EMA ACT-EU MULTI-STAKEHOLDER MEETING

SAFEGUARDING PARTICIPANTS WHILE DRIVING INNOVATION

VRIJE UNIVERSITEIT BRUSSEL

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THE WORLD NEEDS YOU

THE ORIGINS OF ETHICS COMMITTEES: WHY THEY MATTER

ETHICS REVIEW: CREATED TO PROTECT PEOPLE, NOT PROCESSES

- MRECs were established in the 1960s–70s after international research scandals revealed the need for independent moral oversight.
- Their goal: ensure research serves patients and society, not institutions or commercial agendas.
- Designed to be interdisciplinary and dialogical, uniting physicians, ethicists, lawyers, and lay or patient representatives.
- Ethics review was conceived as moral reflection in practice, not an administrative filter.

Ethics review was never meant to be a gate.

It was meant to be a conversation.

ETHICS UNDER PRESSURE IN A CHANGING RESEARCH WORLD

ARE WE PROTECTING PARTICIPANTS, OR PROTECTING COMPLIANCE?

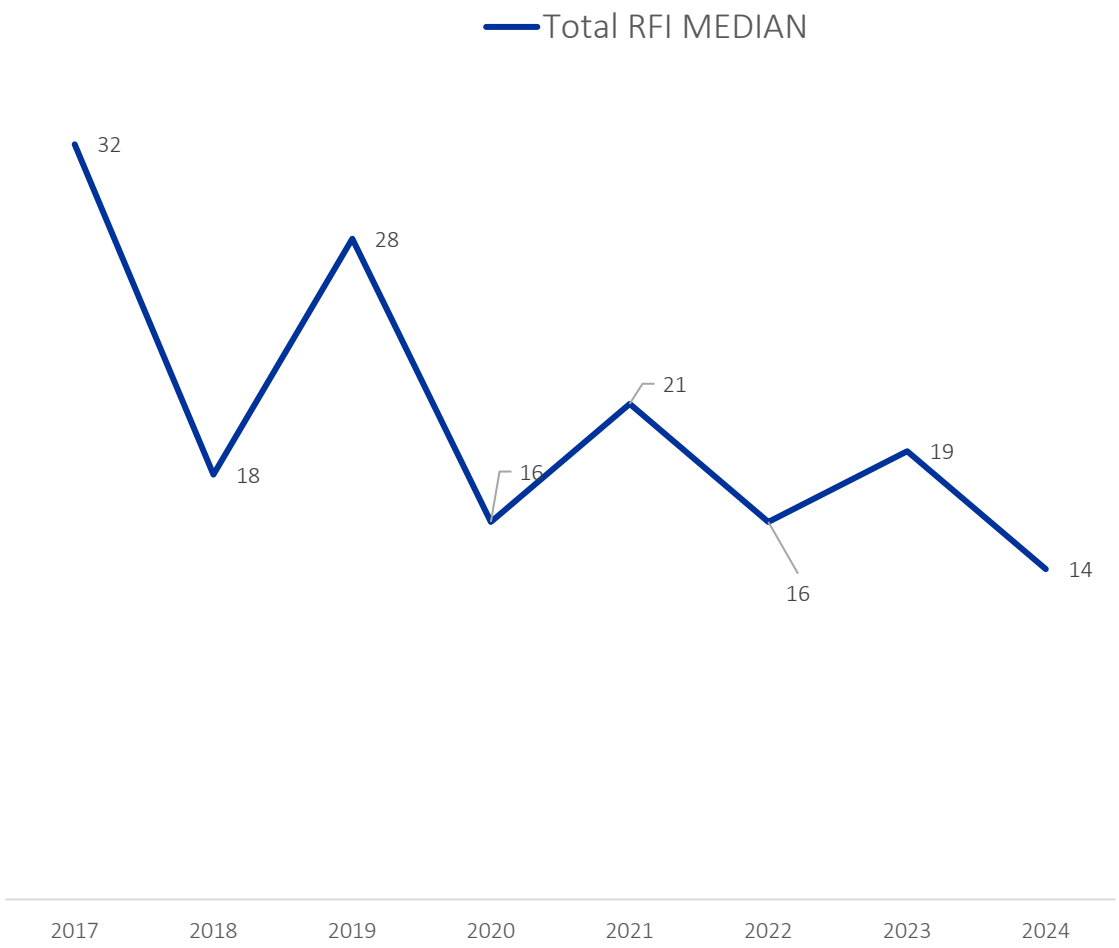
- The research ecosystem is transforming rapidly: AI, real-world data, adaptive and platform trials are redefining what a clinical trial means
- Committees face increasing complexity and procedural acceleration
- In Belgium, MRECs include clinicians, lawyers, ethicists, and patient representatives, all active in care, law and research.
- Their great strength lies in proximity to real clinical practice, but they are **volunteers** with full agendas.

