

EMA's new 3RsWP

3Rs Working Party Annual Stakeholders Meeting – Public session

Outline



Drivers for 3Rs

- EMA's commitment to 3Rs historical perspective
- Introducing the new 3RsWP
- ... and its ambitious 3Rs Workplan
- Take home messages
- Time for your thoughts SLIDO

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Animal experimentation in Europe – regulatory use



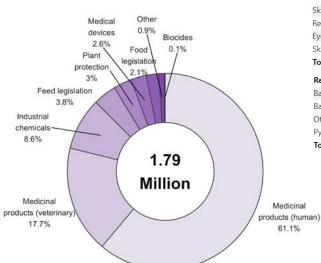
HMPs

Regulatory uses: Toxicity	Number of uses	Percentage
Repeated dose toxicity	83960	26.749
Kinetics	53884	17.169
Neurotoxicity	401	0.139
Target animal safety	56	0.029
Developmental toxicity	26498	8.449
Pharmaco-dynamics (incl safety pharmacology)	75163	23.949
Other toxicity/safety testing	4737	1.519
Reproductive toxicity	20925	6.669
Genotoxicity	6341	2.029
Acute and sub-acute	16151	5.149
Ecotoxicity	15383	4.909
Carcinogenicity	4991	1.599
Skin sensitisation	4637	1.489
Phototoxicity	414	0.139
Skin irritation/corrosion	203	0.069
Safety testing in food and feed area	148	0.059
Eye irritation/corrosion	91	0.039
Total	313983	100,009
Regulatory uses: Quality control	Number of uses	Percentage
Pyrogenicity testing	28763	4.02%
Batch safety testing	97318	13.60%
Batch potency testing	563989	78.81%
Other quality controls	25582	3.57%
Total	715652	100,00%

* 10,4 million animals in 28 Member States incl Norway (2019)

Publicly accessible ALURES Statistical EU Database on animal use

https://ec.europa.eu/environment/chemicals/lab animals/alures en.htm



VMPs

Regulatory uses: Toxicity	Number of uses	Percentage
Target animal safety	3454	7.93%
Acute and sub-acute	25813	59.27%
Ecotoxicity	885	2.03%
Kinetics	3219	7.39%
Safety testing in food and feed area	544	1.25%
Developmental toxicity	455	1.04%
Other toxicity/safety testing	3991	9.16%
Pharmaco-dynamics (incl safety pharmacology)	884	2.03%
Repeated dose toxicity	708	1.63%
Genotoxicity	126	0.29%
Skin sensitisation	659	1.51%
Reproductive toxicity	2808	6.45%
Eye irritation/corrosion	3	0.01%
Skin irritation/corrosion	3	0.01%
Total	43552	100,00%
Regulatory uses: Quality control	Number of uses	Percentage TI
Batch potency testing	180657	75.01%
Batch safety testing	53371	22.16%
Other quality controls	6684	2.78%
Pyrogenicity testing	141	0.06%
Total	240853	100,00%



of 22 September 2010 on the protection of animals used for scientific purposes

Article 4 clearly states that:

Member States shall ensure that, wherever possible, a scientifically satisfactory method or testing strategy, not entailing the use of live animals, shall be used instead of a procedure.

Member States shall ensure that the number of animals used in projects is reduced to a minimum without compromising the objectives of the project.

Member States shall ensure refinement of breeding, accommodation and care, and of methods used in procedures, eliminating or reducing to the minimum any possible pain, suffering, distress or lasting harm to the animals.

Article 13 states that:

- 1. Without prejudice to national legislation prohibiting certain types of methods, Member States shall ensure that a procedure is not carried out if another method or testing strategy for obtaining the result sought, not entailing the use of a live animal, is recognised under the legislation of the Union.
- 2. In choosing between procedures, those which to the greatest extent meet the following requirements shall be selected:
 - (a) use the minimum number of animals;
 - (b) involve animals with the lowest capacity to experience pain, suffering, distress or lasting harm;
 - (c) cause the least pain, suffering, distress or lasting harm;
 - and are most likely to provide satisfactory results.



