

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.

Non-Governmental Organisation (NGO)

Name of organisation (if applicable):

Health Action International (HAI)

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.

Above all, market authorization process needs to be modernized to favor that meaningful innovation reaches patients. This may be achieved by raising the bar for approvals of new medicines, amending the current processes and prioritising public health needs.

Some actions that could be taken in the short/mid term

- Increase transparency of the system (Scientific Advice, Randomised Clinical Trials-RCT protocols summary and data and anonymised individual patient data (IPD) made effectively publicly available)
- Conduct an impact assessment of regulatory activities especially in instances such as the Priority Medicines Scheme (PRIME) & conditional marketing authorisation (CMA)
- Guarantee that RCT data (incl. IPD) are available to the scientific community for re-analysis and use supporting further drug development
- Demand comparative RCT whenever possible. Confirmatory studies should rely on patient relevant outcomes and answer clinically relevant questions (e.g. comparative evidence). Patients (but also clinicians and health care payers) need to feel confident that a new treatment works in comparison to alternative options (if any) and this should be part of the risk-benefit assessment; Require that one of the 2 RCT for approval should be done by an independent party. The EMA can demand raw-data for re-analysis. The EMA should make use of its existing power to mandate two RCT. Demand superiority trials whenever possible rather than non-inferiority trials
- The EMA should perform statistical analysis in house on raw data while ensuring the independence and integrity of the process. Such analyses should be available to 3rd parties
- Registrational protocols should be made publicly available for comments before start of the studies (to avoid using suboptimal comparators)
- EMA should consider the duration of treatment in the assessment process and enforce stricter criteria in post-marketing authorization trials and surveillance. This includes appropriate study designs and endpoints to close information gaps remaining at the point of marketing authorisation.
- Demand better statistical analysis of observational data (incl. public registration of a detailed study protocol and analysis plan, before start of the study)

We note favorably linking of specific regulatory remarks to later HTA decisions. Of importance, regulatory requirements could be adapted, so they meet the demands of HTA payers and society.

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)

16. Bridge from evaluation to access through collaboration with Payers

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.

Foster and promote transparency in early stage of procurement/adaptation of medical technologies in health care settings through payers involvement.

Second choice (h)

15. Contribute to HTAs' preparedness and downstream decision-making for innovative medicines

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.

Contribute to the rationalization of reimbursement decisions priming evidence and added therapeutical value.

Third choice (h)

16. Bridge from evaluation to access through collaboration with Payers

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.

Involve relevant stakeholders to promote and improve access to medicines

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

A critical review of the implementation of the orphan drugs legislation is important to ensure that the incentives foreseen by the legislator are not abused, misused or overused to the detriment of patients. Pharmacovigilance is practically never mentioned in the strategic document, while it is a key role of the EMA. The Agency should first and foremost guarantee that the medicines on the market are safe, and the activities of pharmacovigilance should be strengthened with drugs arriving on the market at an early development stage.

2. The strategy of the EMA should include a reflection on the increasing risks of conflicts of interest raised by the planned strategy, which proposes to increase scientific advice and early relations with drug developers, with the risk to transform the EMA in a co-developer of medicines. The set up of an ethics committee with external and independent personalities should be planned

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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
4. Facilitate the implementation of novel manufacturing technologies	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Develop understanding of and regulatory response to nanotechnology and new materials' utilisation in pharmaceuticals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. Expand benefit-risk assessment and communication					
12. Invest in special populations initiatives					
13. Optimise capabilities in modelling and simulation and extrapolation					
14. Exploit digital technology and artificial intelligence in decision-making					

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17. Reinforce patient relevance in evidence generation	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
20. Deliver real-time electronic Product Information (ePI)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 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:**

Put in place effectively stringent mechanisms to avoid conflict of interest in academics and researchers providing advice to EMA.

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

RegulatoryScience2025@ema.europa.eu