European Commission

EMA
EUROPEAN MEDICINES AGENCY

HMA
Heads of Medicines Agencies

Monitoring the European clinical trials environment

A deliverable of the ACT EU Priority Action 2

October-December 2025

An agency of the European Union

Clinical Trials in the EU/EEA

October-December 2025

685

Submissions

289 Multinational	
22 Non-Commercial	**267** Commercial
396 Mononational	
247 Non-Commercial	**149** Commercial

569

Authorised

261 Multinational	
25 Non-Commercial	**236** Commercial
308 Mononational	
184 Non-Commercial	**124** Commercial

The metrics in this report provide information on the trend of the clinical research environment in the European Union (EU) and European Economic Area (EEA). The numbers used are based on data retrieved from the Clinical Trials Information System (CTIS) for clinical trials regulated under the regime of the Clinical Trials Regulation (EU) No 536/2014 (CTR).

The data set for this report shows data for the months October-December 2025, as of 31 December 2025, as well as cumulative numbers since the launch of CTIS on 31 January 2022. According to Article 98 Clinical Trials Regulation (EU) 536/2014, the transition period finished the 30 January 2025.

In Q4 2025, an average of 211 new clinical trial applications were submitted per month in CTIS. The median time from submission to decision for new initial clinical trial applications is 108 days[1].

[1] The applications could be affected by the "winter clock stop" and by the Regulation (EEC, EURATOM) No 1182/71 of the Council of June 1971, determining the rules applicable to periods, dates and time limits. (Available at: https://eur-lex.europa.eu/legal). The "winter clock stop" for the Clinical Trials Information System (CTIS) refers to a designated period during the winter holidays when regulatory timelines are paused. This allows regulatory authorities and sponsors to manage workloads effectively during the holiday season, ensuring that deadlines do not coincide with staff leave periods. Due to this winter clock stop, the timelines for the applications may be affected.

A total of 13,110 clinical trial applications have been submitted since the launch of CTIS *(for more details, please refer to the metric "Clinical trials per applicable statuses")*.

At the time when the report is generated, more than 6,110 initial clinical trials are ongoing in EU/EEA under the CTR.

The therapeutic area mostly investigated is Neoplasms (Tumour).

Contents

Chapter 1

Submitted initial clinical trial applications

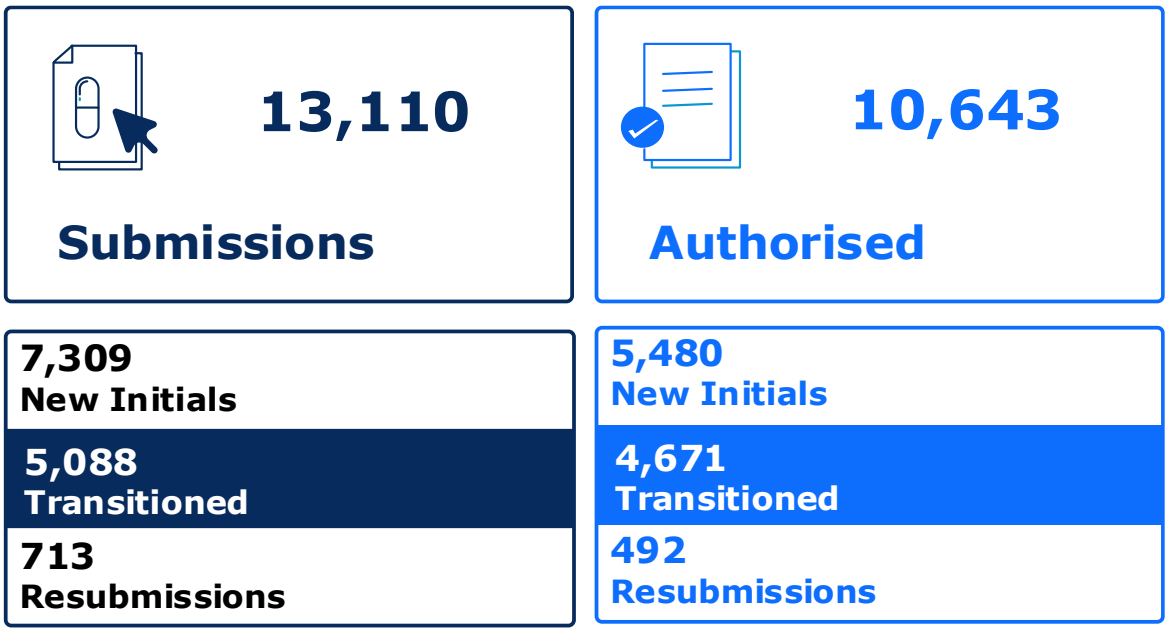
Chapter 1 of this report provides information on **submitted** initial clinical trial applications (CTAs), presented on the applicable statuses.

For detailed information on **authorised** clinical trials please refer to chapter 2 of this report.

Initial clinical trial applications are those applications:

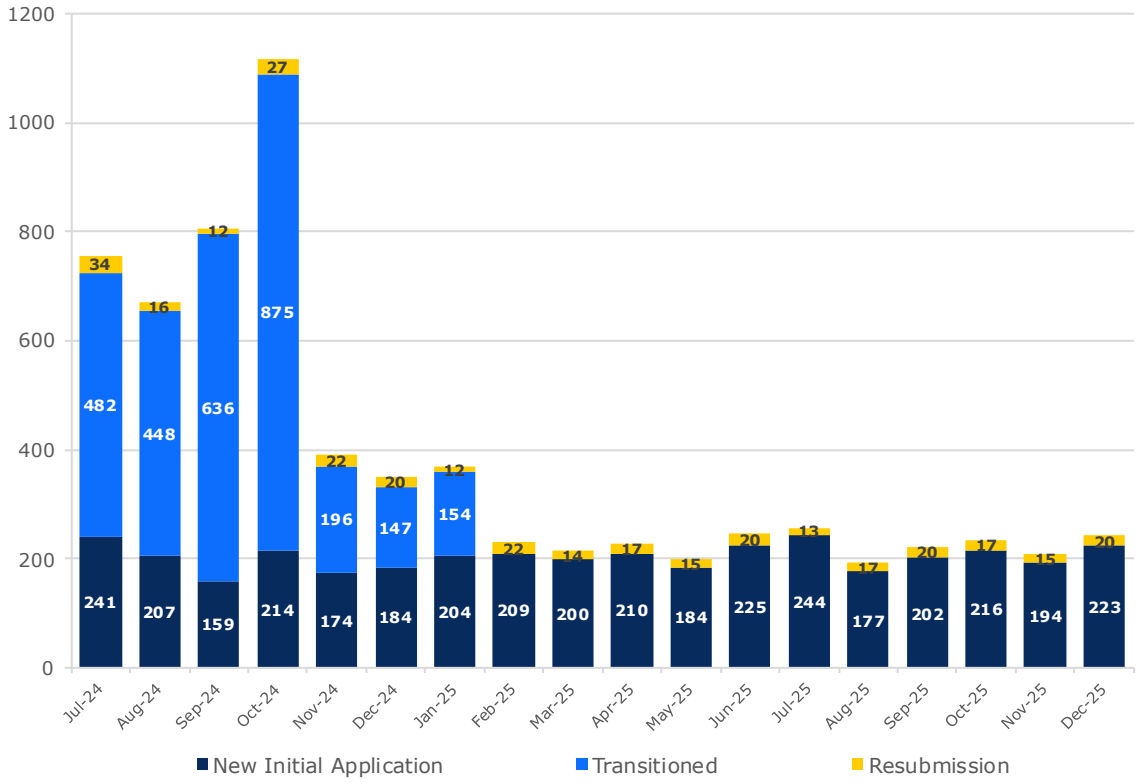
- new initial clinical trial applications submitted in CTIS by the sponsors under the Clinical Trials Regulation (EU) 536/2014 (CTR);
- trials which were already authorised under the regime of Clinical Trials Directive 2001/20/EC (CTD) and that have been transitioned to the regime of CTR;
- resubmitted initial clinical trial applications, which were previously either withdrawn, lapsed, or not authorised.

The overview below presents the **cumulative numbers** for initial clinical trial applications submitted since 31 January 2022 *(for more details, please refer to the metric "Clinical trials per applicable statuses")*.



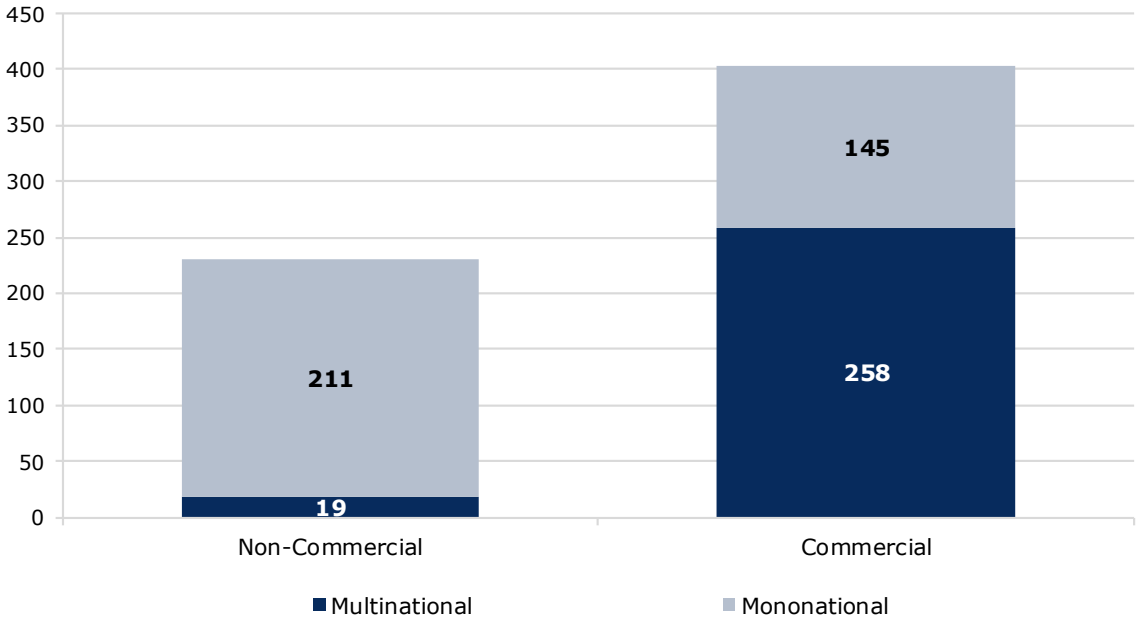
Monthly submissions of initial clinical trial applications

In October-December 2025, 685 initial clinical trial applications have been submitted, of which 633 new initial CTA and 52 are resubmissions of previously submitted initial applications. According to Article 98 Clinical Trials Regulation (EU) 536/2014, the transition period finished the 30 January 2025. *(the graph below shows the data for the last 18 months)*.



