Comparison of regulatory framework of clinical trial with genetically modified organism-containing vaccines in the Europe, Australia, and Switzerland

New vaccines production and manufacture have revolutionized by recombinant technology. Various regulatory associations are engaged with the appraisal of a clinical trial with genetically modified organisms. At present safe, effective vaccines are needed in order to control the various emerging diseases which are a major cause of mortality. In reality, most vaccines raise biosafety worries with respect to human wellbeing. “Federal Office for Environment” is the competent authority for environmental risk assessments in Switzerland. Gene Technology Act 2000 is the fundamental direction that provides the necessary information to carry the clinical trials with genetically modified organism-containing vaccines. In addition, regulatory framework for “clinical trial with genetically modified organisms-containing vaccines” is stringent and partially harmonized in Switzerland, the European Union and Australia. In this study, we mainly concerned with regulatory aspects of “clinical trial with genetically modified organism” containing vaccine in three regions. This review includes various aspects like ethics, guidelines related to clinical trials of vaccines with genetically modified organisms.

Keywords: Clinical trial, Genetically modified organism, Vaccine, Regulatory status, Ethical approval

Introduction

Expanding knowledge of microbiology and innovative advancement has persistently extended the number and nature of vaccines accessible today. Vaccination has become one of the significant elements in maintaining and improving health globally, but its potential has not been reached. Creative arrangements like vectored, recombinant, nucleic acid-based, conjugate, somatic cell treatment vaccine come up with an improvement in the design of vaccination intended to carry new immunogenic material to host’s [1,2]. Invulnerable framework on genetically engineered (GE) vaccination can be produced by utilizing genetically modified organism (GMO) (Eg-By in vitro expression of recombinant genes which encode antigen protein but do not necessarily contain GMOs). Under “European Directive 2001/18/EC,” GMO is a creature, except for humans in which the genetic material has been altered in a way that does not generally occur by mating as well as characteristic recombination [3]. GMO-containing
vaccines include a recombinant microorganism, which conveys vaccine antigen into the human body [4]. Although genetically modified (GM) viruses also taken into consideration as GMO. In between 1990–2000, the clinical trials utilizing gene treatment innovation have fundamentally expanded, the number of registered GE vaccines has increased and continues to increase [5]. Regarding the clinical trial status of vaccines with GMO, only 5% of human GE vaccines appear to contain GMOs [6]. Although various GMO-containing vaccines are being developed, just a couple has arrived on the market until now (IMOIEV, Dengvaxia, Fluenza tetra) [7].

Vaccine development complies with the stringent regulatory requirement to ensure that safe, efficient, and excellent quality vaccines enter the marketplace. When it comes to risk/benefit assessment, little compromise can be made considering that most vaccines are given to healthy individuals and young children. Progressively strict regulatory prerequisite is one reason for the declining number of pharmaceutical companies that have been developing and distributing human vaccine since the 1950s [8,9].

GMO enactment of European Union (EU) ensures human wellbeing as well as prevents the environment from the introduction of potentially dangerous species which have been GM. At first, this enactment was created to control the presentation of GM plants and food items inside the EU. However, the definition of GMO also covers microorganism, so this enactment is likewise relevant for introducing GMO-based medicinal products. In Europe, three levels of review are required to direct a clinical trial with a therapeutic item comprising of GMO. Whereas on non-GMO medicinal products, only two levels of the examination are needed. In addition to the standard analysis of Clinical Trial Application (CTA) and approval by the ethics committee, a GMO-specific protocol involving an environmental and biosafety risk assessment for the release of GMOs is required [10].

An outline of gene therapy-clinical trials utilizing vectors and plasmid DNA has been previously published without differentiation between the purpose of non-vaccines and vaccines. Regulatory system and clinical trials for DNA–based and viral vectored vaccines containing GMO was checked in Europe, Switzerland, and Australia. A superior comprehension of the regulatory system and status of GMO-containing vaccine is required to assure the inventive vaccine’s future improvement. This paper outlines the regulatory system and clinical improvement in various three regions for the GMO-comprising vaccines.

