

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

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.

The goals do not mention the importance of post-marketing surveillance or reporting and the ways in which routine clinical data collection could be used to strengthen and improve the provision of this type of information.

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.

Currently the regulation of medical devices is extraordinarily weak. The fact that evaluations are carried out by commercial concerns which have a clear conflict of interest between assessing a device and receiving repeat business from the manufacturer means that one can have no confidence at all in the quality of medical device evaluations. The fact that a device may be approved by a relatively obscure company in one part of the EU and can then be marketed throughout the whole of the EU is also a major cause for concern.

Second choice (h)

17. Reinforce patient relevance in evidence generation

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.

It is clear that, in the past, too little attention has been paid to patient-reported outcomes (PROs) and to patient preferences in treatment choice. These ideas need to be at or near the top of the list when it comes to the evaluation of new medicines.

Third choice (h)

18. Promote use of high-quality real world data (RWD) in decision-making

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.

It is particularly important, as the document says, to "create a sustainable, quality assured, flexible framework delivering rapid access to and analysis of representative, longitudinal RWD throughout a product's life cycle". Drug and device evaluation must not end at the point at which the product is released onto the market.

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

No

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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>
4. Facilitate the implementation of novel manufacturing technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 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 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:

Regarding item 4, it does not seem to us that it is part of the EMA's job to facilitate the implementation of novel manufacturing technologies - there is a clear risk of a conflict of interests if you do this.

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	<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 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 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:**

It is important to optimise capabilities in modelling and simulation and extrapolation, especially as regards international harmonisation of methods and standards.



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

21. Promote the availability and uptake of biosimilars in healthcare systems	<input 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 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:**

It is important to contribute to HTAs' preparedness and downstream decision-making for innovative medicines, especially as regards discussing with HTAs guidance and methodologies for evidence generation and review, and also contributing to the identification of priorities for HTAs.

Bridging from evaluation to access through collaboration with payers - this is moderately important. It is certainly desirable to clarify the treatment-eligible patient population included in the labelling, and its scientific rationale.

Reinforcing patient relevance in evidence generation is very important - indeed, it is to be hoped that the importance of making this a priority is self-evident.

Promoting the use of high-quality real world data (RWD) in decision-making is important, especially as regards using electronic health records and other routinely collected clinical care data to create a 'learning regulatory system'.

Developing network competence and specialist collaborations to engage with big data is moderately important: it would certainly be useful to harmonise data standards, define and characterise data quality and provide regulatory guidance as to acceptability of evidence.

There is a strong element of 'motherhood and apple pie' about the recommendation to develop external communications to promote trust and confidence in the EU regulatory system.

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

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	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 type="radio"/>	<input type="radio"/>
24. Continue to support development of new antimicrobials and their alternatives	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 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:**

As regards promoting global cooperation to anticipate and address supply challenges, we especially support your suggestion for international harmonisation of regulatory science standards for complex generic medicines addressing bioequivalence, waivers and modelling.

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

Leveraging collaborations between academia and network scientists to address rapidly emerging regulatory science research questions this is moderately important - in particular, we support the idea of training early-career researchers in regulatory science.

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

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