



Commission proposal for an European Biotech Act

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Europe is losing global share

Europe remains a global leader in clinical trials, but its share is declining as other regions are increasing regulatory agility

Global Trend

Number of global clinical trial starts by region (2013, 2018-2023; Phase 1-4)

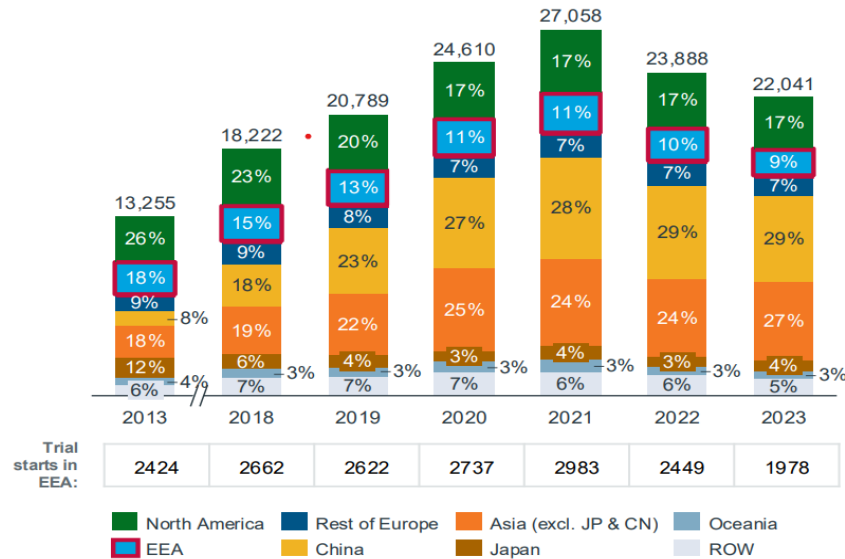
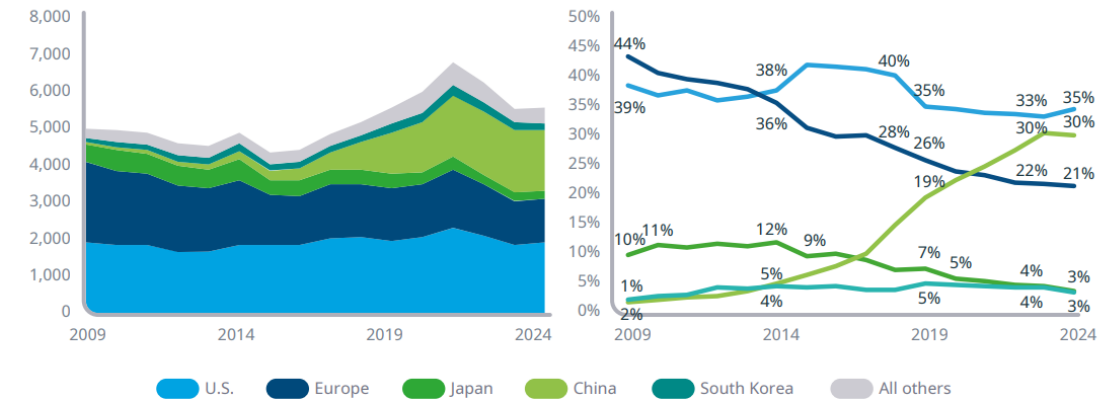


Exhibit 13: Number of Phase I to III trial starts based on company headquarters location, 2009-2024



Source: Citeline Trialtrove, Jan 2025; IQVIA Institute, Jan 2025.

Sources: EFPIA [assessing-the-clinical-trial-ecosystem-in-europe.pdf](#), IQVIA global trends in RnD 2025

