EMA
EUROPEAN MEDICINES AGENCY

Reframing the voluntary data submission

14th industry stakeholder platform on research and development support

3 July 2025

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EMA's commitments to the 3Rs

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Human regulatory

Overview | Research and development | Marketing authorisation

Post-authorisation | Herbal products

- 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
- PRIME: priority medicines

Ethical use of animals in medicine testing

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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 marketing authorisation holders 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.

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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/EU[1]. 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.

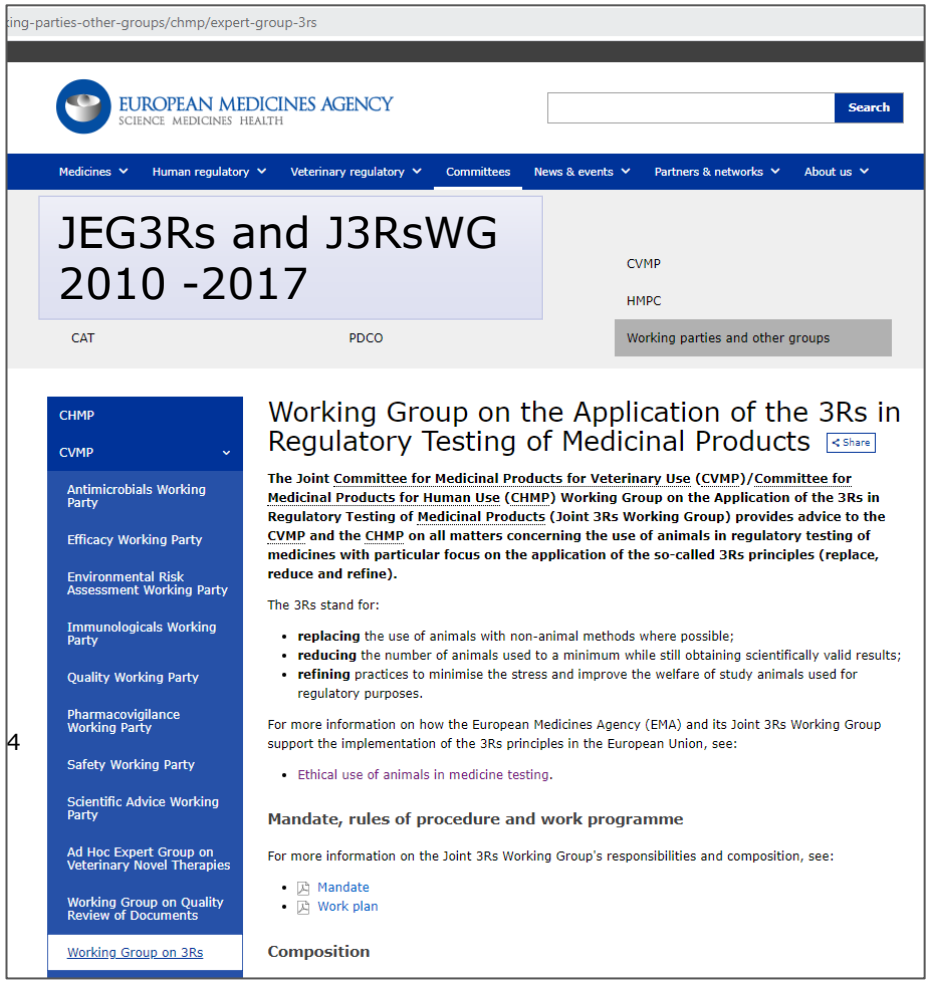
While significant progress has been made in relation to regulatory testing involving animals it remains the case that certain types of data can only be generated by means of animal studies. Where such studies are needed they should be selected and conducted in strict adherence to the 3Rs principles.

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

First joint CVMP/CHMP working party on the 3Rs in 2022



Workplan 2025-2027

Revision of the Guideline on principles of regulatory acceptance of 3Rs testing approaches

Scope

- Inclusion of definition of critical 3Rs-related terminology in the body of the guideline
- Inclusion of annexes providing regulatory acceptance criteria for complex in vitro models, including Organ-on-Chip (OoC) for specific contexts of use to be applied in the pharmaceutical area:
  - *CoU of predicting drug-induced liver injury*
  - *CoU of safety pharmacology testing*