WHAT THE DATA SHOW

6740 RFIS ANALYSED – FEWER REMARKS, BUT MORE LEGALISM

- Study based on the national assessment form, allowing systematic quantitative analysis.
- Overall RFIs declined → especially editorial comments, thanks to ***ICF templates***.
- Most common questions:
  - Part I: *statistics, trial rationale.*
  - Part II: *patient information and consent materials*.
- New themes emerging: decentralised trials, digital consent, AI-supported designs, ethnicity data.

WHAT THE DATA SHOW



Ethics review or compliance check? an empirical analysis of 6740 requests for information in Belgian clinical trial evaluations (2017–2024)

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Abstract

The EU Clinical Trials Regulation (CTR) was introduced to harmonize clinical trial evaluations across Member States while upholding participant protection and ethical integrity. This study analyzes 6740 Requests for Information (RFIs) issued by Belgian Medical Research Ethics Committees (MRECs) across 266 trial dossiers evaluated between 2017 and 2024, spanning both the CTR pilot phase and the initial CTIS implementation. Using framework content analysis, we examined the number and content of RFIs in relation to trial outcomes, sponsor type (commercial vs. non-commercial), and the MREC's role as Reporting Member State (RMS) or Member State Concerned (MSC).

Results show a decline in total RFIs over time, mainly due to a reduction in typographical and linguistic remarks, yet significant variability persists in the formulation and scope of ethical feedback. While statistical and methodological concerns remained central in Part I evaluations, RFIs increasingly addressed newer challenges such as decentralized trials, e-consent, and data collection on ethnicity. Part II RFIs continued to focus heavily on informed consent documents. We further observed that MSCs raised fewer RFIs than RMSs for Part I, prompting reflection on the necessity and efficiency of full multi-state review in this section.

The study also highlights a growing emphasis on regulatory compliance—sometimes at the expense of ethical deliberation—and the limited authority of policy advisors to correct inconsistencies, despite their expertise. We recommend clearer guidance, formalized roles for policy advisors in quality control, improved pre-submission processes, and limited direct communication between MRECs and sponsors. These findings support ongoing efforts to improve ethics review efficiency and quality under the CTR, with broader relevance for harmonization across Europe.

Keywords Ethics review, Medical research ethics committees (MRECs), Clinical trials regulation (CTR), Requests for information (RFIs), Clinical trial evaluation, Regulatory compliance, Decentralized trials, Informed consent forms (ICFs), Ethics and compliance, Harmonization of ethics review, Ethics in research

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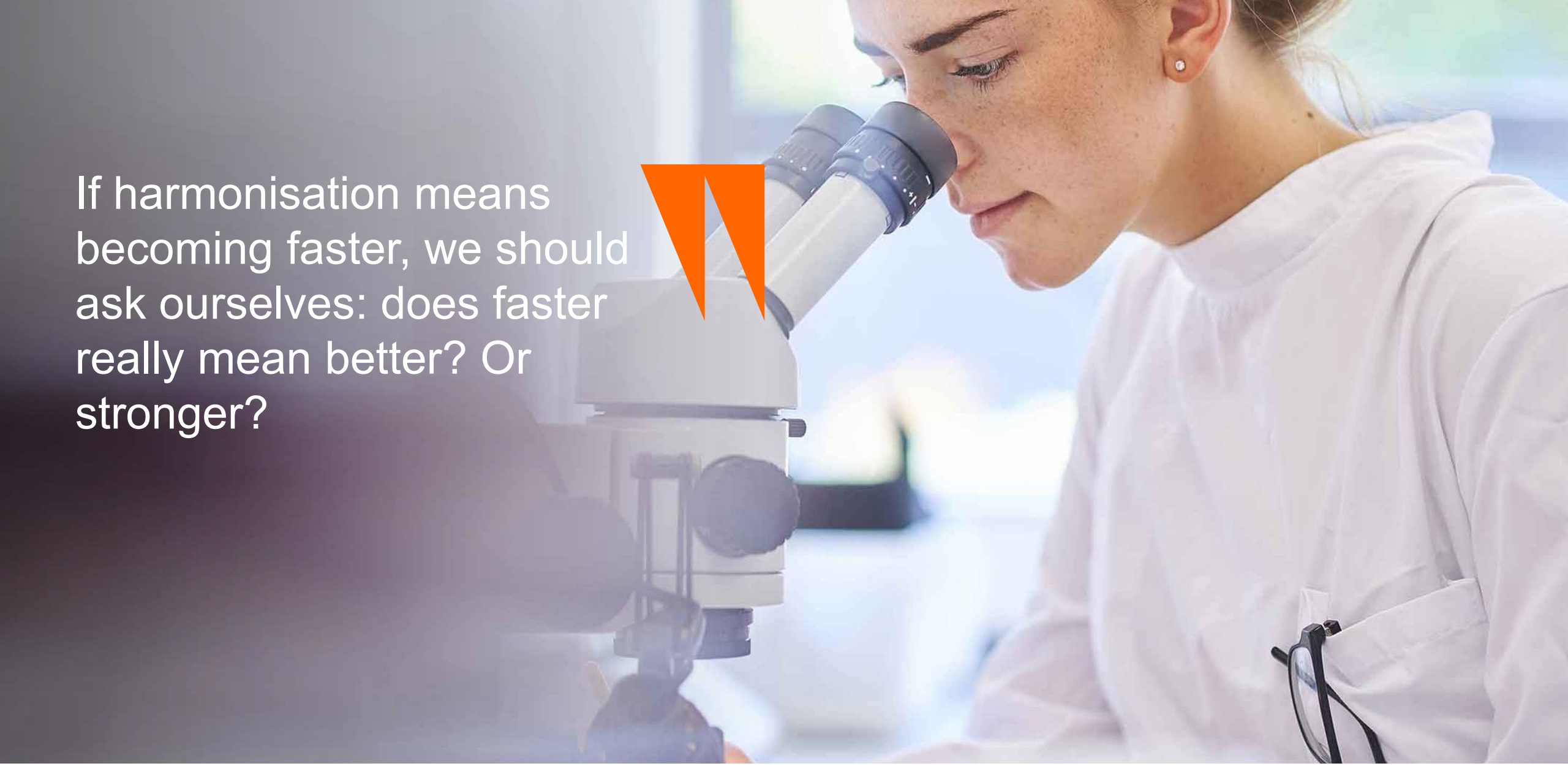
THE PACE PROBLEM: LAW, TIME & SCOPE