Europe is losing global share

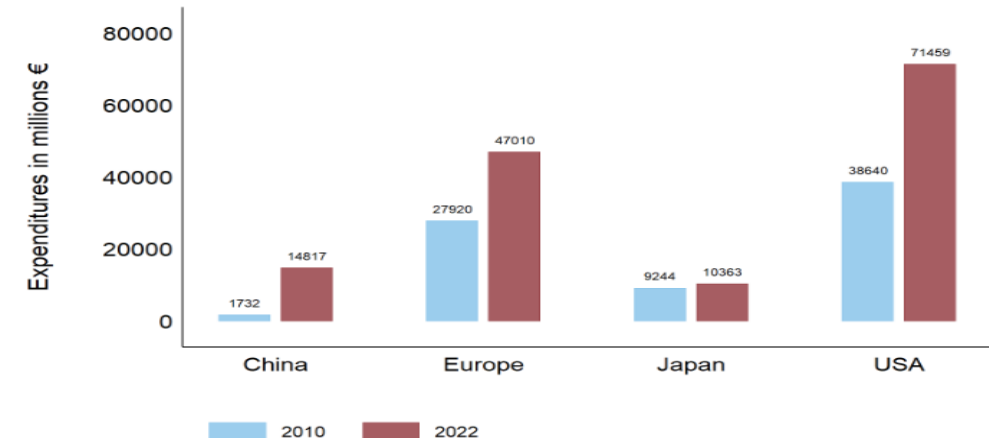
Clinical Trial Activity

- Globally the number of clinical trials has been substantially increasing over the last decade.
- Shift in geographical distribution of clinical trials.
 - EEA's share of global clinical trials declined from 18% in 2013 to 9% in 2023
 - China's share increased from less than 10% to nearly 30%

Key Take-aways

- **PAST TREND:** The EU did not capture a proportional share of the growth in clinical trials.
 - Leading to a **widening competitiveness gap** relative to other regions with potential implications for **economic performance and patients in the EU**.
- **FUTURE:** Risk of this gap widening further unless the regulatory framework is strengthened to increase the attractiveness of conducting clinical trials.

