

Legacy procedures – EMA proposal

Clinical Data Publication (Policy 0070) – Step 2 – EMA webinar

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Legacy clinical data - overview

October 2014: EMA adoption of Policy 0070 on publication of clinical data for medicinal products for human use

October 2016: first publication on EMA clinical data website

December 2018: suspension of Policy 0070 activities due to Brexit Business Continuity Plan

2020: clinical data publication activities resumed for COVID-19 medicines (exceptional transparency measures)

September 2023: relaunch of Policy 0070 – Step 1

2025: relaunch of Policy 0070 – Step 2 + legacy clinical data

Clinical data
publication legacy
(>1800 procedures)

Suspension and
step-wise relaunch

Publication backlog

step-wise relaunch of Policy 0070

EMA proposal for the publication of legacy clinical data

In view of the significant volume of clinical data publication legacy procedures, careful consideration has been given to how they should be handled as part of Step 2 of Policy 0070 relaunch

Main aspects considered:

- Balance between EMA's duties on clinical data transparency and resource management
- Sustainability of the cooperation of marketing authorisation applicants and holders to achieve compliance with Policy 0070
- Providing an adequate and timely response to public interest on clinical data
- Not interfering with the publication of clinical data packages related to the current regulatory procedures



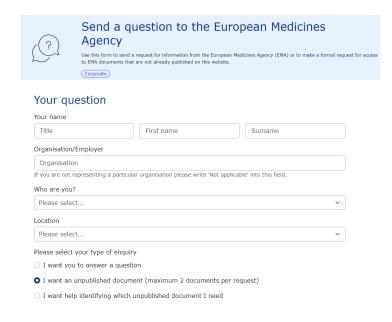
EMA proposal for publication of legacy clinical data

Option 1: processing the legacy in chronological order or by a priority list

- May not respond to the interest of the public in a timely manner
- Resource intensive
- Priority list: criteria may not satisfy all stakeholders

Option 2: publication upon request (access-to-documents)

- Responds to the interest of the public
- Resource compatible
- Processed in chronological order/repetitive interest of request received (still TBD)



Option 2: Access-to-documents requests related to legacy clinical data will trigger a clinical data publication procedure



Any questions?

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