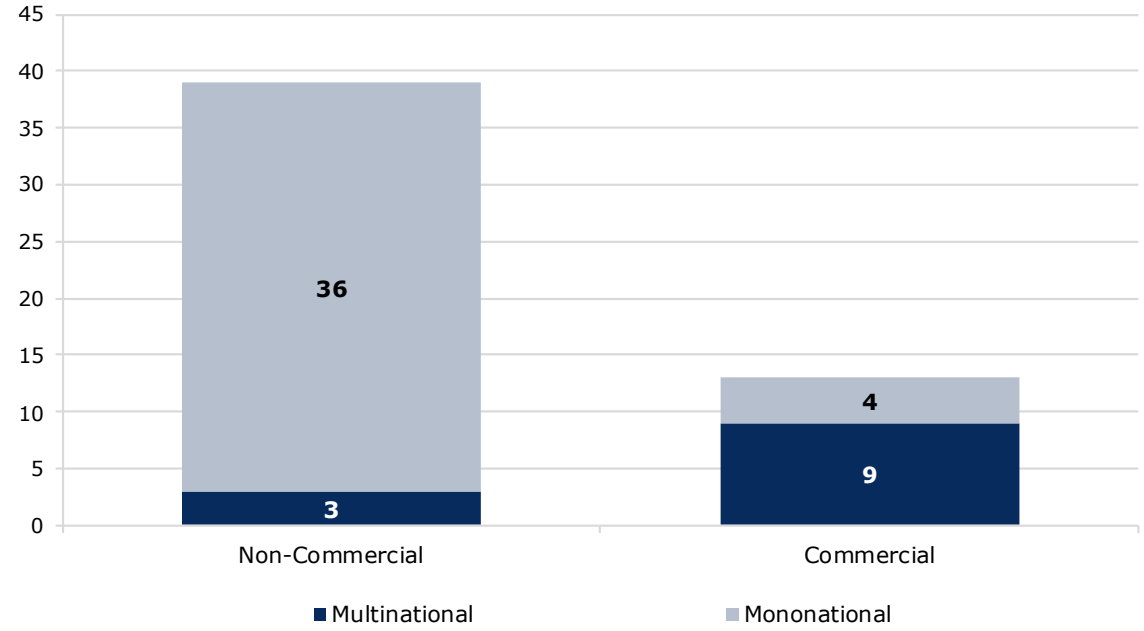
New initial clinical trial applications per sponsor type and mono- vs multinational trials

The graph below shows the split of submissions of new initial clinical trial applications in October-December 2025 into commercial/non-commercial sponsors and mononational versus multinational trials.



Resubmitted initial clinical trial applications per sponsor type and mono- vs multinational trials

The graph below shows the split of resubmitted initial clinical trial applications in October-December 2025 into commercial/non-commercial sponsors and mononational versus multinational trials.



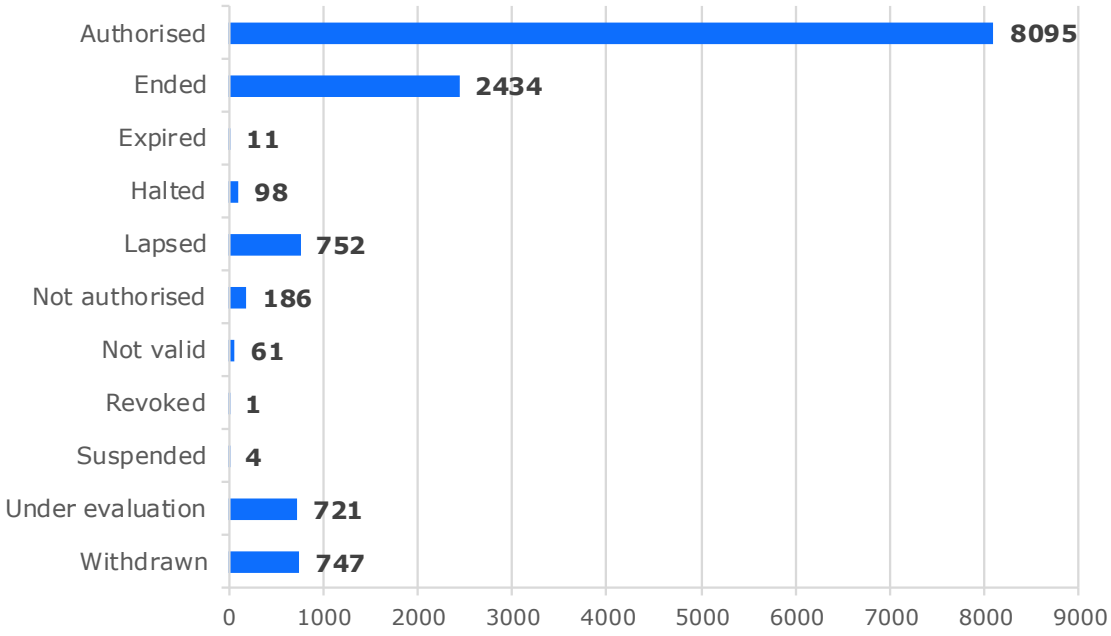
Clinical trials per applicable statuses

Since 31 January 2022, a total of 13,110 initial clinical trial applications have been submitted in CTIS.

The graph below shows the number of trials submitted since 31 January 2022 per applicable overall status at EU level. It should be noted that the status 'authorised with conditions' does not appear in the graph below as it is a status applicable **at the level of the Member States Concerned**.