Guidelines and regulatory framework of EU related to GMO-containing vaccines

A review of significant guidelines and rules regarding clinical trial with (GMO-containing) vaccine is given. The decision-making body is arising from the study that categorizes the different types of vaccines and distinguishes between GMO and non-GMO-containing vaccine legislation. The choice comes because of the investigation that categorizes the various kinds of vaccines; create a distinction between non-GMO and GMO-containing vaccine. Data concerning the procedure of the ethics committee was not considered. Various mandates like European guidelines and mandates concerning pharmacovigilance (Directive 2010/84/EU), European disease-specific, good manufacturing practices of investigational therapeutic products (Directive 2003/94/EC), and medicinal products for pediatric use (Regulation no., 1901/2006, Regulation no., 1902/2006) are not included from this review. The GMO-administrative necessities in Europe, which go beyond small-scale creatures’ biotechnologies, also incorporate plants; Food is caught under three primary mandates. The initial two identify with how the GMO-related action is performed: the “contained use mandate 2009/41/EC applies to any action where creatures are hereditarily altered or in which such GMOs are refined, put away, shipped, devastated, discarded or utilized in some other way, and for which explicit control measures are utilized to restrict their contact with, and to give an elevated level of security for the all-inclusive community and the environment [11]. “Deliberate Release Order 2001/18/EC” pertinent to any purposeful presentation to GMO or when no particular regulation measures are utilized to give a high level of security for the all-inclusive community. The 3rd mandate, “2000/54/EC” alludes to laborer’s security to the dangers identified with subjection to biological at the firm [12].

Phases of clinical trial and number of trials registered per year

On November 7, 2014, clinicalTrial.gov yielded more than 1,200 clinical projects. A significant number of trials did not fulfill incorporation criteria, and 234 trials were removed unquestionably. Fig. 1 shows the number of trials enrolled every year. The clinicalTrial.gov began enlistment in 1999. Along these lines, it incorporated the clinical trial, which had begun before 1999. From 2005, only 15–25 trials are enrolled every
year. Around 78.2% of all the computed tomography belongs to phase 1 stage 1/2 and 2 clinical trials make up 9.0% and 12.0% out of all, and stage 3 speak just 1.0% out of all trials (Fig. 1).

In Europe, a large portion of the clinical trials is carried (Table 1). Out of 234 clinical trials, most of the clinical trial was subjected to infection due to human immunodeficiency virus. The number of clinical trials with GMO vaccine utilized various viral vectors. The majority of GMO comprising of vaccines compared to the non–infectious disease by subjecting against the infectious disease. Fig. 1 shows the number of GMO-containing vaccines clinical trials using each viral vector type.

**Regulatory status in EU for GMO-containing vaccines**

The legal framework established by the EU assures GMOs’ improvement happens in a secured environment. A clinical trial, including a GMO-containing drug, must agree to the regulatory arrangements and legal framework of GMO and clinical trial.

The “EU Clinical Trial Regulation 536/2014 and the EU Clinical Trial Directive 2001/20/EC” expect to improve and fit the authorities’ arrangements administering clinical trial by
building up a transparent, straightforward methodology and making conditions helpful for effective coordination of clinical trials by the specialist’s guidance. A positive opinion from the morals committee and formal endorsement of CTA application are least required. The clinical trial directive and clinical trial regulation of the EU do not cover ecological and biosafety viewpoints. Accordingly, when a GMO containing the drug is included, then the clinical trial should agree to legislative arrangements on biosafety executing the contained use “Directive 2009/41/EC” and “Deliberate Release Directive 2001/18/EC” and “Directive 2000/54/EC” on the security of laborers (Regulation [EC] no., 1394/2007 of the European Parliament and of the Council of 13 November 2007 on Advanced therapy medicinal products and amending Directive 2001/83/EC and Regulation [EC] no., 726/2004 2004).

European GMO guidelines have been transposed into their relevant competent authority and national legislation appointed to review the GMO dossier, which the vaccine developers submit. The competent authorities can be federal, separate, or regional bodies and collaborate or work independently with the CTA request review. National legislation decides whether to apply the protocol of “restricted use” and “Deliberate release”. Before or simultaneously, along with the ethics committee and CTA, the GMO report analysis can be carried out.