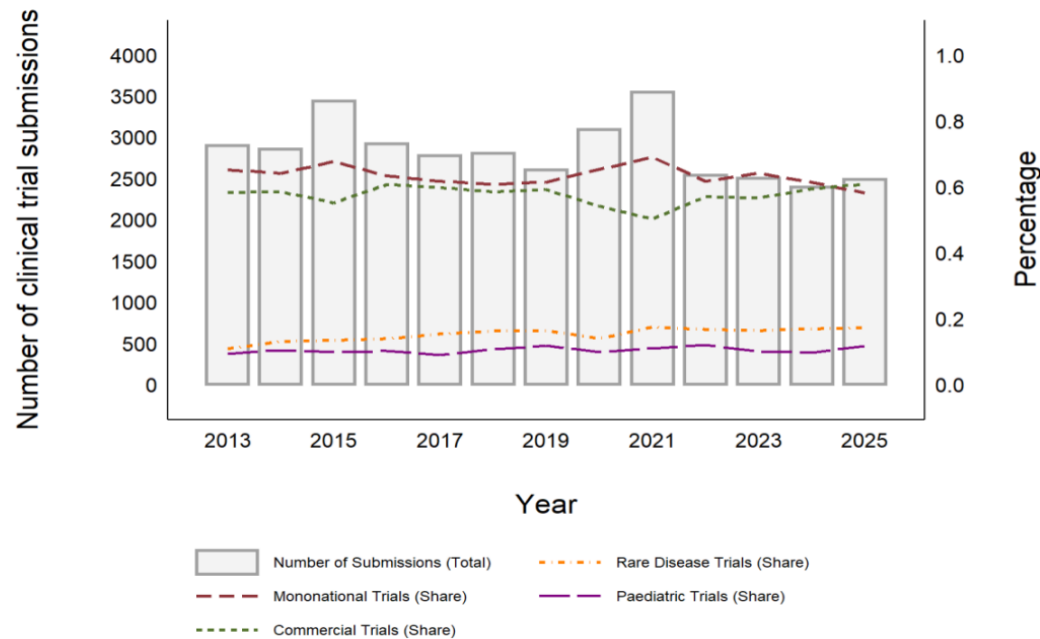
Pharmaceutical R&D expenditures*



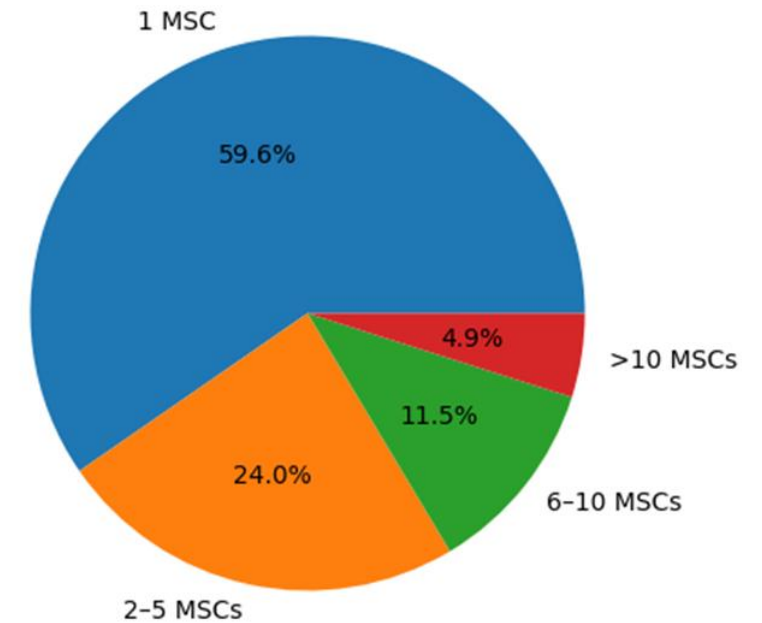
CTR improved coordination but trial volumes have not increased and fragmentation persists

Improved coordination and transparency under the CTR has not translated into higher application volumes.

Figure 2. Clinical trial activity in the EU¹²⁸



Clinical Trials by MSC Category (2023-2025)



[EU clinical trials during the 3-year CTR transition period](#)