European Parliament

2019-2024

TEXTS ADOPTED

P9 TA(2021)0387

Plans and actions to accelerate a transition to innovation without the use of animals in research, regulatory testing and education

European Parliament resolution of 16 September 2021 on plans and actions to accelerate the transition to innovation without the use of animals in research, regulatory testing and education (2021/2784(RSP))

mals used for scientific purposes

scientifically satisfactory method or testing strategy, not a procedure.

nals used in projects is reduced to a minimum without

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European Parliament

2019-2024



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P9_TA(2021)0387

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10/02/2022

Follow-up to the European Parliament non-legislative resolution on plans and actions to accelerate a transition to innovation without the use of animals in research, regulatory testing and education ¶

- 1. → Resolution tabled pursuant to Rules 132(2) and (4) of the European Parliament's Rules of procedure ¶
- 2. → Reference number: 2021/2784 (RSP)·/·RC9-0425/2021·/·P9_TA-PROV(2021)0387¶
- Date of adoption of the resolution: 16 · September · 2021¶
- 4. → Competent Parliamentary Committee: N.A.¶

https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2021/2784(RSP)&l=en&mccid=687873d92e&mceid=dba5dcb0dc



10/02/2022

European Parliament

2019-2024



Increased efficiency of assessing

TEXTS ADOPTED

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Data and knowledge sharing: PARERE and other mechanisms

One substance – One assessment, see

'ONE – Health, Environment, Society -Conference', June 2022 Brussels

3Rs in R&D of medicines EMA and 3Rs

substances by grouping

ALURES statistical database and open-access database rules of procedure on non-technical summaries of authorised projects

IMI and H2020/Horizon Europe and European **Research Council**

EURL-ECVAM reviews on NAMs in biomedical research

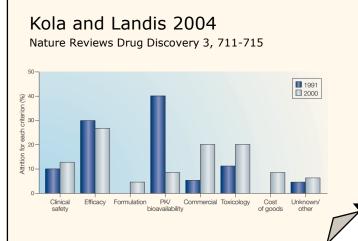
Training programmes on 3Rs

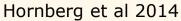
tary Com EPAA as means for collaboration

https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?reference=2021/2784(RSP)&l=en&mc cid=687873d92e&mc_eid=dba5dcb0dc

Reducing drug attrition through better prediction



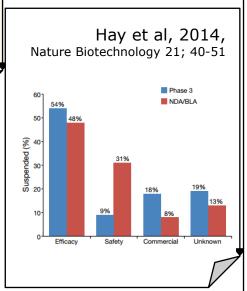


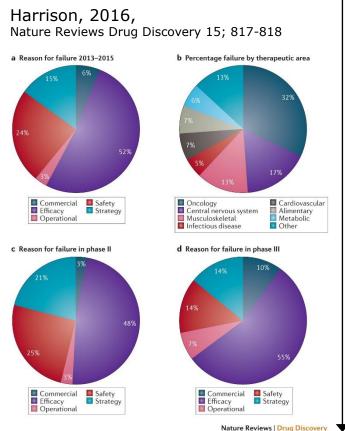


Drug Discovery Today 19; 1131-1136

Most noted safety reasons for withdrawal of marketed drugs:

- Liver toxicity
- Cardiovascular toxicity
- CNS effects





Outline



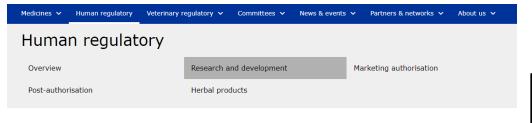
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EMA's commitments to the 3Rs(1/2)





Adaptive pathways

Advanced therapies

Clinical trials

Compassionate use

Compliance

Data on medicines (ISO IDMP standards)

