Contribution ID: 0a60f2b1-2cff-4b8f-b500-9b2a816cf380
Date: 27/06/2019 14:29:37

# 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:***

*between 1 and 1 choices*

- [ ] Individual company
- [x] Trade association
- [ ] SME

***Name of organisation (if applicable):***

AnimalhealthEurope

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

- ( ) Human
- (•) Veterinary
- ( ) Both

## Question 3 (veterinary): 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 initiative of the EMA to reflect deeply on its regulatory science strategy for the next 5 years is greatly welcomed and greatly needed given the many challenges - and opportunities - ahead. We believe this is an excellent foundation to further elaborate the strategy and shape the future regulatory framework.

Some common themes emerge in the AnimalhealthEurope members' comments:

- Many aspects of the strategy and its goals are highly appreciated and supported by AnimalhealthEurope.
- Every reference to novel therapies or novel VMPs should be expanded to "novel therapies and novel approaches to existing technologies"; this includes novel approaches to manufacturing both novel and more classical therapies, and novel approaches to clinical endpoints. A "novel" approach to benefit-risk assessment could also be required for certain novel therapies.
- In many places there is reference to collaboration with academia; the strategy should not overlook that in many new scientific areas the experts lie within companies, particularly when considering the practical application of a new technology. Therefore the strategy should include more reference to finding ways to engage also with industry experts.
- Industry has to work with applied science and that is generally a different approach compared to academia, who are generally more focussed on basic research. A conflict between "like to know" and "need to know" may result, which could have a negative impact on affordability of innovation. Keeping the focus will be imperative, as the academic drive for information can cloud any risk benefit assessment.
- It is sensible to share resources with the human medicines sector where commonalities exist; however a sharp eye must always be retained on the specific characteristics of the VMP sector, which can be very different from the HMP sector, and know when a different or at least more tailored approach must and often can be taken (such as ability to directly work with the target species from the start).
- AnimalhealthEurope actively supports the further development and application of 3Rs standards. However, major barriers exist, such as the acceptability of alternative methods, the international dimension and the lack of alternative tests developed for the needs of the veterinary sector.
- The strategy focuses on regulatory science, naturally, but it should also address the aspect of preparedness for emerging threats, and how to respond rapidly and flexibly. Prevention of disease is equally, if not more, important. The standard commercial market model does not work in these situations, and other solutions and 'business' models need to be found.

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

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

- (●) Yes
- ( ) No

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

- (●) Yes
- ( ) No

Strategic goal 3: Addressing emerging health threats and availability/therapeutic challenges (v)

- (●) Yes
- ( ) No

Strategic goal 4: Enabling and leveraging research and innovation in regulatory science (v)

- (●) Yes
- ( ) No

**Question 5 (veterinary): 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 (v)

Please note that veterinary goals start at no.32

32. Transform the regulatory framework for innovative veterinary medicines

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

The drafting of new annexes for Regulation 2019/6 is mentioned as a help for defining standards. Although it is good to see reference to future-proofing, it is not possible to be entirely reassured without understanding exactly what is meant by “technical standard” given the annexes will be part of legislation, thereby limiting possibilities to update these technical standards in a timely manner.
It should be changed to “define an environment that may allow flexibility in defining appropriate standards” or at least change from “technical standards” to “technical framework”.
Therefore; rather than providing rigid standards that could ultimately block/delay innovation, the annex should provide a framework which is to be supplemented by guidance as appropriate. This guidance can propose proportionate technical standards, which in turn would be easier to update as the knowledge base increases and as such, would ensure that standards can and will be future-proofed.
A big factor in this is the ability for early dialogue – Scientific Advice, and even IFT, can be too structured – we need more flexible mechanisms for regulators to engage with industry in discussing innovation in all aspects, product development, manufacturing and 3Rs.

Increase EU network capacity: Sharing resources with human side (or human experience) is a reasonable strategy but it should be highlighted that the veterinary sector is different from the human medicines sector, so the same technology may be treated differently (ie less in-depth background knowledge as we do studies directly in the target species and so the need for significant basic science/research in the area and/or in extensive in-vitro or model work as done for human medicines is not justified).
Any reference to using human medicines expertise or experience or approaches must always be caveated with the need for appropriate tailoring to the vet sector. Simply applying human medicine approaches will not always be appropriate or even feasible.