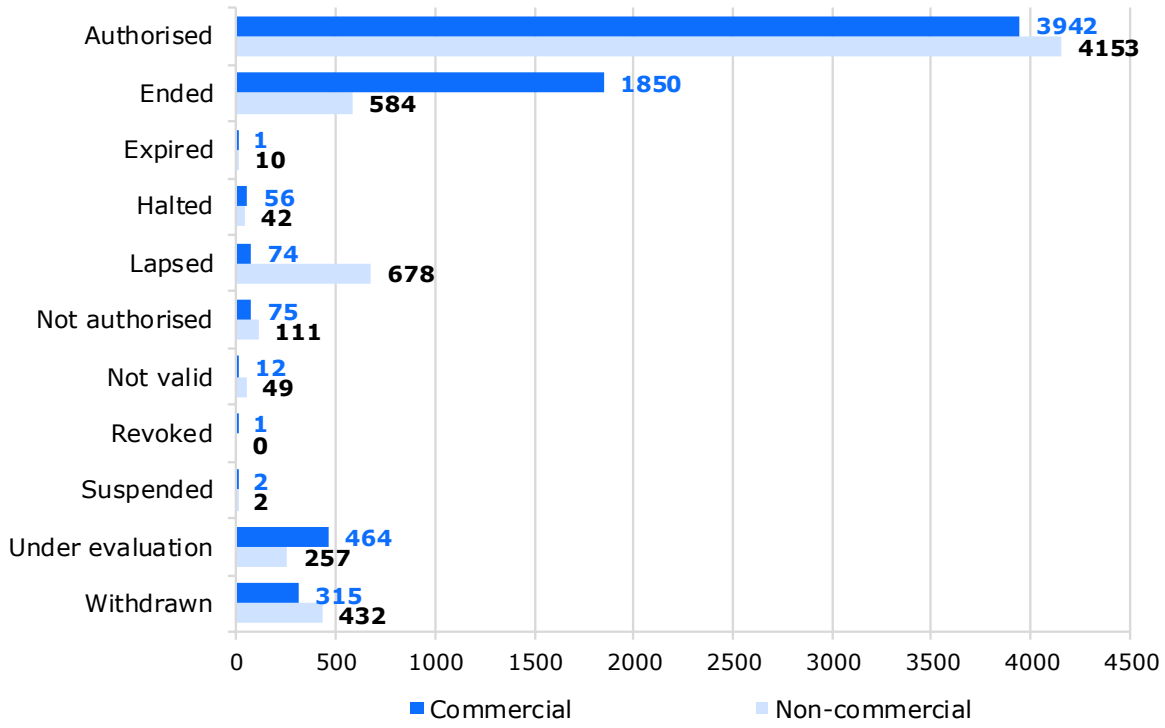
Clinical trials per applicable statuses

The graph below shows the status of each clinical trial as recorded in CTIS at the time when the report is generated.



Clinical trials classified per statuses and per sponsor type

The graph below shows the cumulative figure per status of each clinical trial as recorded in CTIS at the time when the report is generated, in combination with information on sponsor type.



Distribution of submitted new initial clinical trial applications per Member State Concerned

The overview below provides information on new initial clinical trial applications – full applications (part I and part II) or part I only – submitted since 31 January 2022 by looking at Member States involvement in mono/multi-national trials, as Reporting Member State (RMS)[2] and Member State Concerned (MSC). It is important to contextualise the number reported in the table vis-à-vis the Member States population [Statistics | Eurostat (europa.eu)].

[2] RMS is the Reporting Member State appointed in line with the requirements of Article 5 of the Clinical Trials Regulation (EU) No 536/2014.

Member State	Multinational Trials		Mononational Trials	Total number of Initial CTAs
	MSC	*Of which as RMS*		
Austria	514	78	69	583
Belgium	1016	168	304	1320
Bulgaria	543	16	44	587
Croatia	160	0	1	161
Cyprus	8	0	1	9
Czechia	796	128	87	883
Denmark	578	193	309	887
Estonia	81	11	8	89
Finland	211	65	62	273
France	1834	259	740	2574
Germany	1869	664	497	2366
Greece	516	4	37	553
Hungary	719	43	38	757
Iceland	12	0	2	14
Ireland	203	21	22	225
Italy	1763	235	293	2056
Latvia	95	8	8	103
Lithuania	116	14	4	120
Luxembourg	3	0	1	4
Netherlands	923	185	538	1461
Norway	236	43	78	314
Poland	1485	175	127	1612
Portugal	393	39	95	488
Romania	475	16	59	534
Slovakia	275	22	6	281
Slovenia	41	3	4	45
Spain	2297	628	585	2882
Sweden	439	98	163	602

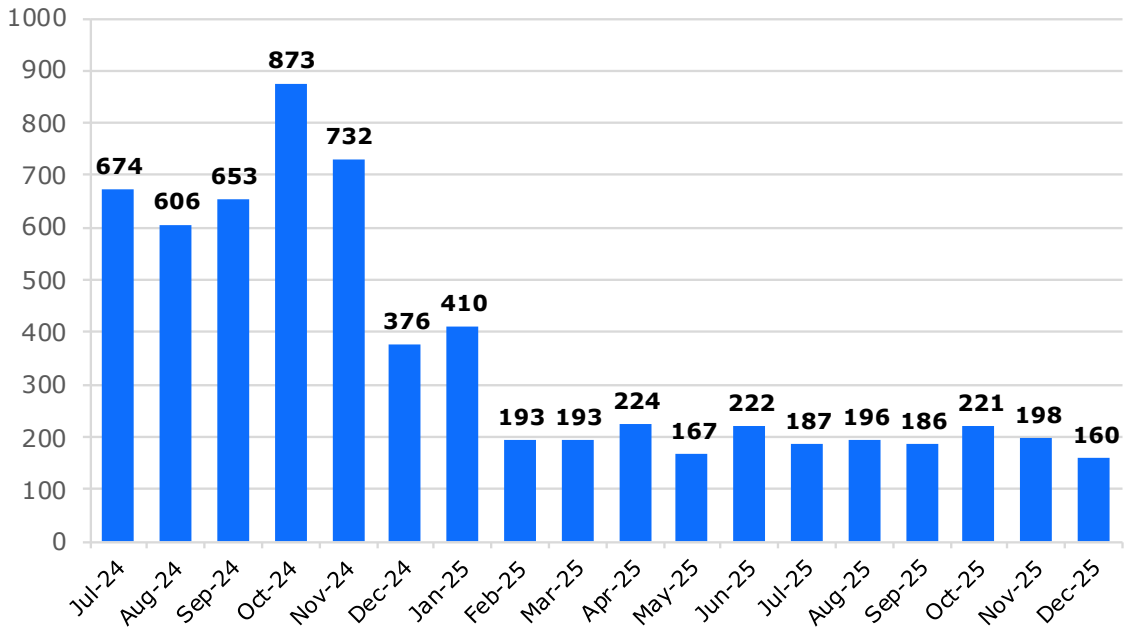
Chapter 2

Authorised clinical trials

Since 31 January 2022, a total of 10,829 have received a decision in CTIS, of which 10,643 received a positive decision authorising the clinical trial. The graph below includes figures on both authorised and not authorised clinical trials in the last 18 months.