Ethical use of animals

Innovation in medicines

Medicines for older people

Orphan designation

Paediatric medicines

Pharmacovigilance

DDIME: priority modicin

Ethical use of animals in medicine testing

Table of contents

- · 3Rs principles
- EMA role
- . EMA actions on 3Rs in 2016-17
- · Scientific guidelines
- · Veterinary medicine testing outside the EU
- Recommendations on 3Rs in European Pharmacopoeia

This content applies to human and veterinary medicines

The European Medicines Agency (EMA) supports the implementation of the so-called 3Rs principles - replace, reduce and refine - for the ethical use of animals in medicine testing across the European Union (EU). These principles encourage alternatives to the use of animals in the testing of medicines while safeguarding scientific quality and improving animal welfare where the use of animals cannot be avoided.

Directive 2010/63/EU ☑ requires <u>marketing authorisation holders</u> to integrate the 3Rs and welfare standards for the treatment of animals in all aspects of the development, manufacture and testing of medicines.

The Directive aims to **protect animals** in scientific research, with the final aim of replacing all animal research with non-animal methods.



23 September 2011 EMA/470807/2011 Veterinary Medicines and Product Data Management

Statement of the EMA position on the application of the 3Rs (replacement, reduction and refinement) in the regulatory testing of human and veterinary medicinal products

The European Medicines Agency (EMA) commits to the application of replacement, reduction and refinement (the 3Rs) of animal testing as detailed in Directive 2010/63/EU¹. To this end, a Joint ad hoc Expert Group (the JEG 3Rs) has been created in order to promote best practice in the implementation of the 3Rs in regulatory testing of medicinal products and to facilitate full and active cooperation with other European groups working in the 3Rs area.

While significant progress has been made in relation to regulatory testing involving animals it remains the case that certain types of data can only be generated by means of animal studies. Where such studies are needed they should be selected and conducted in strict adherence to the 38r principles.

As a European body with responsibility for developing harmonised European regulatory requirements for human and veterinary medicinal products the EMA has and will continue to play a key role in eliminating repetitious and unnecessary animal testing in the European Economic Area (EEA), in collaboration with other European organisations such as EDQM. Through its active participation and collaboration in the work of other multinational organisations such as the ICH and the VICH, the EMA contributes to the application of the 3Rs in the development of globally harmonised requirements, the implementation of which contributes to the elimination of unnecessary animal testing.

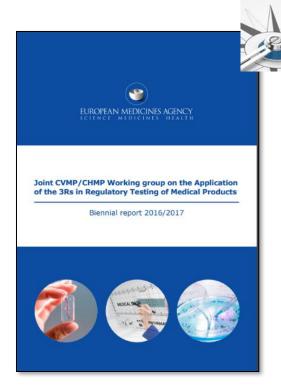
https://www.ema.europa.eu/en/human-regulatory/research-development/ethical-use-animals-medicine-testing

EMA's commitments to the 3Rs (2/2)



First joint CVMP/CHMP working group on the 3Rs in 2010





Achievements of the JEG3Rs & J3RsWG (1/2)



Setting up a regulatory framework to foster uptake of 3R testing approaches

- Guideline on basic principles of regulatory acceptance of NAMs/3Rs for testing of HMPs and VMPs
- Guidance for individual laboratories for transfer of 3R quality control methods validated in collaborative trials
- Review and update of EMA and (V)ICH guidelines to implement 3Rs best practices
- Position statement on the ethical use of animals in the development, manufacture and testing of VMPs

Batch Release testing

- Review of final product batch testing requirements with specific recommendations to MAHs
- Recommendation to MAHs to ensure compliance with 3Rs methods described in the European Pharmacopoeia
- Recommendation to MAHs highlighting recent 3Rs methods described in the European Pharmacopoeia
- Training for assessors

Collaboration with EC, EDQM, EURL-ECVAM, other EU agencies and international organisations (e.g. Vac2Vac)

Achievements of the JEG3Rs & J3RsWG (2/2)