## Second choice (v)

Please note that veterinary goals start at no.32

34. Facilitate implementation of novel manufacturing models

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

The role and contribution of innovation in manufacturing is often over-looked. Bringing this topic into the open will create a significant change in approach.  It should cover not just new scientific techniques, but also new approaches to validating quality assurance.

## Third choice (v)

Please note that veterinary goals start at no.32

39. Develop new approaches to improve the benefit-risk assessment of veterinary medicinal products

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

The increased focus on the safety concerns of AMR and environmental safety need to be accompanied by new approaches to the benefit-risk assessment to avoid that there is a significant detrimental impact on innovation. This is particularly important to counter the perceived trend for more focus on (potential) hazards rather than identified risks.

There is emphasis on definition and standards for novel therapies. A degree of open mindedness to assess the benefits of novel endpoints as they emerge would be beneficial.

There is a risk of defaulting to pre-defined “standards” which will inevitably become outdated as science progresses.

## Question 6 (veterinary): Are there any significant elements missing in this strategy. Please elaborate which ones (v)

There is a perception that the EU regulatory climate is negative towards innovation. This will have a negative impact on bringing new products first to the EU – companies will launch elsewhere first, or will not bring these innovations to the EU at all.
Part of developing a regulatory science strategy could be to investigate the reasons behind this, and how to communicate the benefits of new sciences to the general public; actions must be carefully screened to avoid inadvertently reinforcing the public’s perception of a perceived risk, where this is ill-founded. To promote trust, the EU has the most comprehensive approach to transparency, however, broad-brush transparency without proper risk communication only exacerbates the situation both for Industry and the general public. Agencies such as the EMA should step up on embracing new products and technologies that are assessed as safe and efficacious and intensifying their risk communication to the public as an integral pillar of risk management.

## Question 7 (veterinary): 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 (v)

| | Very important | Important | Moderately important | Less important | Not important |
|---|---|---|---|---|---|
| 32. Transform the regulatory framework for innovative veterinary medicines | ◉ | ○ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| 33. Reinforce and further embed application of the 3Rs principles | ○ | ◉ | ○ | ○ | ○ |
| 34. Facilitate implementation of novel manufacturing models | ◉ | ○ | ○ | ○ | ○ |

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**:

32.: Please see the previous comments regarding annex II of Regulation 2019/6

33.: Pursuing 3Rs standards is a worthy goal but requires a significant amount of resources that may be justified for new products, but such re-investment in existing products is likely to be problematic, especially for products (vaccines, in particular) that do not have a large market; the animal welfare benefits of retaining the products must also be put in the balance. A major challenge is the amount of data requested; it would be better to focus on consistency and benefit-risk. Therefore, a MUMS type approach or other forms of incentives are needed to promote a switch to in-vitro tests for those products, as they do not always warrant further investment, and would be lost from the market if reinforced standards are applied.
A key barrier to implementing 3Rs is international acceptance outside the EU. International recognition of 3Rs approaches is necessary. With the still increasing globalisation of the Industry, animal testing will still need to be performed as long as one major region/country will require this, even if other regions have adopted alternative methods. We have seen this example occur with the (removal of) target animal batch safety test for veterinary vaccines.

34.: The impact of novel manufacturing models on the role of the qualified person and on the place for official batch release may need to be considered and clarified. GMP flexibility should not be only for novel science but also for innovative approaches as well (e.g. acceptance of non-sterility requirement for oral vaccines).

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

| | Very important | Important | Moderately important | Less important | Not important |
|---|---|---|---|---|---|
| 35. Update Environmental Risk Assessments in line with the latest scientific knowledge | ○ | ○ | ○ | ◉ | ○ |
| 36. Apply the latest scientific principles to the assessment of the safety of residues of veterinary medicines | ○ | ◉ | ○ | ○ | ○ |
| 37. Collaborate with stakeholders to modernise veterinary pharmacoepidemiology and pharmacovigilance | ○ | ◉ | ○ | ○ | ○ |
| 38. Develop new and improved communication and engagement channels and methods to reach out to stakeholders | ○ | ○ | ◉ | ○ | ○ |
| 39. Develop new approaches to improve the benefit-risk assessment of veterinary medicinal products | ◉ | ○ | ○ | ○ | ○ |

