NATIONAL REGULATIONS
France

1. Requirement for JACIE

In France, JACIE accreditation is not legally required to perform allogeneic or autologous stem cell transplantation. However, engagement in the accreditation process or obtaining JACIE certification is considered one of the criteria when renewing authorization for these clinical programs.

Many French medical centers seek this accreditation to demonstrate their commitment to high-quality care and adherence to international standards. While JACIE accreditation is not mandatory for CAR T-cell therapies, it is required by pharmaceutical companies when using CAR T cells under Marketing Authorization.

02. Authorisation and licencing

B1.3.1, CM1.3.1, C1.3.1, D1.2.1

Clinical Units

Governmental authority that registers, authorises or certifies:

Agence Régionale de Santé (Regional Health Agencies) and Haute Autorité de Santé (High Authory for Heath)

Document that demonstrates that the unit complies with the national laws and regulations:

Autorisation d'Activité de Soins
Issued by the Agence Régionale de Santé (ARS), this document authorizes clinical units to perform stem cell transplants. It confirms that the unit meets the regulatory standards for quality and safety in the provision of care.

Bone marrow collection units

Governmental authority that registers, authorises or certifies:

Agence de la Biomédecine (Biomedicine Agency) and Agence Régionale de Santé (Regional Health Agencies)

Document that demonstrates that the unit complies with the national laws and regulations:

Autorisation de Prélèvement de Moelle Osseuse. This authorization, also issued by the Agence Régionale de Santé (ARS), permits a center to collect bone marrow. It demonstrates compliance with legal and safety regulations concerning the collection of human tissues.

Apheresis Collection units

Governmental authority that registers, authorises or certifies:

Agence de la Biomédecine (Biomedicine Agency) and Etablissement Français du Sang (French Blood Establishment)

Document that demonstrates that the unit complies with the national laws and regulations:

Autorisation de Prélèvement par Aphérèse. Similarly, this authorization from the ARS confirms that the center complies with the national standards for collecting hematopoietic stem cells via apheresis. It ensures the collection meets the requirements for donor and patient safety.

Processing units

Governmental authority that registers, authorises or certifies:

Agence de la Biomédecine (Biomedicine Agency) and Agence Nationale de Sécurité du Médicament et des Produits de Santé (National Agency for the Safety of Medicines and Health)

Document that demonstrates that the unit complies with the national laws and regulations:

Autorisation de Préparation de Produits de Thérapie Cellulaire
Issued by the Agence Nationale de Sécurité du Médicament et des Produits de Santé (ANSM), this license certifies that cell processing laboratories comply with Good Manufacturing Practices (GMP) and other relevant regulatory standards for processing cellular therapies.

03. cGxP training requirements

CM3.3.4
C4.4.2.5
D4.4.2.5

The National law does not specify requirements for GxP training.

In France, national regulations require personnel involved in the collection, processing, and administration of cellular therapies, including stem cell transplantation, to receive regular ongoing training in current Good Manufacturing Practices (GMP). This ensures that staff remain proficient in the latest standards and procedures, maintaining high-quality and safe practices in the field. The Agence Nationale de Sécurité du Médicament et des Produits de Santé (ANSM) oversees the enforcement of these regulations, which emphasize continuous education and training.
In the context of cell processing or manufacturing cellular therapies (such as CAR-T or stem cells), GMP certification renewal every 3 years may be required. This is crucial for maintaining the quality and safety of biological products and for meeting the regulatory expectations of the ANSM. Although the regulations do not specify an annual training frequency, many institutions implement yearly training programs to ensure compliance with the latest GMP standards, aligning with both national and international requirements.

04. Physicians' licensing / qualifications

B3.1.1, B3.2.1 CM3.1.1 , C3.2.1, D3.2.1

In France, physicians can demonstrate their specilist certification or training in the following ways:

Diplôme d'Études Spécialisées (DES): This is the primary postgraduate diploma awarded after completing specialized medical training in fields such as Hematology, Medical Oncology, Immunology, or Pediatric Hematology/Oncology. The DES certifies that a physician has undergone the requisite training and has achieved specialist status in their chosen field.

Experience Documentation: Physicians can also provide documentation of their extensive experience in the field through professional records, publications, and endorsements from recognized medical institutions or from the Department Chief. For instance, physicians who completed their training before the establishment of formal specialty certifications with over ten years of experience in hematopoietic progenitor cell (HPC) transplantation can serve as a Clinical Program Director, as per JACIE standards.

