医药卫生法律资讯

Health Care Legal Newsletter

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大成律师事务所 医药卫生法律研究团队

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一、最新出台的医药法律法规

New Laws and Regulations on Medical Care Field

(一)《关于贯彻落实推进医疗服务价格改革意见的通知》

The Circular on Implementing and Promoting the Opinions on Medical Service Pricing Reform

1. 颁布详情 Enacted details

- 1) 颁布部门 Promulgated authority: The General Office of the National Development and Reform Commission
- 2) 颁布日期 Promulgation date: Aug16,2016
- 3) 生效日期 Effective day: Aug16, 2016

2. 跟踪报道 Related content

2016年8月16日,国家发改委办公厅下发《关于贯彻落实推进医疗服务价格改革意见的通知》 (下称《通知》)。

《通知》提出借鉴县级公立医院医药价格改革经验、建立改革工作联系示范点制度、充分发挥信息化特别是大数据作用等10个方面的举措。根据《通知》,前期已先行开展改革的地区,要逐步降低大型医用设备检查治疗和检验价格,规范诊疗行为,降低药品、耗材等费用;尚未实施改革的地区,要加快落实取消药品加成政策,调整医疗服务价格。《通知》规定,要加强医疗机构内部管理和行业监管,推进医疗服务收费信息公开。

On Aug16,2016, the General Office of the National Development and Reform Commission has issued the Circular on Implementing and Promoting the Opinions on Medical Service Pricing Reform (the "Circular").

The Circular proposes various measures from 10 perspectives, such as learning from the experience gained in the medicine pricing reform of public hospitals at county level, establishing the mechanism of reform contract exemplary base, and maximizing the role of information technologies especially the big data. According to the Circular, places where such reform has been carried out in advance shall reduce the price of examinations and treatments provided through large medical equipment gradually, regulate the diagnosis and treatments, and reduce the price of medicine and consumable items; other places where such reform has not been implemented yet shall implement the policy of stopping the addition of extra prices to medicines more rapidly, and adjust the price of medical services. The Circular also stipulates that it is necessary to enhance the internal management of medical institutions and industrial supervision and promote the information on the price of medical services accessible to the public.

3. 详情 Details: 《关于贯彻落实推进医疗服务价格改革意见的通知》全文

The Circular on Implementing and Promoting the Opinions on Medical Service Pricing Reform



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(二)《医疗器械召回管理办法(征求意见稿)》

The Administrative Measures for Medical Device Recalls (Draft for Comment)

1. 颁布详情 Enacted details

- 1) 颁布部门 Promulgated authority: The General Office of the China Food and Drug Administration
- 2) 颁布日期 Promulgation date: Sep1,2016
- 3) 截止日期 Expiration date: Sep30, 2016

2. 跟踪报道 Related content

2016年9月1日,国家食品药品监督管理总局办公厅对《医疗器械召回管理办法(征求意见稿)》(下称《征求意见稿》)公开征求意见,意见反馈截止于9月30日。

《征求意见稿》明确,医疗器械召回是指医疗器械生产企业对已上市销售的缺陷产品采取警示、检查、修理、重新标签、修改并完善说明书、软件升级、替换、收回、销毁等方式进行处理的行为。根据《征求意见稿》,召回产品的范围包括"不符合强制性标准、经注册或者备案的产品技术要求的产品"等4种情况。《征求意见稿》要求,医疗器械生产企业应当主动对缺陷产品实施召回,且一级召回应在1日内,二级3日,三级7日,并通知到有关经营企业、使用单位或者告知使用者。

On Sep30,2016,the General Office of the China Food and Drug Administration (the "CFDA") has recently issued the Administrative Measures for Medical Device Recalls (Draft for Comment) (the "Draft") for public comment by September 30.

The Draft states that the term "medical device recalls" refer to the handling of defective medical device products already released to the market by medical device manufacturers by means of warnings, product checks, repairs, relabeling, revision and improvement of product manuals, software upgrading, product replacement, recovery, or destruction or otherwise. According to the Draft, product recalls cover products in any of the four circumstances including "products not conforming to mandatory standards or their registered or filed product specifications". The Draft requires that medical device manufacturers shall voluntarily recall defective products and that the First Grade Recall shall be completed within one day, the Second Degree Recall within three days, and the Third Degree Recall within seven days, together with efforts to notify the business operators, institutional users or individual users concerned.