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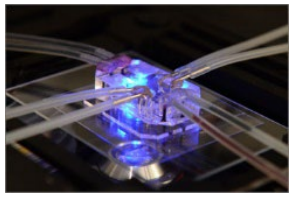
12 October 2023
EMA/CHMP/CVMP/452614/2023
Committee for Medicinal Products for Human Use (CHMP)
Committee for Veterinary Medicinal Products (CVMP)

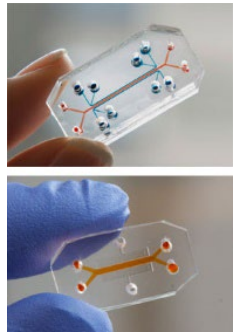
Concept paper on the revision of the Guideline on the principles of regulatory acceptance of 3Rs (replacement, reduction, refinement) testing approaches (EMA/CHMP/CVMP/JEG-3Rs/450091/2012)

Agreed by the 3Rs Working Party	June 2023
Agreed by the Non-Clinical Working Party	June 2023
Adopted by CHMP for release for consultation	12 October 2023
Adopted by CVMP for release for consultation	09 November 2023
Start of public consultation	20 November 2023
End of consultation (deadline for comments)	28 February 2024

Comments should be provided using this EUSurvey form. For any technical issues, please contact the EUSurvey Support .

Keywords	Regulatory acceptance, qualification, microphysiological systems, organ-on-chip, 3Rs, context of use, terminology





NAMs data

EMA

EMA interaction to foster regulatory acceptance of NAMs

Innovation Task Force

- Early Dialogue
- Informal exchange
- Regulatory, technical & scientific topic
- Free of charge
- Vet & Human

Portfolio and technology meetings

- Pharma companies with large medicinal product portfolios
- Issues impacting portfolio progression
- Anticipate scientific & regulatory needs
- Identify innovative technologies

Scientific Advice

- Product Specific
- Formal scientific guidance
- Study design / Methodology
- Vet & Human separate
- Reduced Fees (e.g. SME and academia)

Qualification of a Novel Methodology

- Innovative methods medicines R&D
- Acceptability of a methodology in a specific context of use
- Vet: through SA
- Reduced Fees (e.g. SME and academia)

Safe harbour

- Voluntary data submission
- Independent evaluation
- Builds regulatory confidence & experience
- Support the drafting of CoU-based qualification criteria

Problem statement – VDS proposal

Current issues

- **No NAMs qualified yet**, and **no data seen in MAA dossiers** using the safe harbour approach
- *Sometimes industry may fear NAM data will be negatively considered in regulatory decisions* (EFPIA presentation at EPAA meeting)
- By the time of MAA some NAMs could be outdated – not latest advancements
- Regulators struggle developing regulatory acceptance criteria for a CoU without having access to the data

Reframing the VDS procedure

Independent procedure from MAA and product specific procedures

Specific call for data to address a particular context of use

Safe space: confidential data only used for supporting regulatory acceptance of NAMs

Ad-hoc group of experts from the EU reg network and EMA staff will review the data

Benefits of the reframed VDS procedure

For regulators

- Gain confidence in and better understand NAM data
- Review data to help define and/or finetune context of use for a NAM
- Readiness and limitations for regulatory acceptance of a NAM within a specific context of use
- Support the drafting of context-of-use-based qualification criteria for NAMs

For method developers and applicants

- Confidential and independent procedure
- No interference with product specific assessment
- Additional support in reaching EMA qualification
- Appropriate/useful guidance with acceptance criteria supporting use of NAMs in CTA and MAA
- Harmonisation of regulatory requirements across the EU

Current action points

Initial engagement with companies via the PTMs:

- Introduce the VDS concept
- Assess willingness to share NAM-related data
- Be informed on NAMs in development and intended Contexts of Use (CoUs)

Input analysis and planning – Key considerations for the VDS pilot:

- Prioritisation of CoUs: strong existing frameworks (cardiotoxicity/DILI/reprotox) vs overlapping industry interests (Beilmann et al, 2025)
- Data sharing model: platform vs individual
- Data submission protocol
- Review process
- Outcome

Next steps and feedback

- **Collect feedback** on the reframed VDS procedure (July 2025)
  - Additional survey
- **Ad hoc meeting** with trade associations to discuss and co-create the VDS pilot (October 2025)
  - CoU to be addressed in the VDS pilot
  - Data submission protocol
  - Type of interaction within the review of the data
  - Expected outcome
- Present **concrete proposal** at the following R&D industry stakeholder platform (December 2025)
- **Start** with the VDS pilot in **Q1-Q2 2026**

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Thank you

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