

COMBINE programme ACT EU Multi Stakeholder Platform Advisory Group meeting

12 March 2025

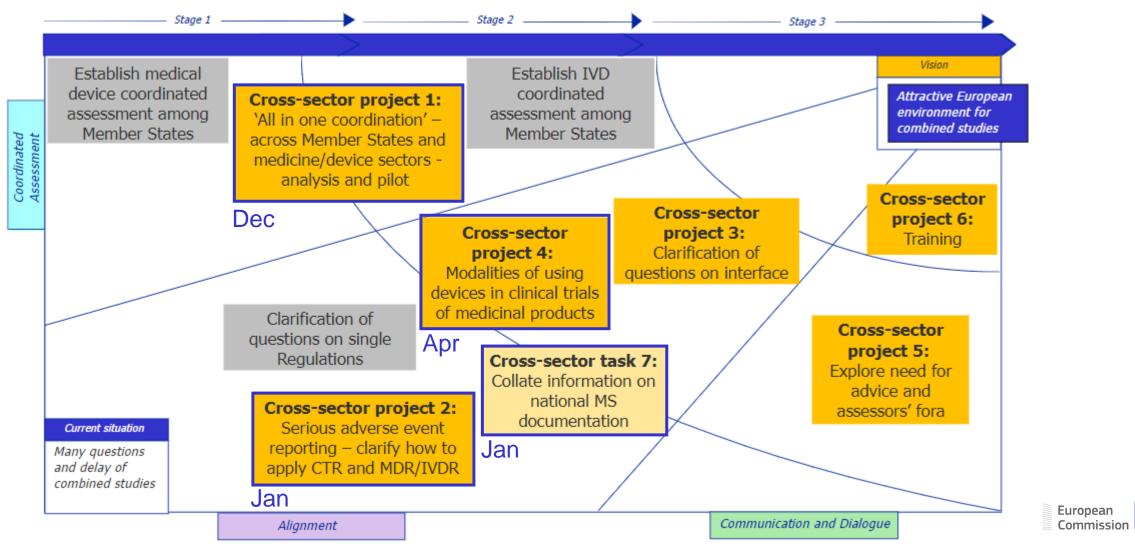
Isabelle Clamou, Unit D.2 – Medicinal Products : Quality Safety , Innovation Directorate-General for Health and Food Safety (DG SANTE) European Commission

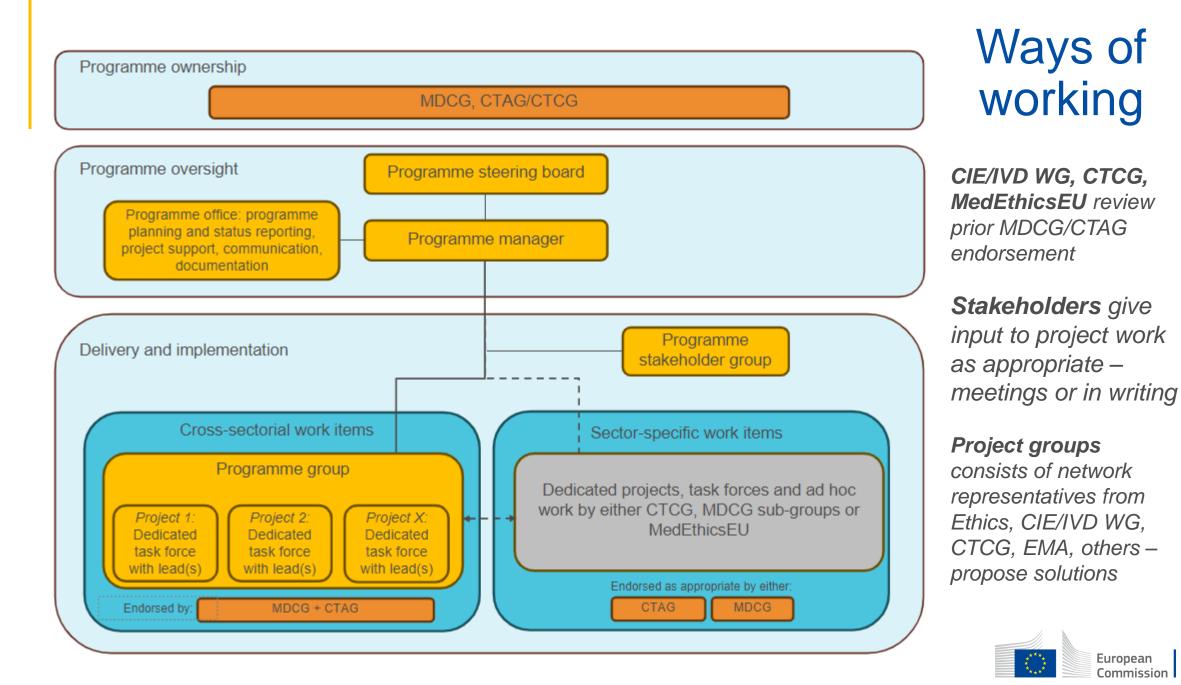
Update since October 2024

- ACT EU MSP workshop October 2024 :
 - From project to programme
 - Presentation of the draft programme strategy
- December 2024:
 - Adoption of the programme strategy by COMBINE governance
 - Kick off of cross functional projects