3. 详情Details: 《医疗器械召回管理办法(征求意见稿)》全文

The Administrative Measures for Medical Device Recalls (Draft for Comment)

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(三)《药品注册管理办法(修订稿)》

The Administrative Measures for Drug Registration (Draft Revision)

1. 颁布详情 Enacted details

- 1) 颁布部门 Promulgated authority: The General Office of the China Food and Drug Administration
- 2) 颁布日期 Promulgation date: Jul27,2016
- 3) 截止日期 Expiration date: Aug26, 2016

2. 跟踪报道 Related content

近日,食药监总局办公厅公布《药品注册管理办法(修订稿)》(下称《修订稿》),面向社会征求意见,意见反馈截止于8月26日。

《修订稿》包括八章147条,适用于中国境内药品注册及监管。《修订稿》在定义"药品注册"的基础上,进而规定,境外合法制药厂商办理药品注册,应由其驻中国境内的办事机构或由其委托的中国境内代理机构办理。鼓励以临床价值为导向的药物创新,对依法需要加快审评的药物优先审评。《修订稿》要求,食药监总局建立争议解决机制,通过专家咨询、复审和行政复议解决审评审批过程中存在的争议问题;涉及公共利益的重大许可事项,应向社会公告并听证。《修订稿》还列明,药品上市申请审评应重点关注"创新药的临床价值"等七方面内容。

The General Office of the China Food and Drug Administration ("CFDA") has recently promulgated the Administrative Measures for Drug Registration (Draft Revision) (the "Draft Revision") for public comments by August 26.

The Draft Revision, consisting of 147 articles in eight chapters, applies to drug registration and the supervision and administration thereof within the territory of China. The Draft Revision, based on the definition of "drug registration", stipulates that in making application for drug registration, a legally established foreign pharmaceutical company shall appoint its office within the territory of China, or authorize an agent within the territory of China to carry out the application. Clinical-value-oriented drug innovation is encouraged, and priority shall be given to the review of drugs calling for quicker review in accordance with the law. The Draft Revision requires that the CFDA shall build a dispute settlement mechanism under which expert consultation, reexamination and administrative reconsideration may be adopted to resolve issues in dispute existing in the review, examination and approval process; for major licensing matters involving public interests, announcements shall be made to the public and hearings shall be held. The Draft Revision also sets out the seven aspects of contents to which key attention shall be paid in reviewing an application for drug marketing, including "clinical value of innovative drugs".

3. 详情Details: 《药品注册管理办法(修订稿)》全文

The Administrative Measures for Drug Registration (Draft Revision)

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(四)《关于进一步加强医疗养生类节目和医药广告播出管理的通知》

The Circular on Further Enhancing the Administration of Broadcasting Medical and Health Care-related Programs and Medical Advertisements

1. 颁布详情 Enacted details

1) 颁布部门 Promulgated authority: The State Administration of Press, Publication, Radio, Film and Television

2) 发布日期 Promulgation date: Aug29,2016

3) 生效日期 Effective date: Aug29,2016

2. 跟踪报道 Related content

2016 年 8 月 29 日,国家新闻出版广电总局下发《关于进一步加强医疗养生类节目和医药广告播出 管理的通知》(下称《通知》)。

《通知》要求,医疗养生类节目只能由电台电视台策划制作,不得由社会公司制作;严格医疗养生类节目备案管理,未经备案的医疗养生类节目一律不得播出。《通知》强调,严格医药广告播出管理:严禁播出任何虚假医药广告,严格限制医药广告播出的时长和方式,医疗、药品、医疗器械、保健品、食品、化妆品、美容等企业、产品或服务的广告,不得以任何节目形态变相发布,不得以电视购物短片广告形式播出,且单条广告时长不得超过一分钟。

On August29,2016, the State Administration of Press, Publication, Radio, Film and Television has issued the Circular on Further Enhancing the Administration of Broadcasting Medical and Health Care-related Programs and Medical Advertisements (the "Circular").

According to the requirements of the Circular, medical and health care-related programs shall be planed and produced by radio stations or television stations only, instead of by any social company; the record-filing of medical and health care-related programs shall be strictly administered, and those that have not been filed for the record shall not be broadcasted with no exception. The Circular emphasizes that it is necessary to tighten the administration of broadcasting medical advertisements by prohibiting the broadcast of any false medical advertisement, strictly restricting the length and method to broadcast medical advertisement, and preventing the broadcast of advertisements for enterprises, products or services concerning medical treatment, medicine, medical devices, health care products, food, cosmetics, and beauty in any disguised form of TV programs or in the form of TV shopping video clips; and the length of each piece of advertisement shall not exceed one minute.