For example, the categorization of current vaccines, DNA vaccine or viral vectored vaccine for gene treatment or against irresistible sicknesses, inside the extent of their applicable enactment can be seen as complicated exercise. Strangely, comprising of gene treatment restorative items and physical cell treatment therapeutic items fall under the meaning of advanced therapy medicinal item (and have their particular enactments) [13]. However, in case of immunization against an irresistible disease that uses a similar immunization (for example, DNA immunizations or viral/bacterial vectors) may not fall inside this scope and require separate mandates as well as guidelines.

Vaccines comprising of GMOs for use in clinical preliminaries in the EU need to conform to the various GMO-mandates like “deliberate release”, “contained use”, and “workers protection to biological agents”. Most nations demand either strategy dependent or a made to order assessment, for example, Belgium. A few nations similar to the United Kingdom consider clinical preliminaries with GMOs as “contained use”. While various nations, similar to Germany and Spain, for the most part, require the “intentional discharge” method. Despite the fact, it is an increasingly broad process including an explained natural hazard evaluation & the substance and configuration necessities to the intentional discharge method. These are blended crosswise over the EU nations through the institutionalized utilization of environmental risk assessment (ERA) and summary notification information format layouts. Fig. 2 represents the overview of European regulation, directive for the use of GMO containing vaccine clinical trials.

The growing European country has transposed these European directives on GMOs into its national legislation and selects a competent authority to review the GMO file submitted by the vaccine developer. Clinical trials involving GMOs in the United Kingdom may be controlled either under the deliberate or contained use system. This decision is made on a case-by-case basis by taking biological features and ERA into account. If the procedure to be followed is unclear, applicants may request guidance from regulatory authorities [14]. When the clinical trial is controlled as a deliberate release, then the deliberate release application file is sent to “Department for Environment Food and Rural Affairs”, and a public consultation is arranged. For contained use clinical trial, a notice must be sent to the Health and Safety Executive by the participating site in compliance with the GMO regulation on use [15]. In Germany, clinical trials with GMOs are controlled under deliberate release [16]. This technique involves the submission of ERA, a technical summary of GMO and other information like storage, handling and transport of vaccine to the Paul-Ehrlich Institute (PEI). The PEI issued the authorization after the GMO file has been submitted no later than 90 days. In Spain, GMOs’ clinical trials come within the scope of deliberate release legislation in compliance with Spanish law [17]. The biosafety report is forwarded to the “Ministry of Agriculture, Food and Environment” and should contain various documents like application type, technical report, and protocol. Clinical trials with GMOs in Belgium will fall under the “deliberate release or contained use framework” [18]. Sponsor may decide the protocol to follow by applying to scientific and technical advice.

**Guidance for GMO-vaccine in Australia**

“Gene Technology Act 2000 for a clinical trial in human involving GMOs” this direction gives fundamental data to associations in Australia wishing to lead human clinical prelimi-
naries, including a test item that is or contains a hereditarily altered living being (GMO). Administrative necessities are forced under the “Gene Technology Act 2000 (GT Act)” & “Gene Technology Regulations 2001,” which are directed by Gene Technology Regulator, statutory office holder and upheld by the “Office of the Gene Technology Regulator”. Managing a GMO without fitting authorization under the GT Act is an offence and subject to penalties [19].

Sponsors are advised to talk about their specific case with the Office of the Gene Technology Regulator (OGTR) until presenting an application to the regulator or continuing preliminary including GMO, which ensure that the proper authorization is granted. It is important to note that clinical preliminaries containing GMO and non-GMOs should likewise be led as per necessities of the “Therapeutic Goods Act” 1989, directed by the Therapeutic Goods Administration (TGA). Clinical preliminaries of remedial items, including vaccine which is under trial and being worked on, are oversight by a “Human Research Ethics Committee” and controlled through the “Clinical Trial Exemption” or the “Clinical Trial Notification”.