Registration with the Conseil National de l'Ordre des Médecins (CNOM): Specialist physicians must be registered with the CNOM, the French Medical Council. This registration includes recognition of their specialty and is a legal requirement to practice medicine in France. The CNOM maintains a public register where patients and institutions can verify a physician's qualifications and specialties.

Attestation de Formation Spécialisée Approfondie (AFSA): For certain subspecialties or advanced training, physicians may obtain an AFSA, which attests to additional specialized training beyond the DES. This certification is recognized by medical institutions and the CNOM.

By presenting these credentials, physicians in France can demonstrate their specialist certification or training, aligning with JACIE requirements for roles such as Clinical Programme Director

05. Consent from minor donors

B6.2.6

TThe law imposes stringent requirements for obtaining informed consent from minor donors in the context of organ or tissue donation.

Specifically, for a minor to donate, the following conditions must be met:

1. Parental or Guardian Consent: The minor's legal representatives—typically the parents or legal guardians—must provide informed consent for the donation.
2. Judicial Authorization: Beyond parental consent, authorization from a judicial authority is mandatory. This involves obtaining approval from the President of the Tribunal de Grande Instance or a designated magistrate. The judicial authority ensures that the donation is in the best interest of the minor and that all legal and ethical considerations are thoroughly evaluated.

These dual layers of consent—parental or guardian approval coupled with judicial authorization—are designed to protect the rights and well-being of minor donors, ensuring that the decision is made with full consideration of the minor's best interests

06. Laboratory testing of all donors including autologous

B6.3.6

The relevant authorities for registering, authorizing, or certifying laboratories for donor testing are:

Agence Nationale de Sécurité du Médicament et des Produits de Santé (ANSM)

- **Role:** ANSM is responsible for overseeing the safety and regulation of medical devices, biological products, and cell therapies in France.
- **Regulation:** The ANSM ensures that laboratories conducting tests related to donor eligibility, particularly for stem cell transplants or hematopoietic progenitor cells (HPC), comply with Good Laboratory Practice (GLP) standards and other applicable regulations.

Haute Autorité de Santé (HAS)

- **Role:** HAS provides certifications and accreditations for healthcare institutions, including laboratories that conduct medical testing for donor suitability.
- **Regulation:** The HAS ensures that laboratories meet the national health standards in the provision of medical services, including testing for the safety and compatibility of donors.

Laboratoire d'Analyse Médicale (Medical testing laboratories)

- **Role:** These laboratories must also be certified by the Comité Français d'Accréditation (COFRAC), which is the French accreditation body for testing and calibration laboratories.
- **Regulation:** COFRAC ensures that the laboratories performing donor testing meet the required international standards, such as ISO/IEC 17025, for the competence of testing and calibration laboratories

Agence de Biomédicine (ABM)

- **Role:** This agency is specifically responsible for regulating activities related to human tissues and cells, including those used for stem cell transplantation.
- **Regulation:** The ABM oversees the regulatory compliance of laboratories performing testing for donor selection and suitability in accordance with French law

07. Additional testing for allogeneic HPC donors

B6.4.9

	Testing required	Risk assessment require	None
Human immunodeficiency virus, type 1	✓		
Human immunodeficiency virus, type 2	✓		
Hepatitis B virus	✓		
Hepatitis C virus	✓		
Treponema pallidum (syphilis)	✓		
Human T cell lymphotropic virus I	✓		
Human T cell lymphotropic virus II	✓		
West Nile Virus		✓	
Trypanosoma cruzi (Chagas' Disease)		✓	

Additional comments

Testing is also routinely conducted for CMV, EBV, and toxoplasmosis. Risk assessment is performed for tuberculosis, Hepatitis E, malaria, Zika virus, Hantavirus, and Covid-19

08. Product labelling and coding system

D7.1.2, C7.1.2, CM7.1.2

ISBT128 is used in Collection and Processing facilities. A few centres, particularly JACIE accredited centres involved in collection and processing within the Etablissement Français du Sang, also use the Single European Code (SEC)

09. Approval of Investigational treatment protocols & patient consent forms

B8.1, B8.2

To demonstrate compliance with applicable French laws and regulations for investigational treatment protocols and clinical research, a center in France would need to have the following key documents:

1. Authorization from the French National Agency for Medicines and Health Products (ANSM)

- Document Type: Authorization Letter or Approval Certificate
- Description: This document demonstrates that the clinical program or investigational treatment protocol has been reviewed and authorized by ANSM, which ensures that the treatment complies with national safety, efficacy, and regulatory standards.