3. 详情 Details: 《关于进一步加强医疗养生类节目和医药广告播出管理的通知》全文

The Circular on Further Enhancing the Administration of Broadcasting Medical and Health Care-related Programs and

Medical Advertisements

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二、经典案例解读

Interpretation of typical cases

药企价格垄断协议罚款高达760万1

Pharmaceutical companies have been fined up to 7.6 million for price monopoly agreement

2016年5月22日,国家发改委发布《关于在全国开展药品价格专项检查的通知》(简称"通知")(**发改价监(2016)1101号**),为规范药品价格行为,维护药品市场价格秩序,保障人民群众合法权益,经研究,决定从6月1日起开展全国药品价格专项检查。

此次专项检查对象为药品生产经营企业(含原料药及药品的生产企业、流通企业和社会零售药店)、 医疗机构(含非公立医疗机构)、疾病预防控制中心、血站、药品集中招标采购平台、药品采购机构以 及相关行业协会。检查重点要放在价格出现异常波动的原料药、药品品种。

同时,通知明确此次专项检查重点查处以下行为: (一)原料药、药品生产经营企业达成、实施垄断协议的行为,行业协会组织生产经营企业达成、实施垄断协议的行为; (二)原料药、药品生产经营企业滥用市场支配地位,以不公平高价销售原料药、药品的行为; (三)社会零售企业虚构原价、误导性价格标示等价格欺诈行为; (四)医疗机构不执行政府定价药品零差率、加价率政策的行为; (五)政府定价药品突破政府规定的最高出厂(零售)价格销售的行为; (六)不按规定执行明码标价、价格公示制度的行为; (七)其它违反《价格法》、《反垄断法》的行为。

从发改委近大半年处罚决定作出的内容来看,目前主要集中于对药企垄断协议行为的规制。截止至 2016 年 7 月 27 日,国家发改委对药品价格垄断的处罚金额已高达 760 万。以下是对药品垄断协议案的简要分析:

	发改委依法查处别嘌醇片垄断协议案	发改委依法查处艾司唑仑药品垄断协议案
处罚 时间	2016年1月28日	2016年7月27日
药品 简介	1. 别嘌醇片是治疗因尿酸过高引起的高尿酸血症、痛风的常用药物。 2. 别嘌醇制剂属于国家基本医疗保险药品目录中的甲类药品,别嘌醇片还列	1. 艾司唑仑具有镇静、催眠和抗焦虑疗效, 是国家严格管控的二类精神药品,艾司唑仑 片属于国家基本药物目录中的神经系统用 药,同时列入国家低价药目录。

 $^{^{1}}$ 本文由北京大成(上海)律师事务所沈涛律师团队编辑,转载需经许可。

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入了国家基本药物目录和国家低价药 目录,价格低廉,在临床上广泛使用。

- **3.** 全国获得别嘌醇片批准文号的生产 厂家有 15 家。
- **4.** 2012 年至 2013 年实际有 7 家企业生产别嘌醇片。
- **5.** 2014 年以来实际只有**重庆青阳、江苏 世贸天阶、上海信谊联合** 3 家企业生产 别嘌醇片。
- 2. 我国对二类精神药品原料药的准入和生产实行严格管制
- 3. 全国获得艾司唑仑原料药生产批文的企业 只有 4 家
- **4.** 实际在产的只有**华中药业、山东信谊**和**常 州四药**,这 3 家企业同时也是艾司唑仑片的 生产厂家。

2014年4月以来,重庆青阳及其关 联公司、江苏世贸天阶、上海信谊联合 及其独家经销商,作为经销青阳、世贸 天阶、信谊品牌别嘌醇片的三方,先后 四次召开会议,统一提高别嘌醇片的销售 售价格,划分别嘌醇片的销售区域。