Review of regulatory testing requirements / 3Rs



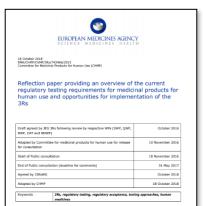
Agreed by 33RsWG		October 2018
Adopted by CHMP		18 October 2018
Keywords	ing approaches, human	
	3	
	EUROPEAN MEDICINES AGEN	
	al products for Veterinary Use (CVMP)	
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IMA/CHAP/CVN9/38a/ Committee for Medicine Reflection paregulatory to products and Draft agreed by JEG 3 SWP-V, JWP, ERAWP / Adopted by CVNP for Start of public consultation (defined of consultatio	at products for treatment that (COMS) sper providing an overview of sesting requirements for veter d opportunities for implement the following review by respective WPs (2005, and EWPO). strates for consultation tation.	inary medicinal tation of the 3Rs Merch 2016 21 April 2016 29 April 2016

Topic	Regulatory provision	Animal testing requirements	Implemented 3Rs opportunities	Newly identified opportunities for 3Rs implementation
Carcinogenicity	Note for Guidance on Carcinogenicity: Testing for Carcinogenicity of Pharmaceuticals (CPMP/ICH/299/95; ICH S1B)	rat 2 year carcinogenicity testing and ; mouse 1.5 year carcinogenicity testing or mouse 26 weeks TG bioassay (p53+/-, Tg ras H2, Tg.AC).		ICH Guideline S1 - Regulatory notice on changes to core guideline on rodent carcinogenicity testing of pharmaceuticals (EMA/CHMP/51230/2013): new testing paradigm under evaluation based on a more comprehensive and integrated weight-of-evidence approach to address the risk of human carcinogenicity of small molecule pharmaceuticals, and to define conditions under which 2-year rat carcinogenicity studies could be omitted.
Reproductive toxicity	Note for Guidance on the Detection of Toxicity to reproduction for Medicinal products & Toxicity to Male Fertility (CPMP/ICH/386/95; ICH S5(R2))	Study of fertility and early embryonic development to implantation: rat (or mouse) Study for effects on embryo- foetal development: rat and rabbit. Study for effects on pre- and postnatal development, including maternal function: rat (or mouse).		ICH S5(R2) is currently under revision. Aspects under consideration include evaluation of novel <i>in vitro</i> methodologies for embryo-foetal development testing within an integrated testing strategy and potential to replace one <i>in vivo</i> species.
Safety pharmacology	Note for Guidance on the Non-clinical Evaluation of the Potential for Delayed Ventricular Repolarisation (QT Interval Prolongation) by Human Pharmaceuticals (CPMP/ICH/423/02; ICH S78)	In vivo and in vitro tests as complementary approaches to assess the potential for QT interval prolongation.	Integrated test strategy including in vitro tests (e.g. hERG assay) for assessment of QT- prolongation (ICH S7B).	ICH S7B guideline is currently scheduled for revision. Aspects under consideration will be advances in the science and methods as currently discussed in the Comprehensive <i>In vitro</i> Pro-arrhythmia Assessment (CIPA) initiative.
	Note for Guidance on Safety Pharmacology Studies for Human Pharmaceuticals (CPMP/ICH/539/00; ICHS7A)	"Core battery tests" of CNS and cardiovascular/respiratory function .	Integration of safety pharmacology parameters in repeated dose toxicity studies (see ICH S9).	Inclusion of safety pharmacology endpoints: need for retrospective data analysis to expand concept beyond ICH S9.

