

Public consultation on EMA Regulatory Science to 2025

Fields marked with * are mandatory.

* Name

* Email



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Introduction

The purpose of this public consultation is to seek views from EMA's stakeholders, partners and the general public on EMA's proposed strategy on Regulatory Science to 2025 and whether it meets stakeholders' needs. By highlighting where stakeholders see the need as greatest, you have the opportunity to jointly shape a vision for regulatory science that will in turn feed into the wider EU network strategy in the period 2020-25.

The views being sought on the proposed strategy refer both to the extent and nature of the broader strategic goals and core recommendations. We also seek your views on whether the specific underlying actions proposed are the most appropriate to achieve these goals.

The questionnaire will remain open until June 30, 2019. In case of any queries, please contact: RegulatoryScience2025@ema.europa.eu.

Completing the questionnaire

This questionnaire should be completed once you have read the draft strategy document. The survey is divided into two areas: proposals for human regulatory science and proposals for veterinary regulatory science. You are invited to complete the section which is most relevant to your area of interest or both areas as you prefer.

We thank you for taking the time to provide your input; your responses will help to shape and prioritise our future actions in the field of regulatory science.

Data Protection

By participating in this survey, your submission will be assessed by EMA. EMA collects and stores your personal data for the purpose of this survey and, in the interest of transparency, your submission will be made publicly available.

For more information about the processing of personal data by EMA, please read the [privacy statement](#).

Questionnaire

Question 1: What stakeholder, partner or group do you represent:

- ☐ Individual member of the public
- ☐ Patient or Consumer Organisation
- ☐ Healthcare professional organisation
- ☐ Learned society
- ☐ Farming and animal owner organisation
- ☐ Academic researcher
- ☐ Healthcare professional
- ☐ Veterinarian
- ☐ European research infrastructure
- ☐ Research funder
- ☐ Other scientific organisation
- ☐ EU Regulatory partner / EU Institution
- ☐ Health technology assessment body
- ☐ Payer
- ☐ Pharmaceutical industry
- ☐ Non-EU regulator / Non-EU regulatory body
- ☒ Other

Please specify: Press/media/NGO/Not-for profit organisation/other scientific organisations/policy maker, etc.

Press - writing for International Pharmaceutical Quality Journal, sharing regulatory dialogue and presentations from conferences. Former MHRA Licensing Division pharmaceutical assessor, with experience of working with notified bodies, both within and outside of MHRA. Contributed to MHRA horizon scanning, innovation office and early EU innovation network, including drafts of a reflection paper on borderline and combination products and concept paper leading to recent draft guideline on quality of drug /device combination products.

Name of organisation (if applicable):

International Pharmaceutical Quality journal (IPQ)

Question 2: Which part of the proposed strategy document are you commenting upon:

- ☒ Human
- ☐ Veterinary
- ☐ Both

Question 3 (human): What are your overall views about the strategy proposed in EMA's Regulatory Science to 2025?

Please note you will be asked to comment on the core recommendations and underlying actions in the subsequent questions.

The overall strategy is excellent - forward looking, ambitious and collaborative, reflecting the active listening and positive dialogue with stakeholders, both prior to and at the multi-disciplinary workshop.

At the ICMRA session at DIA Europe in 2018 on the Future of Medicines and Challenges for Regulators, many comments were made appreciating the openness being shown by regulators - recognising the need to share resources and expertise, reach out to innovators with no regulatory experience and 'think outside the box.'

Question 4 (human): Do you consider the strategic goals appropriate?

Strategic goal 1: Catalysing the integration of science and technology in medicines development (h)

- ☒ Yes
- ☐ No

Strategic goal 2: Driving collaborative evidence generation – improving the scientific quality of evaluations (h)

- ☒ Yes
- ☐ No

Strategic goal 3: Advancing patient-centred access to medicines in partnership with healthcare systems (h)

- ☒ Yes
☐ No

Strategic goal 4: Addressing emerging health threats and availability/therapeutic challenges (h)

- ☒ Yes
☐ No

Strategic goal 5: Enabling and leveraging research and innovation in regulatory science (h)

- ☒ Yes
☐ No

Question 5 (human): Please identify the top three core recommendations (in order of importance) that you believe will deliver the most significant change in the regulatory system over the next five years and why.

First choice(h)

5. Create an integrated evaluation pathway for the assessment of medical devices, in vitro diagnostics and borderline products

1st choice (h): please comment on your choice, the underlying actions proposed and identify any additional actions you think might be needed to effect these changes.

Among all the challenges outlined in the strategy, this is one that requires an enormous amount of effort to understand the differences in practice and rationale between medicines and devices regulation and terminology.

The proposals are commended and further comments, if helpful, are provided below.

The pharma industry have been sharing at conferences over quite a few years about the challenges they face internally, trying to break down silos and increase understanding and integration of functions. The FDA set up an Office of Combination Products in 2002 and are still learning and setting up co/ordination across the different divisions, as shared at the DIA Combination Products Conference in October.