查明 事实

1. 协商统一上涨价格

2014年4月,三方协商将别嘌醇片销售价格提到每瓶不低于18元,投标价格不低于20元。

2. 分割销售市场,约定招投标

三方必须在划定域内进行销售或 者招投标,不得到其他区域销售、投标 或议价。 2014年低价药政策出台后,3家企业通过会议、会面、电话、短信、邮件等方式,在艾司唑仑原料药市场达成并实施了联合抵制交易的垄断协议,在艾司唑仑片剂市场达成并实施了固定或变更商品价格的垄断协议。2014年9-10月间,当事人在河南郑州举行会议,协商艾司唑仑原料药和片剂的有关安排。

1. 原料药禁止外销

三方协议艾司唑仑原料药仅供本公司生 产片剂使用,不再外销,促使大部分片剂生 产企业由于缺少原料药而被迫停产。

2. 对艾司唑仑片剂集体涨价形成默契

三方通过下发调价函的形式逐步调高艾 司唑仑片剂价格,华中药业和山东信谊多次 通过会面、电话、短信等形式就调价信息进 行沟通联络,促使药品出厂价翻倍甚至更高 增长。

法律 依据

具有竞争关系的三方经营者,达成 并实施统一上涨别嘌醇片价格、分割销 售市场的垄断协议,违反了《**反垄断法》** 第十三条第一、第五款的规定。 具有竞争关系的当事人达成并实施的艾司唑仑原料药联合抵制交易的垄断协议,使 其他片剂生产企业由于缺少关键投入品而被 迫退出市场,严重违反了**《反垄断法》第十**

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处罚

结果



根据垄断行为的性质、程度、持续 时间,以及当事人在垄断协议中的不同 作用,国家发改委依法责令当事人立即 停止实施垄断协议,并处罚款:

一、对在达成并实施垄断协议过程中处于主导地位的重庆青阳及其关联销售企业重庆大同,处上年度销售额8%的罚款,计180.52万元。

二、对能够积极配合调查、如实提供证据材料的江苏世贸天阶,处上年度销售额 5%的罚款,计 118.40 万元。

三、对能够积极配合调查、如实陈述相关事实的上海信谊联合、商丘华杰,分别处上年度销售额5%罚款,计49.56万元、51.06万元。

根据垄断行为的性质、程度、持续时间, 以及当事人在垄断协议中的不同作用、对调查的配合程度等因素,依法责令当事人立即 停止实施垄断协议,并处罚款共计 2603823 元,其中:

三条第五款的规定。

- 一、对在垄断协议的达成、实施过程中起主导作用,处 2015 年度艾司唑仑片销售额百分之七的罚款,计 1571829 元;
- 二、对垄断协议的参与者、在调查过程中配合行政机关查处违法行为且有立功表现的山东信谊,处 2015 年度艾司唑仑片销售额百分之二点五的罚款,计 547563 元;
- 三、对垄断协议的跟随者、违法程度较 轻且能积极主动整改的常州四药,处 2015 年 度艾司唑仑片销售额百分之三的罚款,计 484431 元。

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三、专业文章

Professional Articles

医药虚假违法广告处罚案例分析及合规建议2

Case studies and Compliance suggestions on Pharmaceutical false and illegal advertisements penalty

新广告法实施一周年之即,上海工商局对一年内典型违法广告进行了公示。根据上海市工商局的统计数据显示,在违反新《广告法》的 424 件广告案件中,虚假广告的案件数量最多,占总数的 25%,例如爱吉(上海)房地产经纪有限公司在广告中杜撰宣称"中国消费者协会琅琊榜",是较为典型的虚假广告。其次是违法使用绝对化用语的广告案件,占总数的 22%,该类案件的罚没款占总量的 35%。<u>违法使用医疗用语或者易与药品、医疗器械相混淆的用语的广告案件数量位居第三,此类违法情形多发于食品、</u>化妆品,以及与健康相关的家电和生活产品的广告。上述三类广告案件占总量 64%,罚没款占总量 58%。

下列是三个典型的已被工商(市场监管)部门依法查处、与医药相关的虚假违法广告:

1. GUNNAR 护目镜(生活用品)

违法主体: 慧讯光学商贸(上海)有限公司

发布媒介:网络商品交易平台。

违法行为: 当事人在网络商品交易平台的护目镜商品展示广告中含有"世界护眼第一品牌,质量不可置疑"的内容,违法使用绝对化用语,还查明当事人以删除线标注的商品原价实际并不存在,上述行为被依法处罚款 29 万元。

2. 易能细胞能量仪(家用电器)