Transformation diagram – programme overview





European Commission

Stage 1 projects



Project 1: 'All in one' assessment under CTR/IVDR/MDR

Cross-sector project 1: 'All in one coordination' – across Member States and medicine/device sectors analysis and pilot

Purpose: to explore coordinating Member State assessments of applications for studies among Member States (including competent authorities and ethics committees) and across the CTR and IVDR or MDR. Focus on CT of a medicinal product combined with PS of a companion diagnostic IVD.

• Expected deliverables:

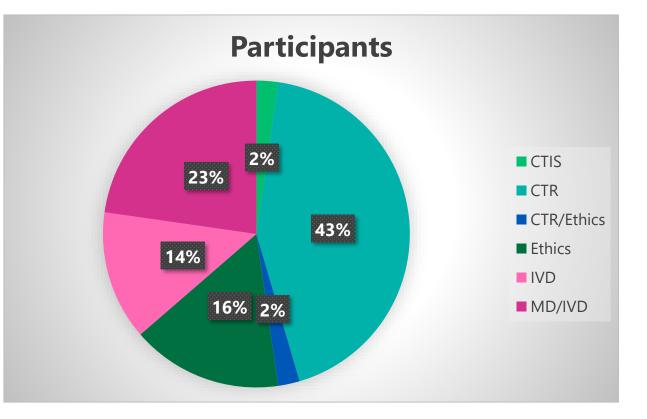
- Analyse possibilities for a voluntary multi-Member State CT/PS single procedure
- Propose outline of a single procedure pilot
- Establish and run pilot
- Evaluate the results of the pilot and draw up recommendation for a voluntary single procedure for CT/PS and CT/CI combined
- Convey learnings on IT business procedures

Project group 1 initiated Dec 2024:
14 Member States + EMA
44 participants across Ethics, CA CT/IVD/MD



Project 1

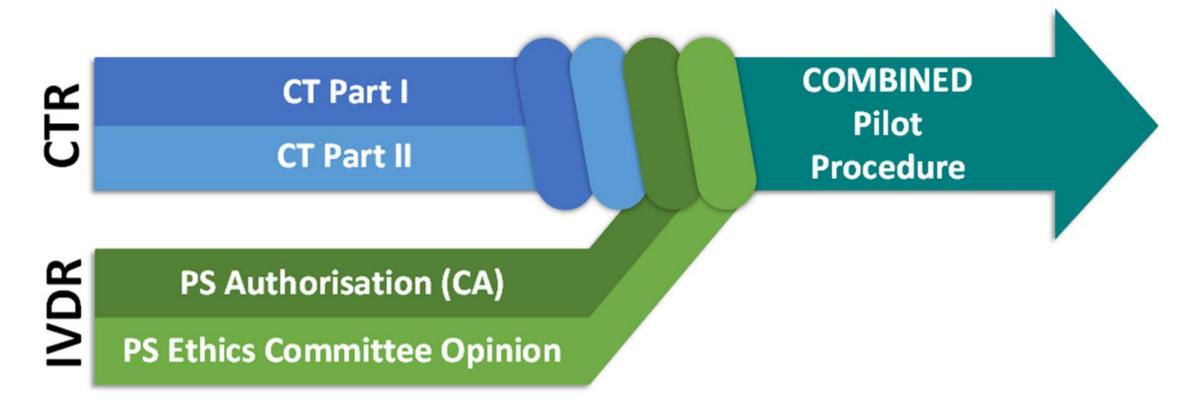
- Launched in December 2024
- Analysis work underway since Q2 2024.
- Discussions to date explored
 - Legal frameworks and current practice for CTR/IVDR
 - Similarities and differences
 - What could a pilot look like?
 - Challenges and aspects for clarification



Project 1 Group as of 24/01/25

- 44 participants
- 14 MS + EMA

Targeted Approach – CT + PS of IVD companion diagnostic



Pilot Key Features

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Single submission consisting of a parallel submission of:

CT documentation PS documentation EC documentation for the CT EC documentation for the PS. Coordinated RFI for CT and PS Coordinated response from sponsor to the RFI