2. Ethics Committee Approval

- Document Type: Approval or Opinion Letter from an Ethics Committee (Comité de Protection des Personnes, CPP)
- Description: In France, all clinical research protocols involving human participants must be reviewed and approved by an Ethics Committee (CPP). The committee evaluates the ethical aspects of the protocol, including patient consent, safety, and potential risks.

3. Clinical Trial Agreement (CTA) or Contract

- Document Type: Clinical Trial Agreement (CTA)
- Description: This document formalizes the terms and conditions between the institution and the sponsor of the clinical trial. It ensures compliance with regulatory requirements and institutional policies regarding the conduct of the trial, treatment, and patient involvement.

4. Good Clinical Practice (GCP) Certification

- Document Type: GCP Certificate or Compliance Documentation
- Description: Centers must adhere to Good Clinical Practice (GCP) guidelines. This certificate verifies that the center follows GCP standards in conducting clinical trials, ensuring that the protocols and patient consent forms comply with ethical and legal regulations.

5. Investigator's Brochure or Clinical Research Protocol

- Document Type: Investigator's Brochure (IB) or Protocol Document
- Description: This document includes the full details of the clinical research protocol, treatment plan, and patient consent form. It must be approved by the ethics committee and the relevant regulatory authorities to ensure it aligns with French laws and regulations.

6. Patient Consent Documentation

- Document Type: Patient Informed Consent Form (ICF)
- Description: The informed consent form, reviewed and approved under applicable law, is required for all clinical trials. It must ensure that patients are fully informed of the risks, benefits, and procedures involved in the clinical study, and that consent is obtained in a legally compliant manner.

7. INSERM (National Institute of Health and Medical Research) Approval (if applicable)

- Document Type: INSERM Review Approval
- Description: For clinical research programs that are associated with public institutions or involve national research programs, INSERM may provide additional oversight and approval.

These documents collectively demonstrate that a clinical program is in compliance with the applicable laws and regulations in France regarding investigational treatment protocols and clinical research activities.

10. Distribution before completion of donor eligibility

D7.4.7, C7.4.7, CM7.4.6

The law in France does not allow products to be distributed prior to completion of donor eligibility except in very exceptional and urgent circumstances.

French Public Health Code (Code de la santé publique)

- Strict requirements are in place for donor eligibility in cellular and tissue therapies.
- Article L.1241-1 mandates that donor eligibility must be confirmed before the distribution or use of biological materials (including stem cells and tissues) for clinical purposes.

Agence Nationale de Sécurité du Médicament et des Produits de Santé (ANSM) Guidelines

- The ANSM enforces these requirements to ensure compliance with national laws.
- Products cannot be distributed or used before donor eligibility is fully documented and confirmed.

Exception for Urgent medical need:

- Under very specific circumstances (e.g., urgent medical need for the patient), products may be distributed before completion of donor eligibility determination
- In such cases, comprehensive documentation and a risk assessment are required
- The treating physician must be informed of the pending eligibility results

The distribution of cellular therapy products before completing donor eligibility determination is **generally prohibited** to ensure patient safety and product quality. However, in **exceptional and urgent situations** where delaying treatment could pose a significant risk to the patient, French regulations may permit the use of such products under strict conditions.

In these exceptional cases, comprehensive documentation is required, including the rationale for expedited use, and the treating physician must be informed of the pending donor eligibility results. With an appropriate risk assessment, including a risk-benefit assessment related to the patient's treatment, the cells may be released under the responsibility of the designated person before specific test results are available. This approach aligns with JACIE Standard D7.4.7, which allows for distribution before donor eligibility completion under specific circumstances, provided that proper documentation and communication are maintained.

11. Biohazard and warning labels

D7.4.4.1/C7.4.4.1/ CM7.4.3.1

	Required [by law]	Not allowed [by law]
Biohazard label	✓	
Statement "NOT EVALUATED FOR INFECTIOUS SUBSTANCES"		
Statement "WARNING: Advise Patient of Communicable Disease Risks"	✓	
Statement "WARNING: Reactive TestResults for [name of disease agent or disease]	✓	