Achievements of the JEG3Rs & J3RsWG (2/2)



Review of regulatory testing requirements / 3Rs







Achievements of the JEG3Rs & J3RsWG (2/2)



Review of regulatory testing requirements / 3Rs







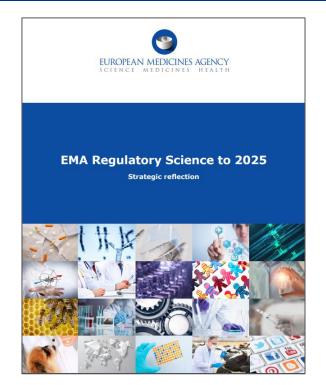
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EMA's Regulatory Science Strategy



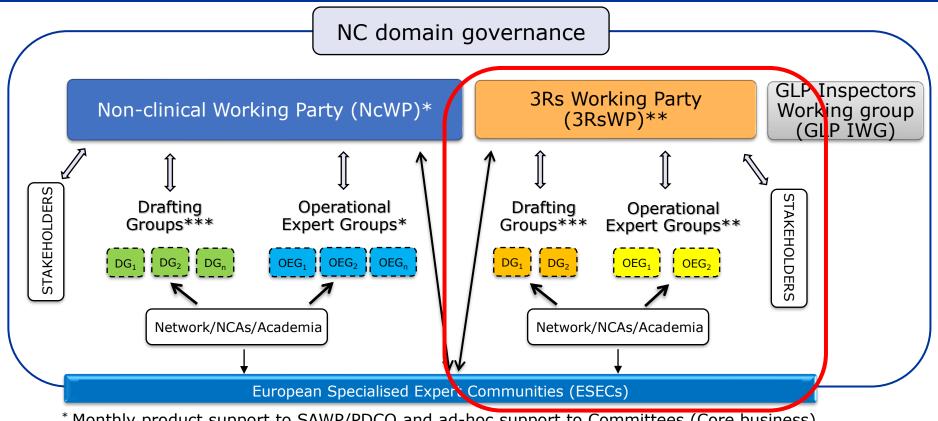


https://www.ema.europa.eu/en/aboutus/how-we-work/regulatory-sciencestrategy#regulatory-science-strategy-to-2025-section

- Core recommendations dedicated to leverage and qualification of 3Rs methods
- Raise awareness for 3Rs/NAMs and regulatory acceptance
- Need for discussion on criteria for regulatory acceptance (context of use, endpoints and reference compounds)
- Engagement with stakeholders to create communications channels and establish a good European regulatory network on NAMs
- Focal role of a 3Rs Working Party

The 3RsWP is embedded in the NC domain





Monthly product support to SAWP/PDCO and ad-hoc support to Committees (Core business)

^{**} Support to committees and operational tasks for 3Rs

^{***} Guideline development

The new 3Rs working party (3RsWP) (1/2)



- Joint 3Rs working party of CHMP & CVMP
- Strategic and visible WP to monitor and supervise the different 3Rs activities required to achieve the strategic goals in line with the EMA Regulatory Science strategy 2025 and the 3-year workplan of the NC domain
- **Multidisciplinary** aspects of the 3Rs (H & V) into a restricted core group (WP) complemented by Operational Experts Groups (OEGs), drafting groups (DGs) and Expert community (ESEC) with targeted expertise (E) to support the main operational activities (A).

A6 A2 H+V A5 A3 A4



European Specialised expert community on NAMs (NAMs ESEC) (NCAs/academia)

E	Е	Е	Е	E
Е	Е	Е	Е	Е
E	Е	Е	Е	Е
Е	Е	Е	Е	Е
E	Е	Е	Е	E

The new 3Rs working party (3RsWP) (2/2)



Composition

Sonja Beken (Chair)	BE	FAGG-AFMPS-FAMHP	Human MPs - NCWP, Non-Clinical
Sarah Adler-Flindt (Vice-Chair)	DE	Federal Office of Consumer Protection and Food Safety	Veterinary MPs - Non-Clinical
Elisabeth Balks	DE	PEI	Veterinary MPs - Batch release
Kathrine Just Andersen	DK	Danish Medicines Agency	Veterinary MPs - EWP-V, Non-Clinical and Clinical
Camilla Svensson	SE	МРА	Human MPs - Non-Clinical
Peter Theunissen	NL	МЕВ	Human MPs - Non-Clinical