One of the biggest challenges is the speed of development and change for medical devices, in particular where digital technology is involved. This contrasts sharply with the current paradigm for medicines variations and is already identified as a key point for further discussion on the DDC Guidance.

Utilising the experience of industry engineers is crucial to understand the science behind the design and control of the device components and to learn from the people who work with them on a daily basis.

More workshops bringing together industry, regulators and notified bodies, as in the TOPRA/RAPS Inter-regulatory Workshop on Combination Products in November could be extremely helpful, as would on-going training of assessors via case-studies through the EMA network.

The continued work of the HMA/CAMD Strategic and Operational groups on this topic would also be appreciated.

Second choice (h)

4. Facilitate the implementation of novel manufacturing technologies

2nd choice (h): please comment on your choice, the underlying actions proposed and identify any additional actions you think might be needed to effect these changes.

Novel manufacturing technologies and how to bring them into practice is a hot topic at conferences, both from industry and regulators. The actions proposed are commended.

In particular the considerations involved in point of care versus centralised manufacture are critical for the future success of ATMPs.

Third choice (h)

31. Disseminate and share knowledge, expertise and innovation across the regulatory network and to its stakeholders

3rd choice (h): please comment on your choice, the underlying actions proposed and identify any additional actions you think might be needed to effect these changes.

This was chosen because of the increasing importance of regulatory intelligence, in times when there are so many rapid advancements and new guidelines being developed. It is difficult to keep up for everyone involved and it is very much appreciated that regulators are presenting more often at professional, membership-led conferences to share current thinking, seek feedback and learn about new developments. This then affords the opportunity to share key messages within the pharma industry via delegates, and also via press representatives who can reach out to other stakeholders via journals and social media, especially in times when travel budgets are restricted.

Question 6 (human): Are there any significant elements missing in this strategy. Please elaborate which ones (h)

Linking between complex new treatment 'systems' (involving medicines, medical devices, diagnostics and/or digital adherence/monitoring technology) and discussions with HTAs across Europe, where the technology assessment boards, may have quite different assessment criteria and reimbursement models for medicines and medical devices.

Question 7 (human): The following is to allow more detailed feedback on prioritisation, which will also help shape the future application of resources. Your further input is therefore highly appreciated. Please choose for each row the option which most closely reflects your opinion. For areas outside your interest or experience, please leave blank.

Should you wish to comment on any of the core recommendations (and their underlying actions) there is an option to do so.

Strategic goal 1: Catalysing the integration of science and technology in medicines development (h)

	Very important	Important	Moderately important	Less important	Not important
1. Support developments in precision medicine, biomarkers and 'omics'	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Support translation of Advanced Therapy Medicinal Products cell, genes and tissue-based products into patient treatments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Promote and invest in the Priority Medicines scheme (PRIME)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Facilitate the implementation of novel manufacturing technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5. Create an integrated evaluation pathway for the assessment of medical devices, in vitro diagnostics and borderline products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Develop understanding of and regulatory response to nanotechnology and new materials' utilisation in pharmaceuticals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Diversify and integrate the provision of regulatory advice along the development continuum	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please feel free to comment on any of the above core recommendations or their underlying actions. **Kindly indicate the number of the recommendation** you are commenting on:

Strategic goal 2: Driving collaborative evidence generation – improving the scientific quality of evaluations (h)

	Very important	Important	Moderately important	Less important	Not important
8. Leverage novel non-clinical models and 3Rs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Foster innovation in clinical trials	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10. Develop the regulatory framework for emerging digital clinical data generation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. Expand benefit-risk assessment and communication	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. Invest in special populations initiatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. Optimise capabilities in modelling and simulation and extrapolation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14. Exploit digital technology and artificial intelligence in decision-making	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please feel free to comment on any of the above core recommendations or their underlying actions. **Kindly indicate the number of the recommendation you are commenting on:**

Strategic goal 3: Advancing patient-centred access to medicines in partnership with healthcare systems (h)

	Very important	Important	Moderately important	Less important	Not important
15. Contribute to HTAs' preparedness and downstream decision-making for innovative medicines	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
16. Bridge from evaluation to access through collaboration with Payers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. Reinforce patient relevance in evidence generation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
18. Promote use of high-quality real world data (RWD) in decision-making	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19. Develop network competence and specialist collaborations to engage with big data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
20. Deliver real-time electronic Product Information (ePI)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
21. Promote the availability and uptake of biosimilars in healthcare systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22. Further develop external communications to promote trust and confidence in the EU regulatory system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please feel free to comment on any of the above core recommendations or their underlying actions. **Kindly indicate the number of the recommendation you are commenting on:**

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Strategic goal 4: Addressing emerging health threats and availability/therapeutic challenges (h)

	Very important	Important	Moderately important	Less important	Not important
23. Implement EMA's health threats plan, ring-fence resources and refine preparedness approaches	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
24. Continue to support development of new antimicrobials and their alternatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