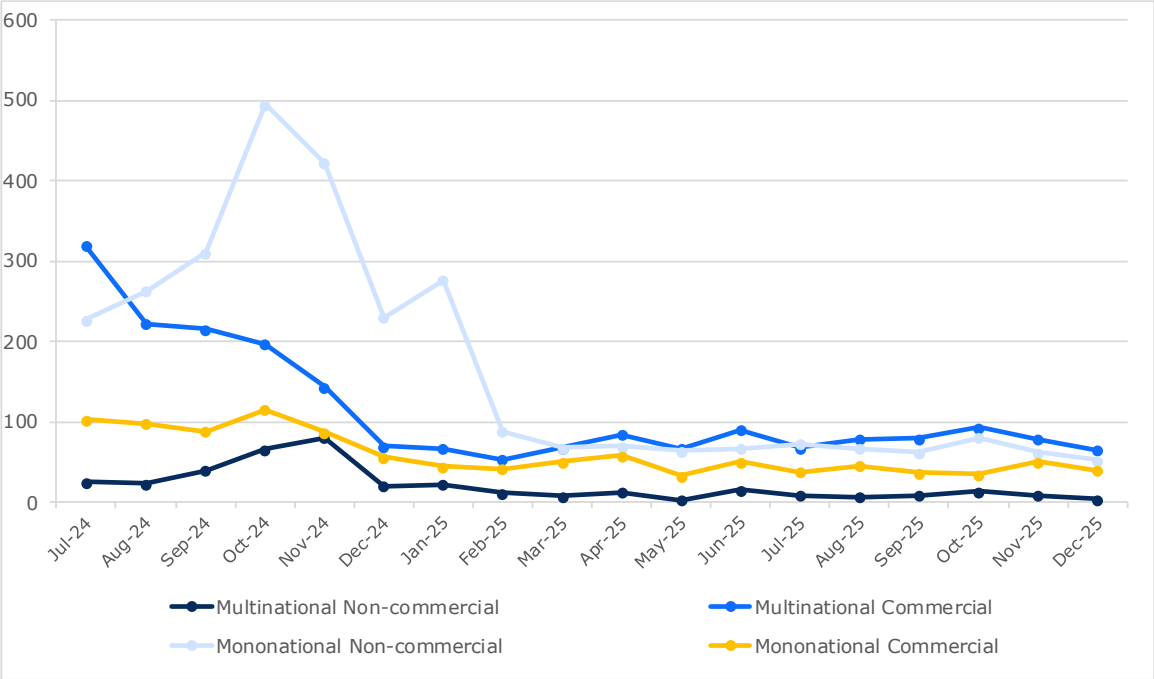
In October-December 2025, of the 579 initial clinical trial with a decision, 569 have been authorised.

The high number of decisions in 2024 is due to the high number of transitioning applications that were submitted before the end of the transitional period.



Mono- vs multinational trial, for which a decision has been issued, and in relation to the sponsor type

The graph below shows the number of trials for which, in the last 18 months, a decision has been issued in CTIS. The graph below includes figures on both authorised and not authorised clinical trials as well as commercial/non-commercial sponsor.

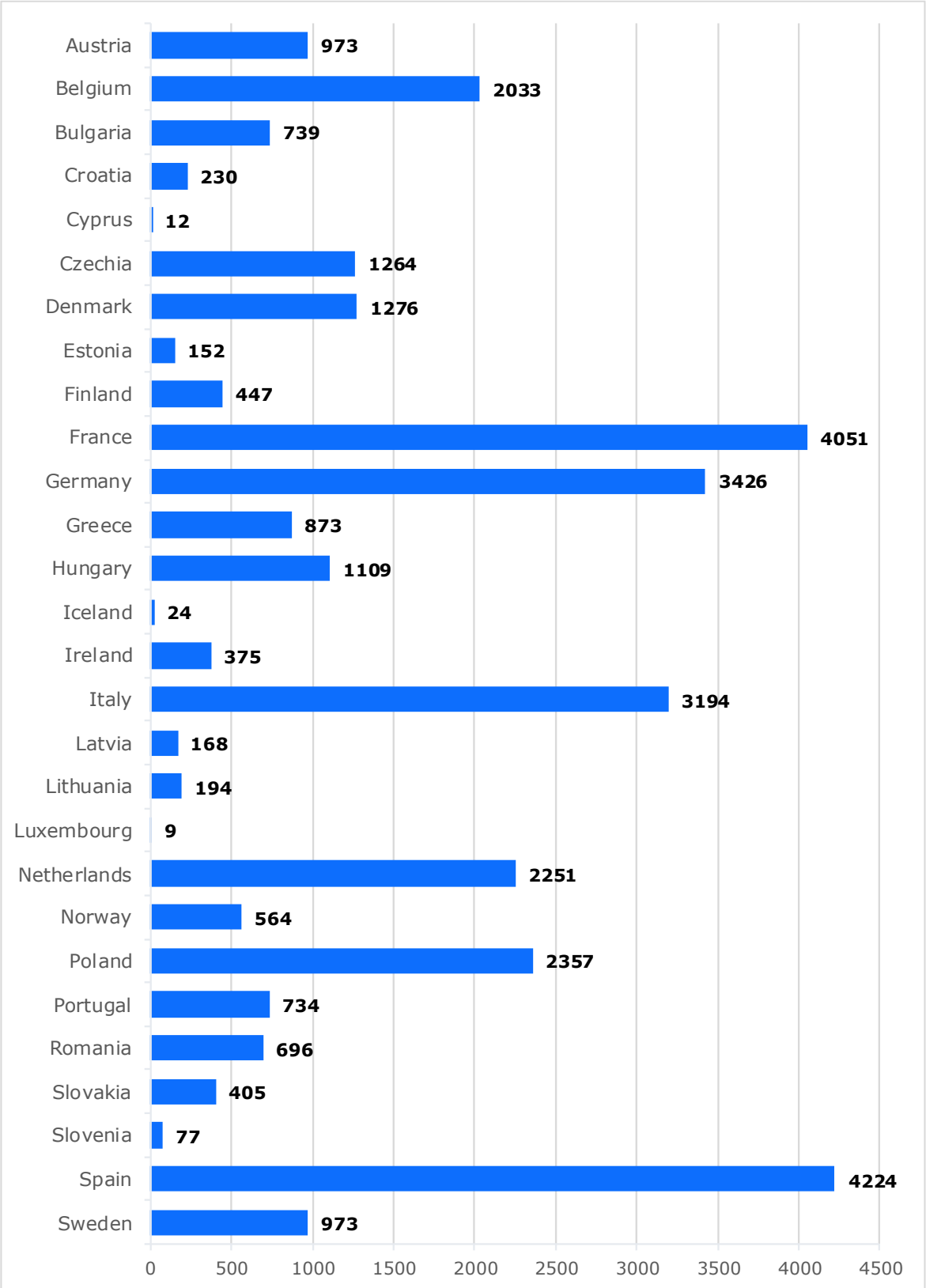


As of 31 December 2025, 4,847 multinational clinical trials have a decision in CTIS, with an average of 6 Member States Concerned.