- EMA support to 3RsWP: 3Rs@ema.europa.eu
 - Scientific secretariat: Stefano Ponzano and Orla Moriarty (H-Division), Michael Empl (Vet-division)
 - Administrative secretariat: Stavroula Tasiopoulou (H-division)
- Observers: European Commission, EURL ECVAM, EDQM
- **3RsWP Web Page:** https://www.ema.europa.eu/en/committees/working-parties-other-groups/chmp/3rs-working-party

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An ambitious 3Rs workplan with a vision to the future



High level strategic goals:

- Assume a strategic role in the field of the 3Rs with strengthened cooperation between all stakeholders and international partners
- Move non-clinical assessment from discovery toxicology towards regulatory use and acceptance of animal-free innovations or new approach methodologies (NAMs) (for hazard identification, toxicity prediction, ADME modelling, disease modelling)
- Ensure follow-up of the 3Rs in batch release testing of human and veterinary medicinal products
- Review and update of EMA guidelines to implement best practice regarding 3Rs and impact monitoring of implemented changes (including identification of new actions)
- Follow up of actions following EP resolution of 16 September 2021 on plans and actions to accelerate the transition to innovation without the use of animals (2021/2784(RSP))
- Follow-up and identification of actions related to alternatives to the use of non-human primates





26 January 2023 EMA/CHMP/14829/2023 Human Medicines Division

Consolidated 3-year work plan for the Non-clinical domain including the priorities for 2023

Domain Chairperson: Bruno Sepodes
Non-Clinical Working Party Chair: Susanne Brendler-Schwaab
Non-Clinical Working Party Vice-Chair: Karen van Malderen
3Rs Working Party Chair: Sonja Beken
3Rs Working Party Vice-Chair: Sarah Adler-Flinöt

Work plan period: May 2022 - December 2024 (with a first review point after one year)

https://www.ema.europa.eu/documents/other/non-clinical-working-party-consolidated-three-year-work-plan-non-clinical-domain_en.pdf

3RsWP Workplan – Guideline activities for 2023



NEW

- Reflection Paper on alternatives to the use of non-human primates (in collaboration with Non-Clinical Working Party)
- **Reflection paper** to define regulatory acceptance criteria for organ-on-chip technologies for specific contexts of use to be applied in the pharmaceutical area

REVISIONS

 Revision of Reflection Papers providing an overview of the current regulatory testing requirements for medicinal products for human and veterinary use and opportunities for implementation of the 3Rs'

3RsWP Workplan - Qualification of NAMs/3Rs



Development of COU-based qualification criteria

Qualification of NAMs

- Follow-up workshops on MicroPhysiological Systems/Organ-on-Chip with a specific focus towards method qualification for regulatory acceptance – 2023
- Define regulatory acceptance criteria for organ-on-chip technologies for specific contexts of use – 2023
- Creation of a worldwide cluster of regulators to establish regulatory acceptance criteria for NAMs and to harmonise views and regulatory acceptance criteria -2023
- Collaboration with the Methodology domain with respect to modelling and simulation, to support the regulatory acceptance of NAMs
- Support qualification of 3Rs methods for embryofetal development testing and follow up of 3Rs impact (ICH S5R3) – 2023
- Support qualification of 3Rs methods for cardiovascular safety pharmacology testing and follow up of 3Rs impact (Q&A ICH S7B)
- Review of skin sensitization testing recommendations by OECD in the light of applicability for topically applied medicinal products (HMPs) and user risk assessment (VMPs)
- Support to the Innovation Task Force and Scientific Advice Procedure for Regulatory acceptance and Qualification Advice/Opinion for NAMs - 2023

3RsWP Workplan – Other activities

2023

- Review of product batch testing requirements with regards to the application of the 3Rs (human and veterinary)
- Organise annual multistakeholder 3RsWP meetings on emerging 3Rs topics
- Mapping of current and future cooperation with EU and International NAM/3Rs stakeholders
- **Develop training** activities on 3Rs methods and best 3Rs practices across the EU network
- Establish a workflow for involvement of 3RsWP in the SA and 3Rs ITF procedures