GM items that don’t contain live GMOs (refined recombinant protein)

Purified GM items that cannot cause infectious agents when placed into the host cells or do not contain live GMOs are not controlled under the GT Act. Clinical preliminary including such a GM item, no permit or other authorization from the regulator is required. Anyway, assembling a GM item from a live GMO in Australia is directed and approved under the GT Act. It is mandatory to contact the OGTR for direction for this kind of circumstances. The kind of approval required relies upon the GMO’s character and on its probable destiny once brought into the preliminary member [20].

Altered human somatic cells

When GMO is a changed substantial human cell or autologous cells, clinical preliminary may be named “exempt dealing” as per schedule 2 of the GT Regulations. To be excluded, the substantial cell must not be capable of creating infectious
agents because of the hereditary adjustment. Furthermore, if
the cell was changed utilizing a viral vector, the cell should
not contain infections liable to recombine with presented he-
reditary material, or the vector should never again be avail-
able in the cell.

According to the GT Act, Authorization from the Regulator
is not mandatory for excluded dealings; the main prerequi-
site is that they should not include purposeful arrival of
GMOs into the territory. Supporters may look for affirmation
from the OGTR that specific test item and convention meet
the prerequisites for an excluded dealing. If this is the situa-
tion, TGA may likewise require affirmation from OGTR be-
fore registration. If the changed physical cell does not meet
these conditions, at that point, a permit is required for the
clinical trial.

Clinical preliminaries including different sorts of GMOs

The permit from the regulator is mandatory for clinical pre-
liminary of some various kinds of GMO. Depend on GMO,
whether it is to be shed or discharged from preliminary
members, the classification of permit relies on. (For example,
practical GMOs liable to be shed in body liquids or excreta of
preliminary members, and accordingly discharged into na-
ture or if the GMOs liable to contained in the group of pre-
liminary members.)

“Dealing Not Including Intentional Release” (DNIR) permit
is required if the GMO is not probably going to be discharged
or shed. On the off “Dealing Involving Intentional Release”
(DIR) permit is required under that event, the reasonable
GMO can be discharged and transmitted/shed. If all else fails
about fitting classification, before setting up an application,
patrons should look for confirmation from OGTR. OGTR will
confirm the application type while screening the application
for the GMO. A mistakenly ordered license might be dis-
missed, or evaluation may be delayed when the candidate’s
explanation is required.

DNA vaccines

Under the GT Act, some DNA immunizations are avoided
from guideline, while others are most certainly not. As per GT
Act, it is rejected from guideline because the vaccines are in-
cluded stripped DNA (for example, the DNA is not covered in
lipid, protein or other structure) and are unequipped for of-
fering to ascend when it brought in to host cells.

To ensure that their specific test item will meet prerequi-
sites, patrons will look for affirmation from OGTR. The per-
mit from regulator is required for clinical trials. It will be de-
pendent upon guidelines of GT Act in a contest like if that
DNA immunization is not bare (for example, it is embodied
in nanoparticle lipid coat), on the off chance that if no irre-
sistible agents will produce, a DNIR permit is required. DIR
permit is required for an event like if the DNA immunization
can offer ascent to GM agents, which are infectious.

Getting a permit for GMO

In considering permit applications, the regulator must think
about candidate appropriateness. GT Act does not confine
who can apply for a permit. Commitment forces by the regu-
lator and GT Act permit holders accept certain obligations
and legitimate, so licenses are typically given to associations
working in Australia, such as colleges, medical clinics, or or-
ganizations. As per the GT Act, permit conditions additional-
ly needed permit holder to be authorized. On the other side,
if an association is not as of now certify, it is conceivable to
present an application for GMO permit and an application
for accreditation. Permit applications have to be supported
by an “Institutional Biosafety Committee (IBC)” preceding
being submitted to OGTR & “IBC” are typically connected to
authorize associations. When the submitting association
does not have its own IBC, an application can be embraced
by the IBC of another association. The IBC must have proper
specialized aggregates to audit the application [21].