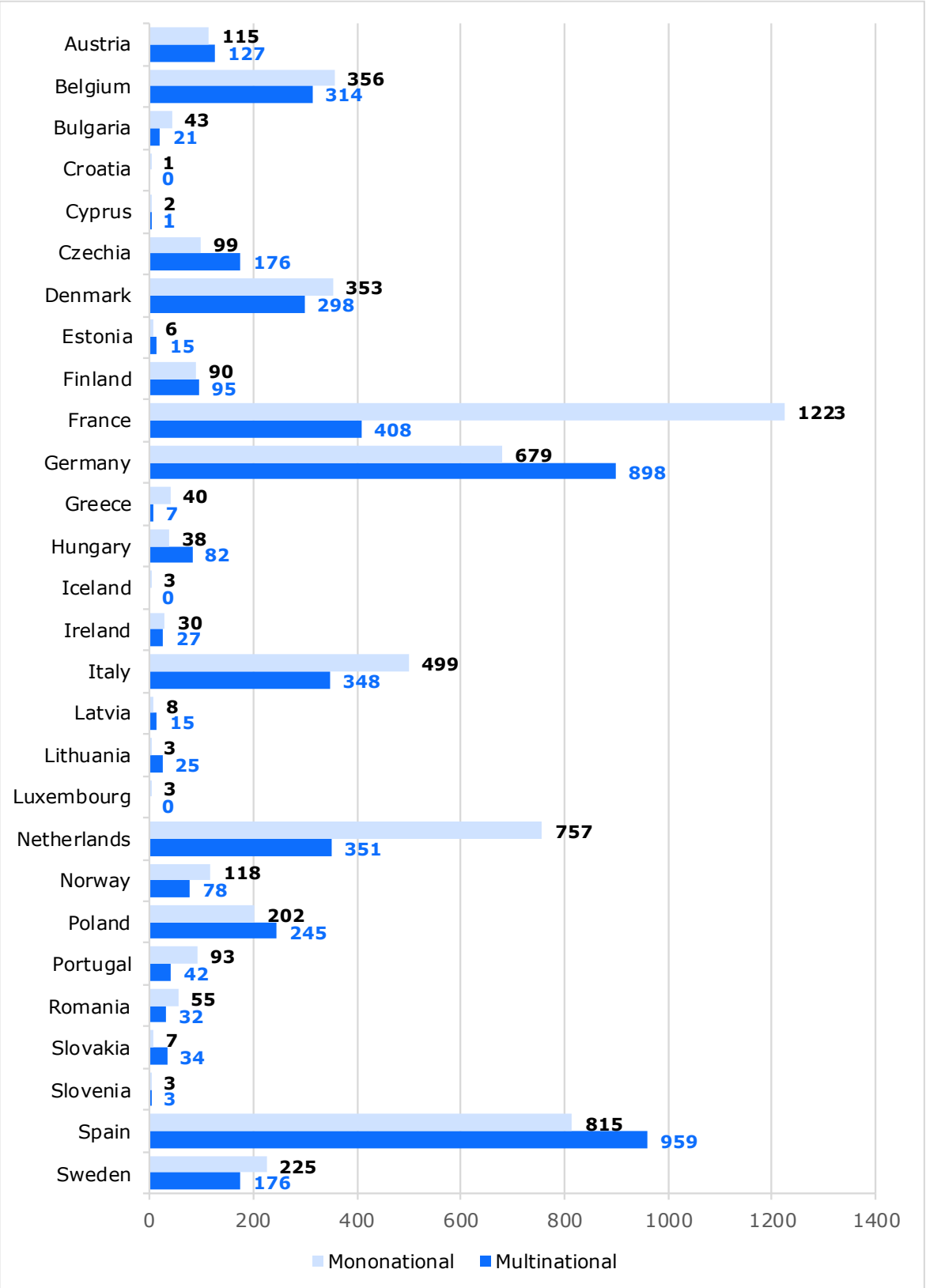
Distribution of **authorised** clinical trials per Member State Concerned and appointment of Reporting Member State

The graph below shows the number of clinical trials authorised since 31 January 2022. The figures indicate how many times a Member State has been involved as Member States Concerned[3] in an initial clinical trial application even if it has not authorised yet the trial in its country.

[3] In multinational clinical trials the same initial clinical trial application has been submitted to multiple Member State Concerned, and it is counted in the graph in each applicable MSC.



