicist)による安易な解決という考えを排除して、法律、哲学、社会学、生物学、医学、一般市民というそれぞれの専門性(素人にしても professional layといわれるように)を持つ委員によって構成される委員会を求める姿勢が主張され、受け入れられた。ゲノム研究の求める規範システムは、技術的進展の速さとそのインパクトの大きさという両側面からの要請である。その中で、同時進行と継続的可塑性をガバナンス(信用を得るためのメカニズム)として組織することの難しさに、倫理委員会が直面すべきであるということかもしれない。

## 5. UNESCO での議論

1997年11月に採択された「ヒトゲノムと人権に関する世界宣言」を発展させた「ヒトゲノム情報に関する国際宣言(案)」が、昨年(2003年)の6月と10月に発表されている。それらを比較検討することによって、HGRDの広がりや今後について示唆を得たいと思う。

まず、最初に驚かされることは、この宣言がゲノム情報だけでなく、プロテオミクス解析情報、さらに解析に用いる人体試料を視野に入れていることである。この宣言が、モノと情報の収集、処理、利用、保管に対して原則として適用されるとする。

そして、この前文の中では、情報の収集が進むにつれて、完全に連結不可能匿名化することが困難となること、ゲノム情報が世代を超えて子孫を含む家族に対して、事例によっては集団全体に対して、重大な影響を及ぼすことなどが述べられている。これらの認識は前に述べた HGRD の定義に合致する視点といえる。

研究への資料提供に関しては、前もっての、自由な、情報を提供された、明示的な、利益誘導によらない承諾を基本とする。承諾を得ないで収集できる場合として、国際人権法に抵触しない、国内法によって規定されるやむを得ない事情による場合を挙げている。6月版では national legislation or regulation(国内立法または行政規則)が、10月版では domestic law(国内立法、判例法、行政規則;国内法)となっている。UNESCO 事務局がフランスにあり、仏圏は英語圏と法体系が異なり詳しいことは分からない。6月版の記述に判例法が含まれないことが英米法においては問題

であったと考えられる。後に述べるように、海外の代表的 HGRD は議会制定法によって規制されている(①参照)。それを裏づけるように、第14条(d)において、医科学研究の目的で収集されたヒト遺伝子情報、プロテオミクス情報や生物試料を、特定の個人とリンク可能な状態(連結可能匿名化)で研究利用できるのは、研究実施上必須な場合であって、プライバシーの保護と、情報と生物試料の守秘が国内法によって保証される場合という条件を挙げている。詳しくは、宣言が正式に決まったときに検討されるべき問題である。しかし、ここで注目したいのは次の2点である。

①改訂の方向性からいうと、モノと情報の利用、特に既存や目的変更を含む場合には、国内法による研究体制の規定が予想されること。アイスランド、エストニア、スウェーデン、英国の大規模ゲノム研究計画において、前二者は特別法で、後二者は既存の法律体系の縛りを受けるかたちで研究が計画されている。先進国でのゲノム研究が国内法のもとで実施されることを標準とすることが当然となっているようである。ゲノム研究の形態が決定的に市民生活に近くなった現在、国内法による規制は当然のことと考えられているようである。また、開発途上国におけるゲノム研究体制への一定の縛りとも考えられている。

②情報のみでなく、そのもとになる試料を規制対象として並列していること。そして、試料(モノ)に注目したのは、試料からは収集時には予想もされなかった新しい情報が読み出される可能性があり、収集時には、そこから得られる情報について予測することが困難である点としている。

## 6. ガバナンスの枠組みの概要

HGRD を規制することの難しさについて述べたが、市民社会を深く巻き込むかたちで構築される HGRD は、法体系だけで支えられるものではない。ガバナンスという言葉が重要性を持つといわれるゆえである。研究の本質が持つ未来性・仮説性・想像性の入り込む余地の少ない「明確な尺度」により、研究の公正性・正当性を判断することは困難になってきている。特に、HGRD の定義の②や④で述べた、特定の仮説に依存しない集団の研究という性格は、困難な状況を生んでいる。