Accreditation and Institutional Biosafety
Committees

Accreditation procedure helps the regulator evaluate if an as-
sociation has assets and inside procedures to empower the
viably manage work with GMOs. It will decide whether a can-
didate for a GMO permit is reasonable to hold a permit. IBCs
are required to contain a scope of reasonable specialists. In-
cluding GMOs regulation, IBCs give a quality confirmation
instrument, furnishing guidance to help associations with the
distinguishing proof and the executives of the dangers related
with GMO dealings. IBCs assess the satisfactory requirement
for modifiable low-risk dealings, and it does not require an
order thought by the regulator. In accreditation guidelines or
explanatory information on the guidelines for accreditation,
more data about accreditation and IBCs can be found. The appropriate authorization has to be taken under the Therapeutic Goods Act 1989 and Gene Technology Act 2000 before a clinical trial can proceed. Every approval process can run in parallel and as it is independent. Before clinical trial, GMO license can be submitted to OGTR along with getting approval from TGA and relevant Ethics Committee. Before being submitted to OGTR, GMO permit applications must be supported by an IBC. After the submission, applications are evaluated for fulfillment and might be dismissed if data is deficient. For DNIR applications, the regulator has 90 working days to settle on a choice from when the finished application is gotten. In some circumstances, the regulator demands additional data from the candidate, on which the regulator cannot continue. For DIR applications, the regulator has working days of 150, around eight months to choose from. If the regulator finds that the proposed dealings may present noteworthy dangers to individuals or application for DIR does not certify as “controlled & restricted discharge” in such case, a more drawn-out period will apply. The primary role of the IBCs is to do direct examinations to qualify as controlled and constrained and to determine whether the application is meeting propose fittings. Under the Gene Technology Act 2000, there is currently no expense related to applications.

Any exercises associated with GMOs can be performed in a proper physical control firm which the regulator confirms, but practically, it is not possible to conduct clinical trials in guaranteed physical containment. The regulator thinks about major aspects of the appraisal of permit applications and the appropriateness of proposed offices for clinical preliminaries. Usually, standard clinical or emergency clinical offices, licensed to the “National Safety and Quality Health Services” (NSQHS) Standards, are suitable for performing exercise related to GMO. While preparing a GMO license application, investigation of patient and prerequisites for an assortment containing the GMO should also be considered, and conditions related to license should be fulfilled, and this activity needs to be followed as per GT Act. In a GMO license application, for all activities involving GMOs, the proposed facilities’ nature should be described. As per the “National Pathology Accreditation, Advisory Council” or NSQHS Pathology to assist evaluation, any guidelines and relevant standards applicable to facilities must be included. Fig. 3. shows the overview of the approval process to grant a license for GMO.

Guidance for GMO-vaccine in Switzerland

During the most recent 25 years, scientific progress has brought about improved methods for developing and controlling cells for remedial or preventive intercessions. New gene transfer technologies enable genetic material to be introduced into somatic cells using specifically designed vectors, such as non-replicating viral vectors and DNA plasmids. Cell and gene treatment items are controlled comparatively to therapeutic items.

Clinical trials in Switzerland using GMO are performed since the mid-1990s. Until this point, 60 clinical preliminaries have been affirmed, and the pattern for new clinical preliminary applications is expanding. Other than nearby “Ethics Committees (EC), the Swiss Agency for Therapeutic Products (called Swiss medic) is the foremost administrative expert for endorsing gene and cell treatment clinical preliminaries in Switzerland. For gene treatment, preliminary clinical endorsements, several committees such as Swiss Expert Committee for Biosafety, the Federal office of Public Health, and the Federal Office for the Environment” are included as administrative experts in endorsement procedure according to preliminary clinical law [22]. Every preliminary clinical application is submitted after the EC and Swiss medic.

The opportunity to endorse a clinical preliminary after comprehensive clinical preliminary dossier accommodation is “30 days for investigational cell treatment items and 60 days for investigational gene therapy items.” “Swiss Therapeutic Act” (since January 2002; Federal Act of 15 December 2000 on Medicinal Products and Medical Devices [Therapeutical Products Act, TPA] SR812.2 2020) and its connected mandates provide the chief lawful guidelines for cell and gene treatment items at the degrees of clinical preliminaries and promote approval.