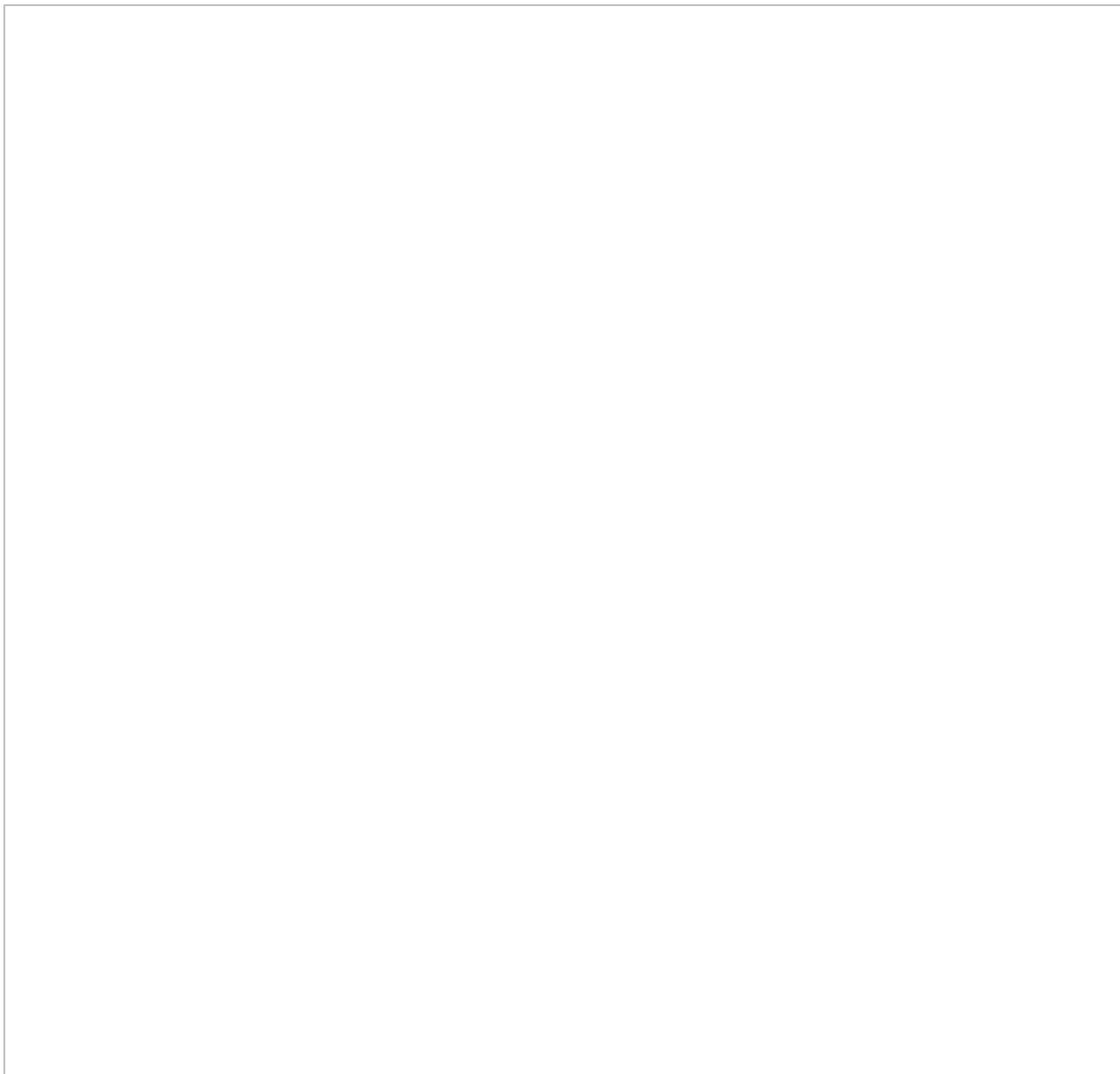
25. Promote global cooperation to anticipate and address supply challenges					
26. Support innovative approaches to the development and post-authorisation monitoring of vaccines					
27. Support the development and implementation of a repurposing framework					

Please feel free to comment on any of the above core recommendations or their underlying actions. **Kindly indicate the number of the recommendation you are commenting on:**

Strategic goal 5: Enabling and leveraging research and innovation in regulatory science (h)

	Very important	Important	Moderately important	Less important	Not important
28. Develop network-led partnerships with academia to undertake fundamental research in strategic areas of regulatory science	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
29. Leverage collaborations between academia and network scientists to address rapidly emerging regulatory science research questions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
30. Identify and enable access to the best expertise across Europe and internationally	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
31. Disseminate and share knowledge, expertise and innovation across the regulatory network and to its stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please feel free to comment on any of the above core recommendations or their underlying actions. **Kindly indicate the number of the recommendation you are commenting on:**



Thank you very much for completing the survey. We value your opinion and encourage you to inform others who you know would be interested.

Useful links

EMA website: Public consultation page (<https://www.ema.europa.eu/en/regulatory-science-strategy-2025>)

Background Documents

[EMA Regulatory Science to 2025.pdf](#)

Contact

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