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**:

35.: Ensure impact assessments are proportionate to the risks and well balanced with the benefits brought by the product.
This section is entirely focusing on active substances, while one would expect it to be dealing with products, given the new Regulation that continues to deal with product assessment in the foreseeable future. An ERA for active substances can only look at the inherent hazards of a substance, and link the risk assessment to certain thresholds (e.g. for toxicity, or persistence, or bioaccumulation potential) or presence/absence of certain properties (e.g. antibacterial activity, endocrine activity). An ERA for products will take these hazards into account, but will link this to potential exposure of the environment to ultimately make an assessment of risks.
These are two fundamentally different approaches and a careful review of wording and/or clarification of intended approaches may be advisable.

36.: An increased capability in modelling would be very useful.
The cumulative risk of exposure to residues from multiple active substances is impractical given the infinite number of different combinations that could be encountered, with veterinary medicines being only one of many potential sources of exposure.

37.: pharmacoepidemiology is important but not defined and its scope is not described in the body of the text.

38.: Acknowledgement of the need for proportionate, meaningful labelling would be welcome. There is a global trend towards disproportionate labelling. Examples exist where single cases of AEs in trials resulted in label warnings which adhere irrevocably to the product and are damaging, don't help the end user and are impossible to remove – given it is scientifically challenging to prove a negative.

39.: New methods for the B/R for 'novel' medicines should also cover (I)VMP even if classical technology is applied but involving new approaches

## Strategic goal 3: Addressing emerging health threats and availability/therapeutic challenges (v)

| | Very important | Important | Moderately important | Less important | Not important |
|---|---|---|---|---|---|
| 40. Continue to promote the responsible use of antimicrobials and their alternatives | ○ | ◉ | ○ | ○ | ○ |

| | | | | | |
|---|---|---|---|---|---|
| 41. Coordinate Network activities to improve data collection on antimicrobial use in animals | ○ | ◉ | ○ | ○ | ○ |
| 42. Engage with stakeholders to minimise the risks of antiparasitic resistance | ○ | ○ | ◉ | ○ | ○ |
| 43. Promote and support development of veterinary vaccines | ◉ | ○ | ○ | ○ | ○ |

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**:

40.:  Several of the actions are very welcome, particularly bullets 3 and 6.

42.: the ‘moderate’ priority is given because although resistance is important for anthelmintics used for certain livestock species (e.g. sheep, horses), it is less important to many of the other antiparasitic classes where the extent of resistance is less or in fact none is detected. In addition, in most cases antiparasitic resistance has no consequences for public health.

43.: This is very welcome.
“Clarify the criteria required for field efficacy trials” would be better phrased as “clarify criteria for field trials and when efficacy field trials are needed”

## Strategic goal 4: Enabling and leveraging research and innovation in regulatory science (v)

| | Very important | Important | Moderately important | Less important | Not important |
|---|---|---|---|---|---|
| 44. Develop network-led partnerships with academia to undertake fundamental research in strategic areas of regulatory science | ○ | ○ | ○ | ◉ | ○ |
| 45. Leverage collaborations between academia and network scientists to address rapidly emerging regulatory science research questions | ○ | ○ | ◉ | ○ | ○ |
| 46. Identify and enable access to the best expertise across Europe and internationally | ◉ | ○ | ○ | ○ | ○ |
| 47. Disseminate and share knowledge, expertise and innovation across the regulatory network and to its stakeholders | ○ | ◉ | ○ | ○ | ○ |

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**:

44.: There is a lot of discussion around partnering with academia, and much less for practical implementation at the farm or vet clinic level.
One may have to come before the other but developments that cannot be implemented in the field are of little value; we. The agency should not lose sight of the need for applied science in product development research.

45.: only “academia and network scientists” is too restrictive and may be missing knowledge about the true resources/means available in veterinary world; compared to human medicine or ‘pure’ science research (“like to know” and “need to know”). Industry has an important contribution to make here as well.

46 and 47.: this will become increasingly important with the development of novel technologies and novel therapies

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