



The EFGCP Report on  
The Procedure for the Ethical Review of Protocols  
for Clinical Research Projects in Europe  
(Update: March 2008)

Bulgaria

1. What laws or regulations apply to an application for conducting a clinical trial in Bulgaria?

Bulgarian Drug Law – Law on drugs and pharmacies in human medicine.  
Regulation 14 of 31 July 2000 on conditions and the procedures for conducting clinical trials with drugs on human subjects.

2. Which government, legal or authoritative body or bodies is or are responsible for the establishment and/or accreditation of (research) ethics committees for reviewing clinical trials for investigational medicinal products, their supervision and quality? Are there different (research) ethics committees reviewing other projects?

Trials on medicinal products and devices are regulated by the above mentioned regulations.

The Bulgarian Health Law regulates other biomedical research.

The Law on Higher Education in Bulgaria regulates research that is part of educational activity.

3. What is the process for achieving clinical trial authorisation from the competent authority in Bulgaria?

An application form is submitted to the competent authority, accompanied by the required documentation. Initial validation of the application is carried out at the Bulgarian Drug Agency. If deficiencies are noted a deficiency letter is sent to the applicant – usually in about 10 days. The review period stops with the issue of a deficiency letter. If there are no deficiencies, or after deficiencies are cleared, the documentation is transferred to the Specialized Committee for Authorization of Performance of Clinical Trials (SCAPCT). The SCAPCT assesses the protocol and accompanying documentation and issues a decision – Authorization to perform a clinical trial.

The committee can request amendments to the protocol or supporting documentation as a condition of issuing an authorization. The authorization decision is issued in as many copies as there are trial sites and they are transferred to the sites. From that moment on the trial can proceed.

4. What is the process for obtaining ethical review of a clinical trial protocol by a competent (research) ethics committee in Bulgaria?

The Bulgarian Drug Agency is the responsible body for accreditation and oversight of ethics committees in Bulgaria. All trials are approved by the local ethics committee at the trial site, regardless of the specificity of the trial.

5. Is there a single organisation to which to apply for ethical review of a clinical trial for an investigational medicinal product, regardless of whether this is for a single site or multiple sites?

No, except that the Specialized Committee for Authorization of Performance of Clinical Trials achieves a single opinion through the final approval of all trials.

6. What is the website for the organisation that issues guidelines on the ethical review of a clinical trial for an investigational medicinal product?

<http://www.bda.bg/?lang=en>

The website of the Bulgarian Drug Agency, in English.

7. Is there a procedural interaction between the national or local competent authority and the (research) ethics committee during the approval process?

No.

8. Does the application to the EC and to the competent authority have to be submitted in parallel, or, if not, in which order?

In parallel.

9. How many (research) ethics committees are there in Bulgaria?

Currently there are 103 approved ethics committees that can give opinion on trials to be performed at the specific site.

10. How are ECs funded in Bulgaria? Do they charge fees? If yes what is their scale of fees?

Ethics Committees are funded by their local fees. Fees range around 500-1 200 BNG (250-600 Euro).

11. Who is responsible for submitting the request for ethical review to the competent ethics committee for single-site and for multi-site clinical trials?

The request to the local ethics committee is submitted by the principal investigator at the trial site. For multi-center trials the submission is made by the coordinating investigator for Bulgarian sites.

12. How is a "single opinion" achieved for multi-site studies?

The Specialized Committee for Authorization of Performance of Clinical Trials achieves a single opinion through the final approval of all trials.

13. How many members serve on an EC?

The number varies depending on local decisions – at the discretion of the executive director of the health establishment to be the trial site. They are in any case no less than 7. Usually are 8-10 members.

14. How many members constitute a quorum?

Two thirds of the officially appointed members attending constitute a quorum.

15. How are EC members appointed?

Members of the Local Ethics Committee are appointed by the executive director of the health establishment, which is to be the trial site.

16. How is the independence of members ensured?

Members are obliged to declare conflict of interest at every meeting and abstain from voting.

17. How are conflicts of interest of EC members avoided?

Members are obliged to declare conflict of interest at every meeting and abstain from voting.

18. What backgrounds and/or qualifications of members are actively sought?

The qualifications of the ethics committee members are at the discretion of the executive director of the hospital. Usually there are specialists in internal diseases, clinical pharmacology (where available), clinical laboratory, surgery.

19. How do ECs obtain specialist expertise?

The ethics committee can attract external experts when needed.

20. What are the training requirements for members of ECs?

There are no specific training requirements that are laid down in legislation. There is general requirement that as a group they have competence in the clinical fields and GCP.

21. What training programmes are available for EC members in Bulgaria?

Training courses in GCP organized by the Association for Good Clinical Practice and Research Development and the Bulgarian Association for Clinical Research.

22. What are the timelines for the assessment of single- and multi-site studies?

The timeline for the ethics committee is 30 days. The timeline for the final competent authority authorization is 60 days.

23. How are substantial amendments submitted during the review process dealt with?

Substantial amendments are forwarded to the expert that makes the assessment and the amendment is approved within the initial approval decision.

24. How does an EC assess the suitability of investigators and of sites?

There is a formal requirement for the PI to have two years clinical experience after having obtained a specialist degree in the field of research. The suitability of the site is assessed based on the requirements of the protocol and the available equipment at the site.

25. How are the requirements for (research) ethics committees to review the contractual or financial arrangements in clinical trials for both investigators and hospitals handled?

Contracts are submitted and reviewed within the total application package.

26. How are the requirements for ethics committees to review the compensation arrangements for study subjects handled?

Information about compensation to study subjects is submitted and reviewed within the total application package.

27. Is there an ongoing quality assurance process (e.g. audits, inspections, internal SOP) for (research) ethics committees in Bulgaria?

The process is not ongoing currently, but there was such process in the years up to 2006. With update of pharmaceutical legislation most likely the ethics committee audits will be resumed.

28. Is there an appeal mechanism?

Yes. Appeals are sent to a Central Ethics Committee, which reviews the grounds for appeal.

29. How do ECs deal with SUSAR reports and Annual Safety Reports?

SUSARs and ASRs are reviewed by responsible expert and reported at the regular Ethics Committee meetings.

30. How are 'substantial amendments' defined?

As defined in Directive 2001/20 "Amendments likely to have an impact on the safety of the trial subjects or to change the interpretation of the scientific documents in support of the conduct of the trial".

31. What are the indemnity insurance requirements for research projects?

There are no specific requirements for such cover. The suitability is assessed on a case by case basis.

32. What are the indemnity insurance requirements for ethics committee members themselves?

There is no cover for the liability of the ethics committee.

33. How is informed consent obtained from vulnerable subjects who are potentially to be involved in a clinical trial?

There are detailed requirements for each group of vulnerable subjects. Consent is obtained from the legal representative, relatives or the subjects themselves (depending on their level of understanding).

34. How do ECs assess the progress and outcome of research projects that they have approved?

The ethics committee requires investigators to submit annual progress reports. They are reviewed by the responsible expert for the project and reported to the committee at a regular meeting.

35. How does the EC ensure reception of the Annual Safety Report and the Summary of the Final Report of a research project that it has approved?

Submission of final report and annual progress report is an official requirement to the investigator. These requirements are additionally outlined in the text of the approval decision.

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