Alignment of decisions

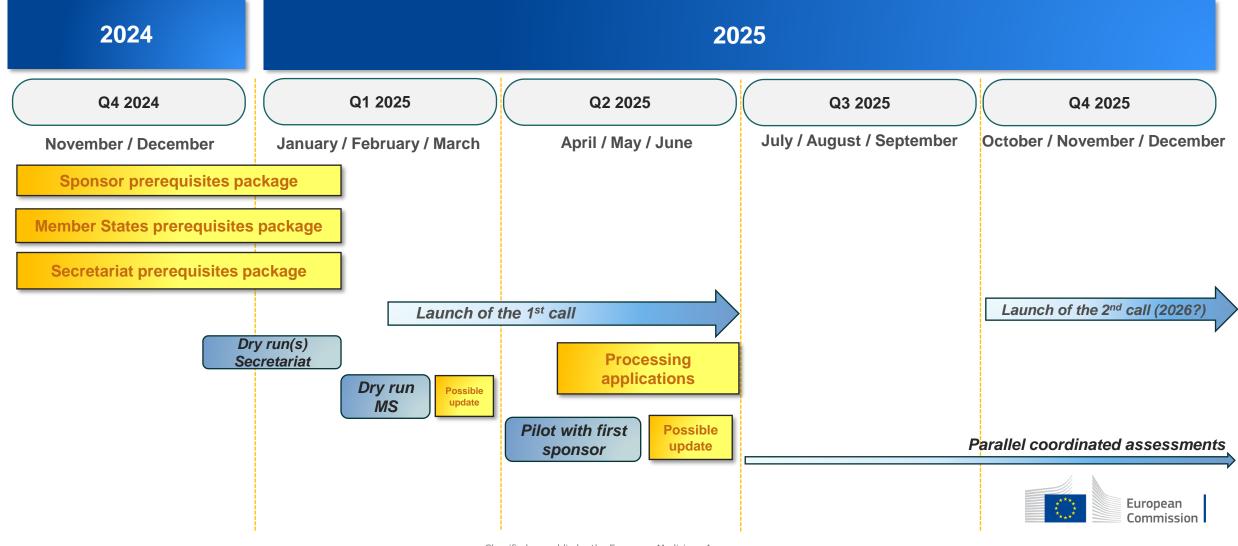
Goal: To have questions raised together

Goal: To have information/ changes to documentation occurring at the same time

Goal: Decisions/ opinions provided together

Medical device clinical investigation coordinated assessment pilot

Establish medical device coordinated assessment among Member States



Classified as public by the European Medicines Agency

Project 2: 'Serious adverse event reporting across CTR/IVDR/MDR'

Cross-sector project 2: Serious adverse event reporting – clarify how to apply CTR and MDR/IVDR

Purpose: to clarify how to apply the CTR, MDR and IVDR requirements to serious adverse event reporting in combined studies

- Expected deliverables:
 - Comparison of safety reporting procedures under each of the three legal frameworks and understanding of practical experience from stakeholders.
 - Suggestion for solution of any identified issues e.g. a guidance document text.





Project initiation Feb 2025

Project 4: 'Modalities of using devices in clinical trials of medicinal products'

Purpose: to explore the **different modalities** of using medical devices and IVDs in clinical trials of medicinal products -> clarify applicable **regulatory context**.

- Expected deliverables:
 - A set of scenarios for using and/or investigating medical devices and IVDs in clinical trials of medicinal products
 - Clarification of the regulatory framework applicable to each scenario

If appropriate, a guidance document or similar

One possibility is update/expansion of MDCG 2022-10.

Project expected initiated Apr 2025 – stage 1.



project 4: Modalities of using devices in clinical trials of medicinal products

Cross-sector

Task 7: 'Info on national requirements'

Purpose: to 1) take stock of feedback from stakeholders on different Member State practices for documentation and 2) facilitate sponsor access to this information.

Expected deliverables:

- Collation and review of feedback from stakeholders from analysis
 phase on different Member State practices on documentation
- Communication to Member States to encourage easy access to information for sponsors (website)
- Collection and publication of a **set of links to national websites** with requirements for combined studies

Task initiated Q1 2025 and performed by Commission.







Stage 2 projects



Project 3: 'Questions on interface of CTR, MDR and IVDR'

Purpose: to clarify questions on aligned application of CTR and MDR or IVDR as regards application and/or notification processes for combined studies, for elements that are on the interface of these Regulations.

Expected deliverables:

- List of questions that need clarification and assessment of priority
- Guidance text or similar tool to clarify some or all questions



Cross-sector project 3: Clarification of questions on interface



Project 5: 'Explore need for advice and assessors' fora'

Purpose: to explore needs and opportunities for offering advice to sponsors, and for exchange of best practice among assessors.

Expected deliverables:

- Clarify sponsor needs for advice, assessment of what already exists, and proposals to fill gaps
- Same as above for competent authority and ethics committees' needs for fora to exchange experience and best practices







Stage 3 project



Cross-sector project 6: Training

Project 6: 'Training'

Purpose: explore the needs for training for sponsors, competent authorities and ethics committees, collect existing training materials or develop new materials as appropriate.

Expected deliverables:

- Identification of training needs
- Collection of existing materials
- Development of a lean training strategy
- Development any necessary new training materials





Outlook - programme approach



- Brings parties together across sectors
- Active participatory roles, intended to address needs
- Aims to facilitate implementation
- Tests new ways of working
- Will inform possible future policy development
- Stage 1 underway with coordinated assessment as centerpiece

More information:

Combined studies - European Commission (europa.eu)





Thank you

Any questions?

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