

# 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](mailto: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

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### 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

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

**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.*

IDF Europe agree with the proposed strategy the EMA has outlined but would like to see work done in relation to how parameters such as quality of life can be better integrated into the evaluation of areas like health and technology assessment.

Non Communicable Diseases without a shift of focus from individual diseases must also be mentioned and tackled in the strategic framework an goals also in focus EMA as diabetes and other NCDs are a huge human and economical burden and a major threat to the wellbeing of the European citizens

**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)

21. Promote the availability and uptake of biosimilars in healthcare systems

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.

Further promotion and uptake of 'high-quality' biosimilars can potentially help address the issue of access of insulin in many European countries. Nevertheless, currently there remains a knowledge gap for both patients and healthcare professionals on the pharmacokinetics and pharmacodynamics as well as the safety and efficacy in comparison with the reference product. Additionally we need comprehensive data on interchangeability in practice, pharmacovigilance and post-marketing surveillance.

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.

Currently the HTA systems in the EU are rather fragmented and in spite of the recently approved HTA legislation, it is expected that the national agencies would need time and resources to streamline the process of joint clinical assessments. However, patients and healthcare professionals would like to see the timely access to innovative medicines, and therefore we would like to witness EMA working more closely with the HTA to speed up the process.

Third choice (h)

10. Develop the regulatory framework for emerging digital clinical data generation

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.

Although there is rapid trend of new medical devices and ehealth systems of data collection, as well as various clinical data registries, there is a lack of standardization and interoperability among the different systems. Apart from privacy concerns and misuse of patients' data by the industry, a regulatory framework that is in place can facilitate not only data exchange and research exploitation, but also safeguarding the good and efficient use of digital clinical data.

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

- restoring trust between health technology companies and the rest of the society;
- taking into account the experiences of users of these health technologies;
- improving the system of pharmacovigilance and materiovigilance;
- providing the data needed to adjust the price according to the results of real-life studies

**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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4. Facilitate the implementation of novel manufacturing technologies	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
9. Foster innovation in clinical trials	<input checked="" type="radio"/>	<input 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12. Invest in special populations initiatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13. Optimise capabilities in modelling and simulation and extrapolation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
14. Exploit digital technology and artificial intelligence in decision-making	<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:**

10. Develop the regulatory framework for emerging clinical data generation  
 There is a need to better understand the ownership of these data collected and who are the authorities safeguarding the correct use as well as mechanism of storage of the data repository. It is also important to consider the option of OPEN data for the transparency of the research process and the researcher.

12. Invest in special populations initiatives  
 With more and more older patients having multi-comorbidities, it is crucial to understand how this sub-population can be managed in a sustainable way.

14. Exploit digital technology and artificial intelligence in decision making  
 For the sustainability of our healthcare systems, it will be important to identify 'high-risks' groups in early detection of diseases, complications and multi-comorbidities.

**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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 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:**

17. Reinforce patient relevance in evidence generation

As an organization representing patients living with diabetes, we believe in the valuable input of patients in generating evidence for medicines, not only on the safety and efficacy, but also on the long-term side effects and the consequence on quality of life.

**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 type="radio"/>	<input checked="" 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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
26. Support innovative approaches to the development and post-authorisation monitoring of vaccines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
27. Support the development and implementation of a repurposing framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 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 checked="" type="radio"/>	<input 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:**



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 \(https://www.ema.europa.eu/en/regulatory-science-strategy-2025\)](https://www.ema.europa.eu/en/regulatory-science-strategy-2025)

### **Background Documents**

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

### **Contact**

RegulatoryScience2025@ema.europa.eu