违法主体: 上海自愈力健康科技有限公司

发布媒介:企业自有网站。

违法行为:宣称其销售的"易能细胞能量仪"对"糖尿病、前列腺炎、膝关节炎、中风后遗症"等十几种疾病具有疗效。经查证,该产品为功能性家电产品,所谓"疗效"内容均为当事人杜撰,构成虚假广告,被依法处罚款 20 万元。

²北京大成(上海)律师事务所沈涛律师团队整理,转载需经许可。

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3. 万艾可(药品)

违法主体: 上海崇明第一医药药业连锁有限公司庙镇店

发布媒介:店堂。

违法行为: 药企零售代表在当事人的店堂内张贴含有"万艾可® VIAGRA® 伟哥"等处方药内容的彩页广告。当事人作为公共场所管理者和专业的药品销售者,明知、应知相关法律禁止处方药面向公众进行广告宣传,但并未制止上述违法广告行为,被依法处罚款 1 万元。

法律风险警示:

- 1. 《广告法》第四条规定:广告不得含有虚假或引人误解的内容,不得欺骗、误导消费者。《广告法》第二十八条规定:广告以虚假或者引人误解的内容欺骗、误导消费者的,构成虚假广告。该条并列举了虚假广告的五种情形。发布虚假广告将承担严厉的行政法律责任和民事法律责任,构成犯罪的,还将被追究刑事责任(详见《广告法》第五十五条和第五十六条)。郑重提示,真实是广告的生命,工商部门将始终坚持严厉查处欺骗、误导消费者的各类虚假广告!
- 2. 《广告法》第九条第(三)项规定:广告不得使用"国家级"、"最高级"、"最佳"等用语。该条款所指用语,也包括与"最高级"有相同含义的其他词语。广告中使用此类词语,有可能构成违反《广告法》的违法广告行为,依据《广告法》第五十七条的规定,违法广告涉及的广告主、广告经营者和广告发布者可能被处二十万元以上一百万元以下的罚款,情节严重的,并可能被吊销营业执照。郑重提示,为遵守法律、降低法律风险,建议有关企业认真审查广告内容,避免出现"最高级"、"最佳"等绝对化用语!
- 3. 《广告法》第十七条规定: 除医疗、药品、医疗器械广告外,禁止其他任何广告涉及疾病治疗功能,并不得使用医疗用语或者易使推销的商品与药品、医疗器械相混淆的用语。违反该条款的广告,最高可被处广告费用五倍,或一百万元的罚款(详见《广告法》第五十八条)。郑重提示,非国家食药监认证的医疗、药品、医疗器械,不得使用"涉及疾病治疗功能"或"与药品、医疗器械相混淆"的广告用语,要严格把控企业生产的家用电器与医疗、药品、医疗器械的区别。

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四、医药行业监管动态

Pharmaceutical Industry regulatory update

(一) 北京市食药监局立案调查三大订餐平台3

Beijing Food and Drug Administration Initiates Investigation into Three Major Online Takeaway Ordering Platforms

近日,北京市食药监局网监中心排查了百度外卖、饿了么、美团三大平台上没有资质的订餐商户,将其中60家向社会公布,并将对三大平台立案调查。据统计,目前三大订餐平台共下线无照无证商户12000余家。相关监管部门已开始利用高科技手段对互联网违法行为进行搜索监测,今后北京市食药监局将每周公布平台资质欠缺商户名录,并鼓励公众投诉举报。

2016年上半年,北京市食药监投诉举报中心共收到对三大订餐平台的投诉举报228件,其中百度外卖平台下线了1000余家问题商户;美团下线9000余家商户;饿了么"3·15"后累计下线近2200家商户。

Recently, the Network Supervision Center of the Beijing Food and Drug Administration has checked and identified all unqualified restaurants registered on three major online takeaway ordering platforms, namely Baidu Waimai, Ele.me and Meituan, disclosed 60 restaurants therein to the public and opened an investigation into these three platforms. It is understood that there three major platforms have so far withdrawn a total of about 12,000 restaurants that have neither the business license nor the catering service license. Relevant supervision departments have already used high technologies to search and monitor any violations committed on the Internet. The Beijing Food and Drug Administration will publish a list of restaurants registered on such platforms without proper qualifications on a weekly basis from now on and encourage the public to make complaints and reports.