SPEED CAN ERODE REFLECTION.

- The CTR has been fully in force for *only three years* → adaptation is still ongoing.
- Europe is attempting to harmonise 27 culturally rooted ethics systems + 27 legal systems
- MedEthics has existed only one year —> coordination is still maturing, more effective with official CTR recognition?
- We can and must be more efficient → but not at the cost of reflection or participant protection.
- **Bridging the translation gap!**
  - **Sponsors** benefit from submitting *fully complete, high-quality dossiers* : *reducing unnecessary back-and-forth*.
  - **MRECs** often say they lack time: but if that's true, why would they waste effort writing *non-critical* remarks?

    --> Reviewers are volunteers



If harmonisation means becoming faster, we should ask ourselves: does faster really mean better? Or stronger?

UNDERSTANDING BEFORE HARMONISING

EFFICIENCY REQUIRES MUTUAL UNDERSTANDING.

- How can we reach efficiency if we don't understand each other's systems?
- We need deeper comparative insight: surveys, interviews, pilot studies across Member States.
  - Pilot study: 4 MS

  Example: when a country says, "*one central ethics committee,*" does it mean one legal entity or an administrative hub supporting several ECs?
- Workshop Pharma.be "Sponsor feedback":
  - *"We receive contradictory GDPR questions — but are they really contradictions, or different ethical interpretations of data risk?"*
- We have the data in CTIS we must structure and analyse it before drawing conclusions.
- Legislative reform should be thoughtful, not legislative "plumbing" —> tightening pipes without rethinking design.

ETHICS OR COMPLIANCE?

ETHICS CREEP OR COMPLIANCE CREEP?

- Our study: Many RFIs over-apply or misinterpret legal provisions.
- Ethics committees need legal support, not more legal work.
- Suggested reform:
  - Pre-check for administrative and regulatory compliance.
  - Ethics phase for **substantive interdisciplinary reflection and dialogue** on participant protection, autonomy, and proportionality.

Ethics as partnership, not paperwork

A EUROPEAN REFLECTION SPACE

HARMONISATION THROUGH DIALOGUE, NOT UNIFORMITY

- We need more shared knowledge on MREC functioning and RFI patterns — why committees ask what they ask.
- Are differences due to dossier quality, or legitimate ethical interpretation?
- Templates like the ICF help, but flexibility remains essential.
- Cultural pluralism in the ethics review is a strength, *not an obstacle*, for ethical oversight in Europe

HARMONISATION SHOULD NEVER MEAN HOMOGENISATION

CLOSING VISION

ETHICAL OVERSIGHT AS EUROPE'S INNOVATION ADVANTAGE

- No ethics washing We can streamline without simplifying ethics:
- The future lies in efficiency with reflection: allow (time for) discussion
- Ethics protects people, by people, and is therefore subjective, but profoundly valuable.
- Ethics must remain interdisciplinary, rooted in local culture, and open to dialogue between experts and non-experts.
- It takes reflective time → not a checklist, not an AI.

Ethics is not a pause in innovative progress → it is what keeps progress human

THINKING NEVER SUBMITS, NEITHER TO A DOGMA, NOR TO A PARTY, NOR TO A PASSION, NOR TO AN INTEREST, NOR TO A PRE-JUDICE, NOR TO ANYTHING, BUT ONLY TO THE FACTS THEMSELVES, FOR MAKING IT SUBJUGATE MEANS THE END OF ALL THINKING

Henri Poincaré (1912-1854)

THANK YOU!

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