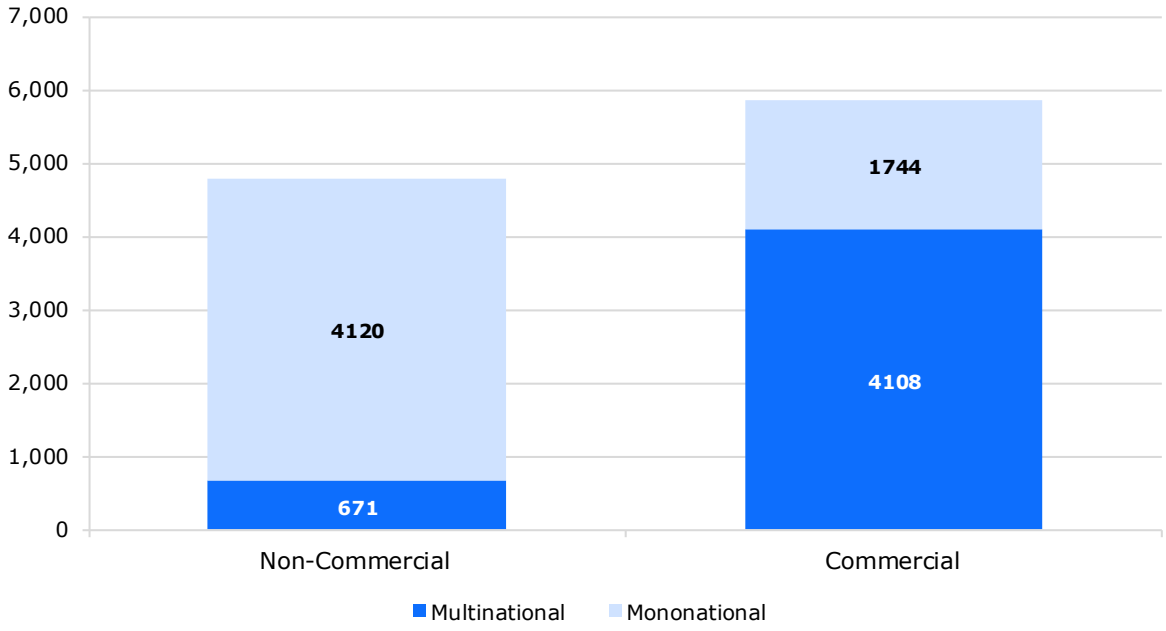
The graph below shows the distribution of appointment of Reporting Member State (RMS), amongst the applicable Member States Concerned, in authorised mono- and multinational trials.


Austria 115 127
Belgium 356 314
Bulgaria 43 21
Croatia 1 0
Cyprus 2 1
Czechia 99 176
Denmark 353 298
Estonia 6 15
Finland 90 95
France 1223 408
Germany 679 898
Greece 40 7
Hungary 38 82
Iceland 3 0
Ireland 30 27
Italy 499 348
Latvia 8 15
Lithuania 3 25
Luxembourg 3 0
Netherlands 757 351
Norway 118 78
Poland 202 245
Portugal 93 42
Romania 55 32
Slovakia 7 34
Slovenia 3 3
Spain 815 959
Sweden 225 176
0 200 400 600 800 1000 1200 1400
Mononational
Multinational

Authorised clinical trials, with information whether the trial is a mono- vs multinational and in relation to sponsor type

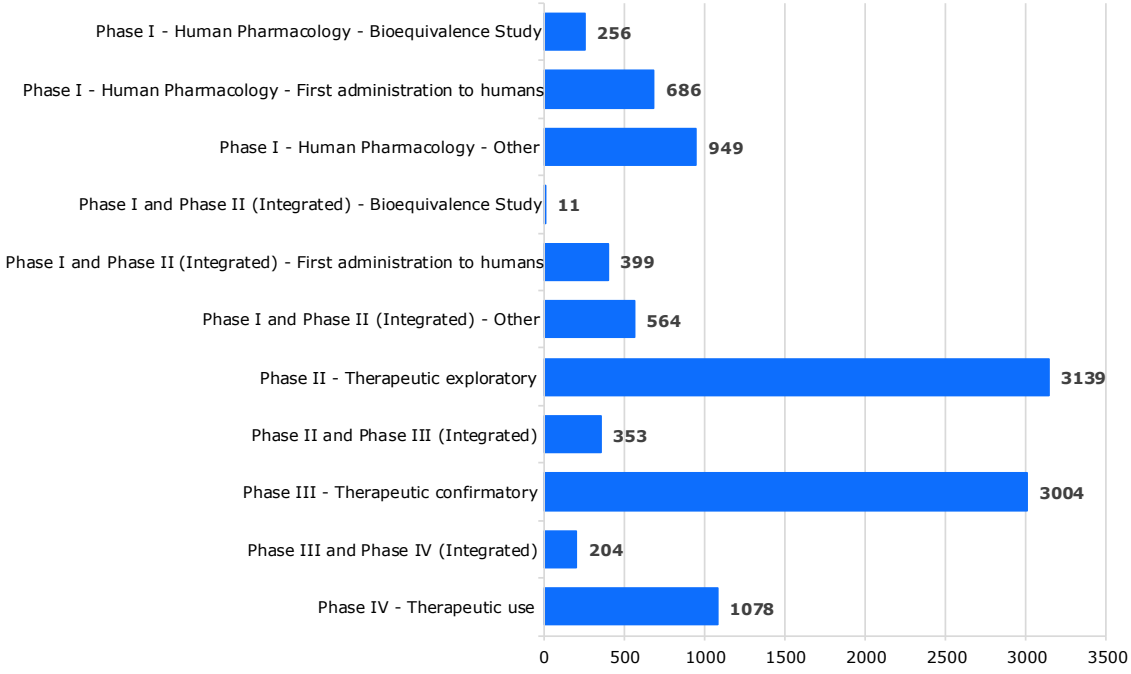
The graph below shows the number of clinical trials authorised since 31 January 2022, split into mono national/ multi-national and per sponsor type.

The graph shows a majority of mono-national CTs authorised conducted by non-commercial sponsors. On the contrary the majority of CTs authorised, conducted by commercial sponsors, are multinational.



Authorised clinical trials per phase (i.e. I, II, III, IV, as well as first in human clinical trials or combined phases early (I and II))

The graph below shows the number of clinical trials authorised since 31 January 2022, broken down per trial phase.