data collection: 31 january 2022 - 30 january 2025

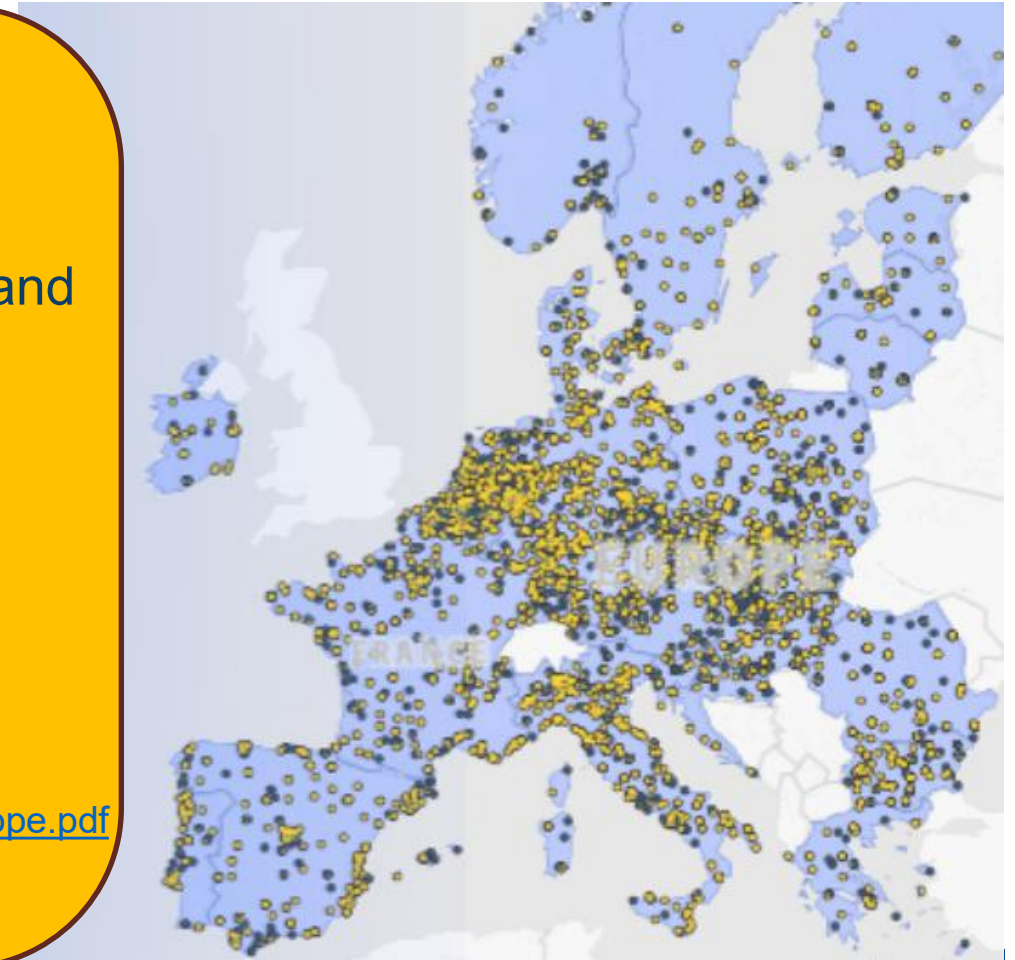
Why clinical trials matter for Europe

Clinical trials are public health and economic performance

- **500 000+ patient per year access innovative or improved treatments, including for rare diseases and cancers**
- **Stronger scientific excellence and skills**
- **€35.7 billion to the EU gross value added (GVA)**
- **165,000 jobs (for commercial trials)**

[EFPIA report \(2026\): the-economic-impact-of-industry-clinical-trials-across-europe.pdf](#)

Commission SWD for the Biotech act: [48009973-efbb-4101-ae8f-e81a34764e39_en](#)



Even modest increases could generate substantial benefits

~ 10% to 30% more
clinical trials in the EU

Economic Impacts

Commercial Trials

- EUR 3.7 to EUR 10.7bn per year
- 16,500 to 49,500 additional jobs

Public Health Impacts

Additional participants enrolled per year:

- In commercial trials: 7,847 to 23,540
- In non-commercial trials: 10,381 to 31,145

=> Earlier access to innovation by 5 to 10 years

Regulatory simplification in health biotechnology

Targeted regulatory reform of clinical trials

Fast

- 106->75 days (initial), 96->47 days (substantial modification)
- Parallel substantial modifications

Simpler

- RMS-led assessment, including for ethical review
- Product core dossier
- Risk proportionate approach
- Communication platform

More harmonised

- Combined studies
- EU common templates
- PHE trials

Digital

- AI and decentralized trials
- Regulatory sandboxes
- Single legal basis for processing of personal data

Faster authorization without lowering standards

		Validation				Assessment Phase						Decision
		Doc. cons	Submit RFI	RFI response	Submit val. conc	Circulate DAR	Doc consider.	Submit RFI	RFI response	Coord. review	Submit conclusion	Notification
Without RFI	CTR	7	-	-	10	36	48	-	-	-	55	60
	BTA	7	-	-	7	28	35	-	-	-	42	47
With RFI	CTR	7	10	20	25	51	63	70	82	94	101	106
	BTA	7	7	14	21	28	35	42	56	63	70	75

-23 days

-31 days

106-> 75 days (see also Stefan Strasser's presentation on FAST EU)

- Stronger RMS (no or shorter coordination and consolidation in validation or assessment, respectively)
- Parallel validation and initial assessment
- Comprehensive assessment with mandatory ethical review
- 7-day basis
- Alignment in part I and II (conditional approvals↓)
- Flexible communication

Impact to CTIS – Part I SM (art 17-19)

			Validation			Assessment Phase						Decision
		Doc. cons	Submit RFI	RFI response	Submit val. conc	Circulate DAR	Doc consider.	Submit RFI	RFI response	Coord. review	Submit conclusion	Notification
Without RFI	CTR	5	-	-	6	25	37	-	-	-	44	49
	BTA	4	-	-	4	21	24	-	-	-	28	33
With RFI	CTR	5	6	16	21	40	52	59	71	83	90	95
	BTA	4	4	8	14	21	24	28	35	38	42	47

-19 days

-28 days

-45 days

-48 days

95-> 47 days (48 days):