In the first half of 2016, the Compliant and Report Center of the Beijing Food and Drug Administration received a total of 228 complaints or reports targeted at the aforesaid three major platforms, and thus Baidu Waimai withdraw over 1000 defective restaurants from its platform, Meituan over 9000 restaurants, and Ele.me almost 2200 restaurants after "3.15" Consumer Rights Day.

 $^{^3}$ 摘自北京晚报 Reproduced from Beijing Evening News.

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(二) CFDA: 普遍开展食药监管公职律师工作

CFDA: Policy of Government Lawyers in Food and Drug Administration to Be Widely Implemented

2016年8月15日,食药监总局出台《关于全面加强食品药品监管系统法治建设的实施意见》(下称《意见》)。

《意见》提出,到2020年,科学完备的食药安全法律制度体系基本建成,高素质的专业化监管队伍基本建立,法治精神、法治理念与法治思维得到深入普及,职能清晰、执法严明、公开公正、廉洁高效的食药监管部门基本建成。据此,《意见》确立"加快食药监管法律体系建设"等八项主要任务,涵盖"完善食药监管立法工作机制"等23项具体措施。《意见》指出,完善食药监管法律顾问制度,建立以监管部门法制机构人员为主体、吸收法学专家和律师参加的法律顾问队伍。同时,细化相关行政执法程序,规范行政处罚、行政强制等行为,落实执法全过程记录制度。

On August15,2016, the China Food and Drug Administration has issued the Implementing Opinions on Comprehensively Strengthening the Rule of Law Construction in the Food and Drug Administration System (the "Opinions").

It is proposed in the Opinions that by 2020, a scientific and complete legal system for the food and drug safety would have been basically achieved, a high-quality professional administrative team would have been basically organized, the spirit, concept and thinking of rule of law would have been popularized deeply, and a food and drug administrative department that is open, impartial, honest and highly-efficient with clear responsibilities and functions as well as strict law enforcement. Accordingly, the Opinions specify eight primary tasks, such as accelerating the construction of legal system for food and drug administration, which cover a total of 23 specific measures including the improvement of legislation mechanism for food and drug administration. Also, the Opinions point out that it is necessary to perfect the legal counsel system for food and drug administration, build up a team of legal counsels the majority of which are functionaries of the legal offices under the administrative department and which also welcomes legal experts and lawyers. Meanwhile, it is required to detail the procedures for relevant administrative law enforcement, regulate such behaviors as the administrative sanctions and administrative enforcement, and implement the regime of recording the whole process of law enforcement.

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(三) CFDA: 发布三个临床试验的数据采集和管理相关的规范性文件

CFDA: Posted three clinical trial data collection and management-related regulatory documents

针对我国临床试验数据长期存在的问题以及由此对药品研发和药品技术审评造成的不良 影响, 国家食品药品监督管理总局(CFDA)于 2016 年 7 月 27 日连续发布三个规范性文件。

2016年7月27日,为确保临床试验数据的真实、准确、完整和可靠,强化药物临床研究的自律性和 规范性,从源头上保证药品技术审评的质量,国家食品药品监督管理总局组织制定了《临床试验数据管 理工作技术指南》(国家食品药品监督管理总局通告 2016 年第 112 号), 自本通告发布之日起执 行。

2016年7月27日,为加强对药物临床试验数据管理与统计分析的计划和报告工作的指导、规范,提 高统计学专业审评的效率和质量,国家食品药品监督管理总局组织制定了《药物临床试验数据管理与统 计分析的计划和报告指导原则》(国家食品药品监督管理总局通告 2016 年第 113 号), 自本通告 发布之目起执行。

2016年7月27日,为规范临床试验电子数据采集技术的应用,促进临床试验电子数据的真实性、完 整性、准确性和可靠性符合《药物临床试验质量管理规范》和数据管理工作相关规定的原则要求,国家 食品药品监督管理总局组织制定了《临床试验的电子数据采集技术指导原则》(国家食品药品监督管理 总局通告 2016 年 第 114 号), 自本通告发布之日起执行。

这三个文件填补了目前国内关于对临床数据管理具体操作的法规和技术规定的空白,对药物临 床试验的申办者,特别是对医药企业将产生较大的影响。如需进一步了解以上三个文件的具体内容 和相关解读,可随时和我们法律服务团队联系。

Please feel free to contact us if you have any further request.

有任何进一步疑问敬请随时和我们团队联系。

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