Regulatory framework

Additionally, a few different laws are taken to figure out in Switzerland. As per article 49 of Federal Law on the Transplantation of Organs, Tissues and Cells (Federal Act of 8 October 2004 on the Transplantation of Organs, Tissues and Cells [Transplantation Act] SR810.21) various articles in the TPA that manage the tissue-and organ-based items called transplant items (TpPs) and cell-based items. The “Human Research Act (HRA) and Its Ordinances” (in effect since Janu-
Fig. 3. Overview of approval process to grant license for genetically modified organism. DIR, Dealing Involving Intentional Release; DNIR, Dealing Not Including Intentional Release; RARMP, risk assessment and risk management plan.
Regulatory requirements for gene containing product clinical trial application

Specific administrative rules have been created over ongoing years due to the intricate idea of the gene by the “US Food and Drug Administration (FDA; Cellular & Gene Therapy Guidance) and the European Medicines Agency (EMA; Advanced Therapies Scientific Guidelines)” to help the improvement of gene items. Even though these direction reports are not legitimately official in Switzerland, the Swiss administrative specialists consider the EMA &FDA rules to get the detailing necessities for applying clinical trial, including quality treatment items and transplant products [26]. For clinical preliminaries, prerequisites have to be regularly discussed and adjusted dependent upon the situation. For this reason, Swiss medic offers the scientific guidance gatherings preceding filing in the preliminary clinical document. In addition to this, for clinical trial application for GMO-containing vaccines, few ClinO records (archives) must be submitted to Swiss medic [27]. The accompanying areas feature some administrative necessities regarding quality, non-clinical, clinical prerequisites for gene treatment items to submit the preliminary clinical document.

Quality consideration

GMP must deliver the investigational restorative item (IMP). The individual creation steps of IMP are generally not wholly approved for stage I/II clinical investigations.

In the preliminary clinical dossier, the vector’s remedial qualities and distinctive grouping components should be clarified, including the method of reasoning for its utilization. All development ventures during cloning and the inceptions and history of the arrangements should be portrayed in detail. Whichever choices markers can show the human subjects’ hazard ought to be evacuated in the final IMP. Utilized cells need to be described entirely during the amplification of IMP. The IMP should be steady all through its utilization in the casing of the clinical preliminary. In this way, the steadiness of the item should be tended to from the earliest starting point.

Nonclinical considerations

Nonclinical assessment of investigational gene therapy items means gathering significant data as for the (1) organic move-
ment, (2) potential shedding, (3) biodistribution profile, and (4) toxicological impacts as sufficient evaluation of this data ought to take into consideration potential dangers. The non-clinical assessments ought to be led with an item which fundamentally the same as attributes or with a proposed IMP [28].

Distributed information with practically identical items is viewed as vital information; be that as it may, they usually are not sufficient all alone to bolster the clinical utilization of the IMP ultimately. The nonclinical assessments ought to give sufficient data regarding a sheltered beginning portion, the ideal course of organization, and the dosing plan and “no observed adverse effect level” ought to be resolved concerning the beginning portion.

Clinical grade content should be used for key toxicological safety studies, and assessments should follow the standards outlined in ICH (M3), EMA (EMEA/CHMP/GTWP/125459/2006), or US FDA guidance (e.g., the direction archives “Pre-clinical Assessment of Investigational Cellular and Gene Therapy Products”).

Specific chances that should be tended to show by ex vivo gene therapy items in in vivo/in vitro settings. For carcinogenic changes cells transduced with lent viral/retro vectors should be evaluated. Area and number of incorporation destinations should be resolved, and the initiation of oncogenes near the combination locales should be examined.

Different dangers that ought to be assessed are the neurotic conduct of transduced cells. This might be particularly important for T cells transduced with specific T-cell receptors. The relocation, expansion, circulation, and any neurotic modification to particular organs should be examined at any rate one suitable creature animal varieties. The degree of examinations may rely upon current clinical involvement incomparable quality treatment IMPs.

Clinical considerations

The clinical assessments of investigational quality treatment items intend to decide security and efficacy. The clinical assessments must be performed by the GCP standards as portrayed in the ICH E6 (Rule for “Good Clinical Practice”) [23] and quality treatment IMP should be delivered by GMP. A clinical hazard appraisal should be submitted to Swiss medic based on the sign, clinical involvement in comparative investigational items, and the nonclinical wellbeing information. The degree of clinical observing and the requirement for “long-term-follow-up (LTFU)” studies ought to be found on the clinical involvement incomparable items and the non-clinical wellbeing assessment of clinical quality treatment IMP.