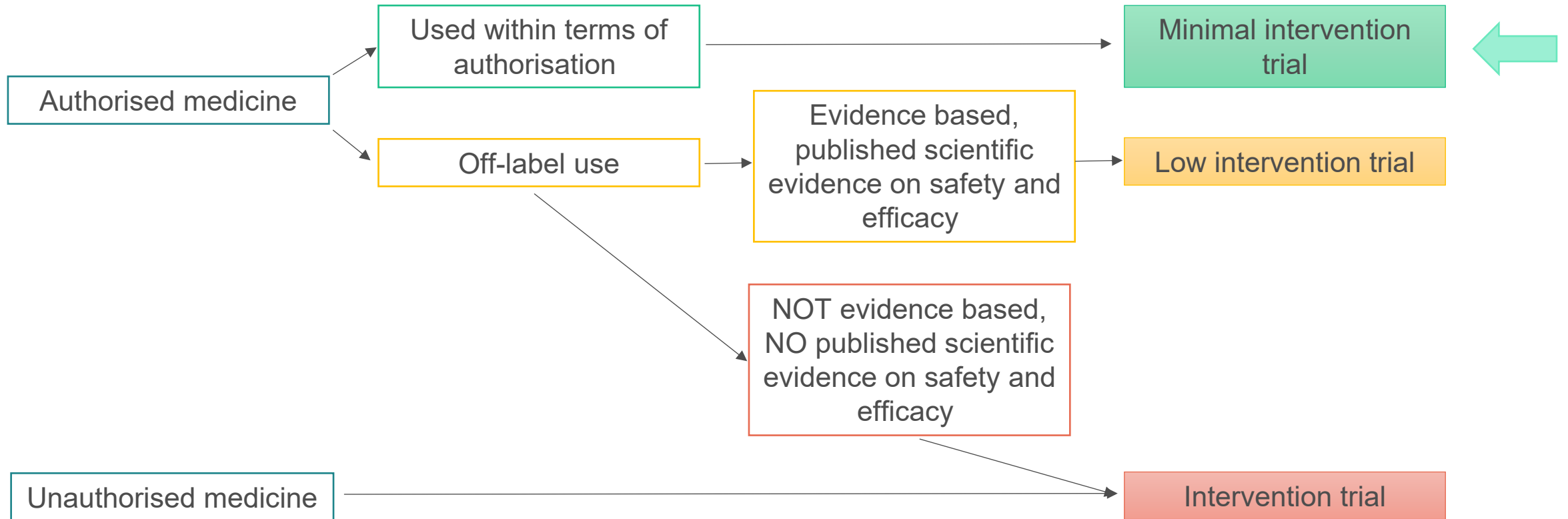
- Bigger impact of the strong RMS
- Parallel substantial modifications become possible

Comparison: Current CTR vs Biotech Act Proposal

Aspect	Current CTR	Biotech Act Proposal
Validation scope	Part I + Part II	Part I only
Validation responsibility	All Member States	RMS only
Validation process	Coordination & consolidation steps	No coordination or consolidation
Process structure	Sequential	Parallel (overlap with assessment)
Ethical review	Multiple Member States	Mandatory RMS-led review
MSC involvement	Broad and iterative	Limited, justified input only
Ethical scope	Less defined	Clearly defined
Communication	Fragmented	Structured channels
Part I / II timelines	Misaligned	Aligned
Part II templates	Divergent	Mandatory common templates
Conditions		Targeted and flexible
Use of Art 81.9 for document update	limited	More flexible