Beyond 2023

- Organise an EMA 3RsWP-led multistakeholder conference to showcase the achieved progress with regards to 3Rs in the field of human and veterinary medicinal products and to introduce the new 3RsWP and future workstreams
- Perform a review of the most promising available 3Rs methodologies that could be considered for qualification
- Establish an easily accessible database for qualified/validated NAMs together with e.g. EDQM and EURL-ECVAM

Collaboration with EMA's Innovation Task Force on 3Rs



Multidisciplinary: scientific, regulatory & legal

Dedicated forum for early dialogue between regulators and stakeholders (e.g. SMEs, academics, researchers, research and public-private funded consortia (e.g. IHI), pharmaceutical industry)



Focus on emerging therapies, methodologies & technologies

NEW focus on regulatory acceptance of so-called new approach methodologies (NAMs) to replace the use of animals in the testing of medicines (3Rs)

→ e.g., in silico modelling & novel in vitro assays (e.g. MPS technology)

Objectives are to encourage the development of NAMs and accelerate their integration in the regulatory framework for the development and evaluation of medicines

Informal exchange of information and provision of guidance (non-legally binding) **early** in the development process during briefing meetings

Discussion led by multidisciplinary experts from the Agency network, and EMA working parties & committees – **best available scientific expertise**

The briefing meetings are free of charge

https://www.ema.europa.eu/en/human-regulatory/research-development/innovation-medicines#ema's-innovation-task-force-(itf)-section

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Take home messages



- Historically the EU Regulatory Network has been open to 3Rs
- EMA is clearly committed to the 3Rs
- New 3RsWP as the official 3Rs hub at the EMA
- EMA 3Rs strategy and ambitious workplan in place to support the work
- Engagement & open dialogue with interested 3Rs stakeholders
- Close collaboration with ITF 3Rs as essential tool for early engagement
- Global regulatory collaboration



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SLIDO



access to SLIDO: Slido - Audience Interaction Made Easy

Question 1: POLL

Which of the following best describes your interest/professional activity in the area of the 3Rs (choose one):

- Industry/contract research
- Academia
- Regulatory
- Animal welfare organisation
- Member of the public
- Other



Question 2: Priorities

Some of the workplan priorities of the 3RsWP for 2023 are listed below.

In your opinion, which of these goals is most important? **Please rank the topics in order of importance.**

- Development of **training activities** on 3Rs methods and best 3Rs practices across the EU regulatory network
- Development and promotion of regulatory acceptance criteria / qualification criteria for new approach methodologies (NAMs) to be applied in the pharmaceutical area
- Provide support to the Innovation Task Force (ITF) and in scientific advice 3Rs-related procedures
- Fostering 3Rs principles in batch release testing for human and veterinary medicinal products
- Identification of actions related to alternatives to the use of non-human primates in line with the 3Rs and the identified shortage of non-human primates

Question 3: Priorities NAMs work

One of the major objectives of the 3RsWP is to support the integration of 3Rs methods such as MicroPhysiological Systems/Organ-on-Chips into the regulatory framework.

What do you think would be the first step to support the qualification these types of new approach methodologies (NAMs) at EMA? **Please choose one**.

- Development of a guidance to define regulatory acceptance criteria for NAMs for specific contexts of use to be applied in the pharmaceutical area
- Focused workshop on MPS with relevant stakeholders for specific contexts of use
- Creation of a global cluster of regulators to establish regulatory acceptance criteria for NAMs

SLIDO



Question 4: Wordcloud

What do you think is the most important aspect when thinking about the 3Rs in regulatory testing and drug development?



Question 5: **Open suggestions**

What topics do you think the 3RsWP should prioritise or consider in its 2024 workplan?



Any questions? Suggestions?

Further information

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Send us a question Go to www.ema.europa.eu/contact