Given the vector type, clinical involvement in comparative IMPs, the clinical checking plan, and findings in nonclinical wellbeing need to be considered. For coordinating vectors, genome combination destinations and the potential for tumorigenicity should be intently checked. An LTFU plan is generally required, particularly for quality treatment items that will, in general, be communicated over quite a while period. The LTFU would already be a clinical convention, or a separate LTFU study could be planned and submitted for endorsement. Any solemn antagonistic occasions that happen at the edge of a clinical preliminary with gene treatment, IMP should be accounted for Swiss medic as per the ClinO, and agendas should be distributed on the Swiss medic site.

Regulatory framework for GMO-containing vaccine for marketing authorization

The advertising approval for gene products requires the accommodation of a comprehensive dossier that must be organized into five modules as indicated by the “ICH Common Technical Document (CTD) M4 titled Organization of the CTD for the Registration of Pharmaceuticals for Human Use”
[29]. Module 1 needs to consist of the GMP certificate and actual application, data in regards to the condition of any approvals in different nations, data identifying with specialists (counting educational plan vitae), a hazard evaluation of the natural information, pharmacovigilance, and hazard the executive’s plans, marking data, tolerant data, and expert data. In Switzerland, since the 1990s, substantial expertise in the control of gene therapy has been accumulating. The perspective of sponsor and regulatory perspective and investigators clinical trial application process is positive [30,31]. The meeting related to scientific advice is the central gateway for sufficient clinical trial planning in Switzerland and developing a safe and effective gene product. Table 2 represents a comparison between the EU, Australia, and Switzerland.

### Conclusion

This study gives a comprehensive idea about the present regulatory scenario regarding GMO-containing vaccines in various countries like Switzerland, Australia, and the EU. The study provides a difference between recent views of the clinical trial, the regulatory pathway of the marketing of vaccines. It is necessary to decrease the burden of regulation to bring the harmonization procedure in Australia, Switzerland, and the EU. Stringent harmonized guidelines have to come for the betterment of clinical trials with GMO-containing vaccines.

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### Table 2. Comparison between EU, Australia, and Switzerland

| No. | Parameters                        | EU                          | Switzerland               | Australia                  |
|-----|-----------------------------------|-----------------------------|---------------------------|----------------------------|
| 1   | Regulatory authority              | European Medicine Agency    | Swiss medic               | Therapeutic goods administration |
| 2   | Applicability of clinical trial regulations | Applicable to EU but each member state has its own direction | Only in Switzerland | Only in Australia |
| 3   | Status of clinical trial          | More than 147 number of clinical trials were conducted | About 60 clinical trials were conducted | Very a smaller number of trials was conducted |
| 4   | Guidance                          | CBER sanctioned guidance    | As per Swiss Agency for Therapeutic Products | OGTR guidance |
| 5   | Mandatory applications to begin clinical trial | IND | CTA | DNIR or DIR required. |
| 6   | Regulatory guidance imposed under | EU directive and regulation | Article 49 of Federal Law, other Law, and Ordinance | Gene Technology Act 2000 and GT Regulation 2001 |
| 7   | Ethics committee                  | HREC Committee is responsible | Relevant Ethics Committee | Relevant Ethics Committee |
| 8   | Mandatory to attain               | GCP guideline               | GCP guidelines, ClinO ordinance | GCP guidelines |
| 9   | Guideline status                  | Very stringent guidelines   | Stringent guidelines      | Not strict as much as EU |

EU, European Union; CBER, Center for Biologics Evaluation and Research; OGTR, Office of the Gene Technology Regulator; IND, Investigational New Drug; CTA, Clinical Trial Application; DNIR, Dealing Not Including Intentional Release; DIR, Dealing Involving Intentional Release; GT, Gene Technology; HREC, Human Research Ethics Committee; GCP, good clinical practice; ClinO, Clinical Trials Ordinance.
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