Risk-based approach

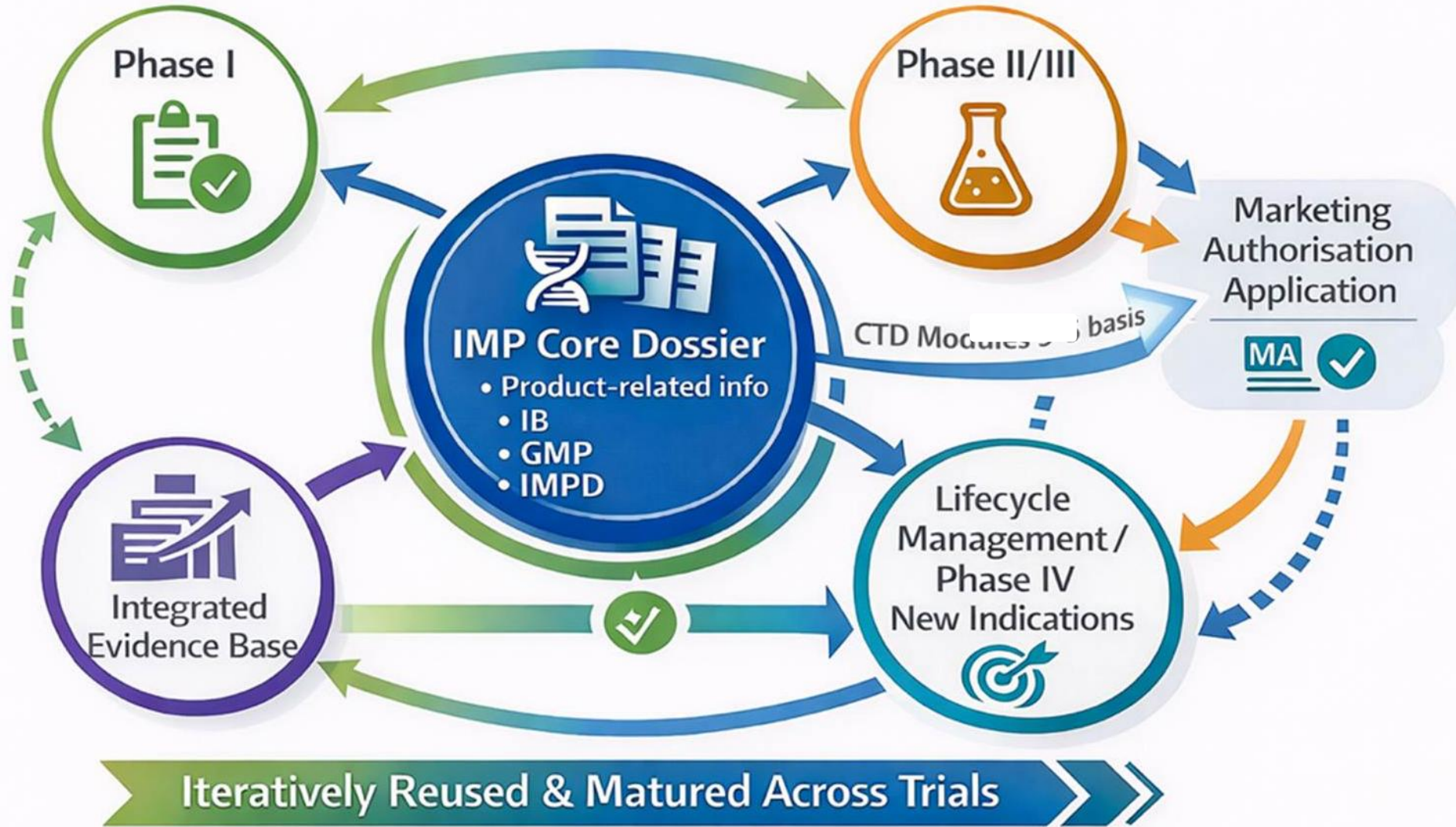
Risk categorisation



More proportionate approach: LICT, MICT vs interventional trials

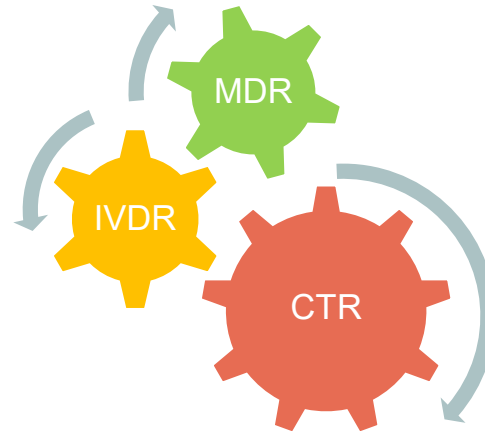
	CTR (536/2014)	BTA - Proposal
Authorisation procedure	Same procedure	• minimal-intervention clinical trials: only ethical review • low-intervention, intervention trials: full authorisation
Application dossiers – required documentation	Simplified requirements	• risk adaptations for minimal/low-intervention trials
Trial Conduct	Simplified requirements	targeted and simplified - safety reporting - distribution for IMPs - monitoring

Product Core dossier: reducing duplications



Continuously refined dossier supporting clinical research, new indications & post-marketing studies

Combined studies: 3 Regulations together



COMBINE
PROGRAMME

Authorisation:



Clinical trial of a medicinal product

CT: 3 Member States coordinate using CTIS



? No coordination between the 2 sets of authorisation processes in the Regulations



Performance study of IVD, e.g. for inclusion of patients

MD/IVD: currently 3 national authorisations processes

AI across the lifecycle of clinical trials

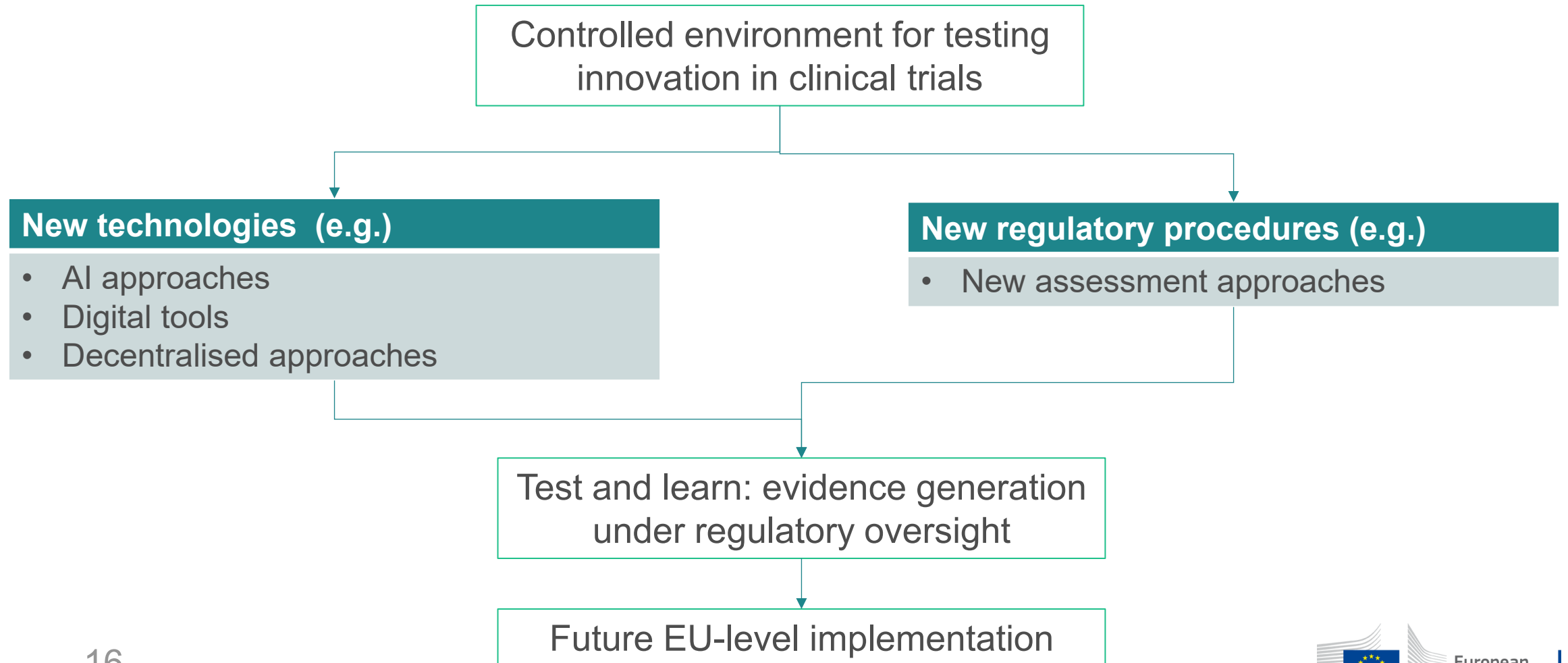
By regulators

- Assessment support
- Information retrieval
- Draft assessment reports

By Developers

- Draft study documentation
- Translations
- Safety monitoring
- Patient selection

Regulatory sandboxes for clinical trials



Key messages

- Europe is modernising the clinical trials regulation
- Faster assessment is achievable
- Regulation becomes more risk proportionate
- Product core dossier is a major opportunity for simplification
- Innovation is enabled through uptake of digital tools, AI and the setting-up of sandboxes



THANK YOU