ガバナンスという言葉は流行言葉であるが、その実

態を表現することは難しい。WSの中では、「利益を異にする公式・非公式のグループ間での交渉を経た、可塑性を持つ合意への道のりを可能にする公式・非公式のシステム・構造」と表現された。その要件の中で、transparency(透明性)と openness(可塑性)を重要な概念として示し、それらをつなぐ responsibility(批判に対応する力)を位置づけている。要件については、このほかに public engagement(社会との連携)、participation(参加)、accountability(責任の明確化)、effectiveness(効果)、coherence(首尾一貫性)を挙げている。

透明性は、研究がどのように行われているかを明らかにする機構であり、外からの批判を得るためのメカニズムである。その批判に対応し、自らを変える可塑性が求められる。そして、この批判に応える能力が responsibility と考えられる。この批判に応える能力の中核が自律であると筆者は考える。

ガバナンスに関して、このように周到的な要件のチェックリストが用意されても、これを単純に当てはめることでガバナンスが成就されるものではないと何度も強調された。そこで、失敗例の研究から、ガバナンスについて知ることが重要であると指摘され、失敗の原因として主に①個人と社会・集団との利益相反、②歩み寄ることの失敗、③過度の単純化という、三つの要因が挙げられた。

## 7. 専門家の自律

日本でもこの5年、人体由来の資料を利用した医学・生物学研究の倫理問題が検討され、多くの研究倫理指針が策定された。筆者は細胞バンクという研究専門家を相手にする仕事をしている。その中で痛切に感じることは、この5年間の研究倫理の議論を経て、研究の専門家たちにとって、この問題が外部の「倫理の分かっている先生方の問題」として捉えられ、自分にとっては、外からはめられた指針を守ることによって解決できる問題として捉えられるようになってしまったことである。

この状況について、WSでアイスランド哲学者と話をした。彼が「研究者は reactive になり、responsible ではなくなったということだね」とまとめたのは印象的であった。彼は発表の中で「被験者の autonomy を尊重する」ということでは、研究者の本来の意味での autonomy は育たないという、根本的問題意識を

披瀝している。

前に述べたガバナンスという機構を日本の中で構築するためには、研究の専門家の自律が重要な礎石となる。ここで考えるべきことは、自分たちの領域を護る姿勢から生まれる発言は、自律とは反対の方向性を持つことだ。前に述べたガバナンスの要件の中で、openness が日本の議論で抜けているのは、前に述べた研究倫理の基本が被験者の保護や尊重という「他人事」に終始しているところにあると筆者は考えている。

## 8. コンセントの問題

従来のゲノム研究は、特定の仮説を持った明確な研究計画の説明に依存したインフォームド・コンセント(IC)により支えられるものであった。しかし、このWSで検討されたHGRDは従来のICでは支えきれない、場合によっては、個人の同意によって支えきれないという性質を持つ。このWSの中でも community engagement という言葉が使われた。特に、国際的比較研究の中では「何々人は、何だから」という差別が生まれる可能性があるという。個人の差別でも問題が深かったのに、血縁の差別、さらに集団の差別。そして明確な理由に基づいての差異の指摘だけでなく、不確かなものまで含めると、思いもよらなかった方向へとゲノム研究の成果が波及する可能性は否定できない。

日本においては、この会で議論をされたような研究インフラとしてのHGRDを作る動きはない。明確な研究プロジェクト単位でゲノム研究を構築することで、この会で議論された先に広がる問題を回避している。しかし、長期のプロジェクトであっても、いつかは終わるものである。その間に集められたモノと情報をどのように次へ活かすのか。そのためには、この会で議論をされたガバナンスを真剣に考える必要がある。コンセントでは解決できない問題を社会に受け入れられるかたちで議論できる土俵を作るために、礎石を運び、しかるべき場所に据えておく必要がある。

UNESCOでの議論を紹介したのは、WSでは明確に提出されなかった諸問題への示唆を受けるためである。現在日本でも大きな問題である既存試料の問題、初期の目的と異なった使い方などについて、これを機会に議論をしておく必要があるだろう。現在のように、負うことができない重荷をICに押しつけることでは問題は解決しないのである。