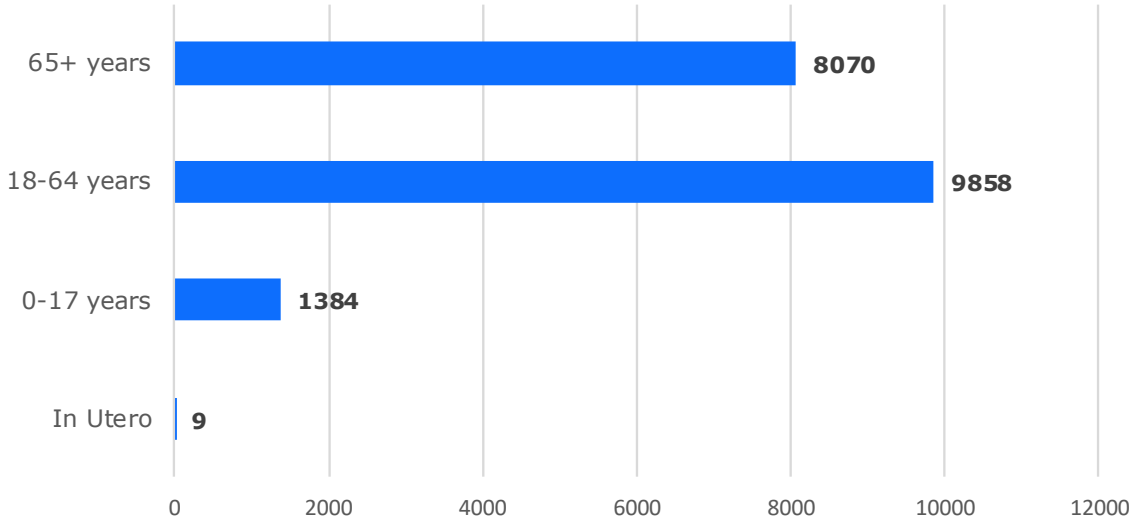
Clinical trials per population type and rare disease

As of 31 December 2025, 6,116 clinical trials were reported as ongoing in CTIS. The term 'ongoing' refers to clinical trials that have been authorised in at least one Member State Concerned where the recruitment of patients has started at the clinical investigator sites[4].

The graph below illustrates some features of the groups and subgroups of the clinical trial participants taking part in clinical trials that have been authorised in the EU/EEA.

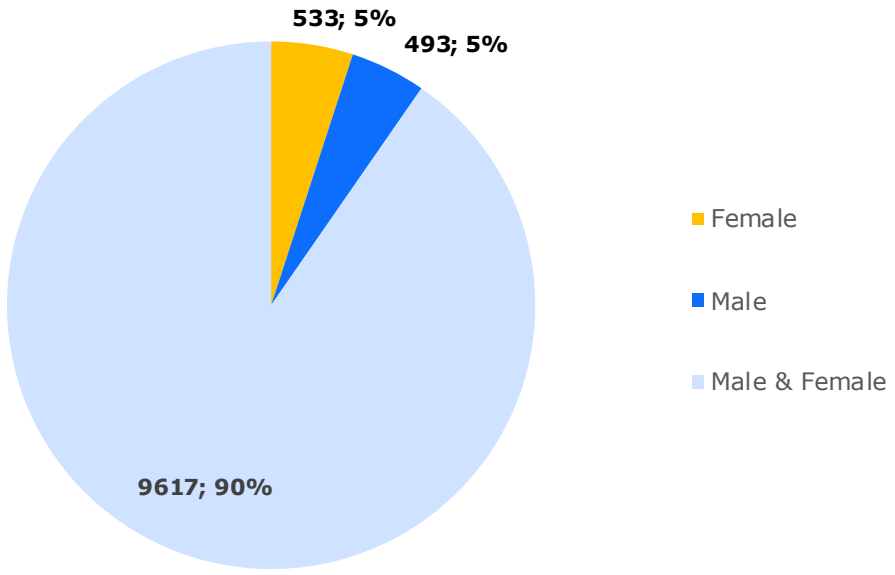
[4] Details on recruitment status are based on the information reported by the trial sponsor in CTIS.

By Age of clinical trials participants

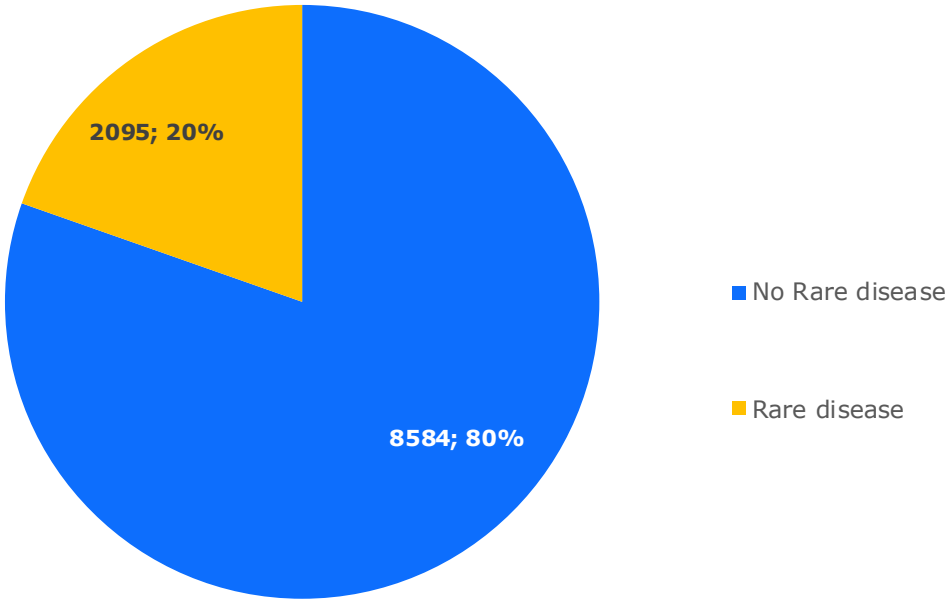


It is important to note that various age categories may be addressed in one clinical trial (e.g. a clinical trial may be for age "+65" as well as for age "18-64" and in this case it would be counted twice). Therefore, the reader should not sum the number of clinical trials for each age category and consider the total as the total of clinical trials.

By Gender of clinical trials participants



Clinical trials with rare disease participants

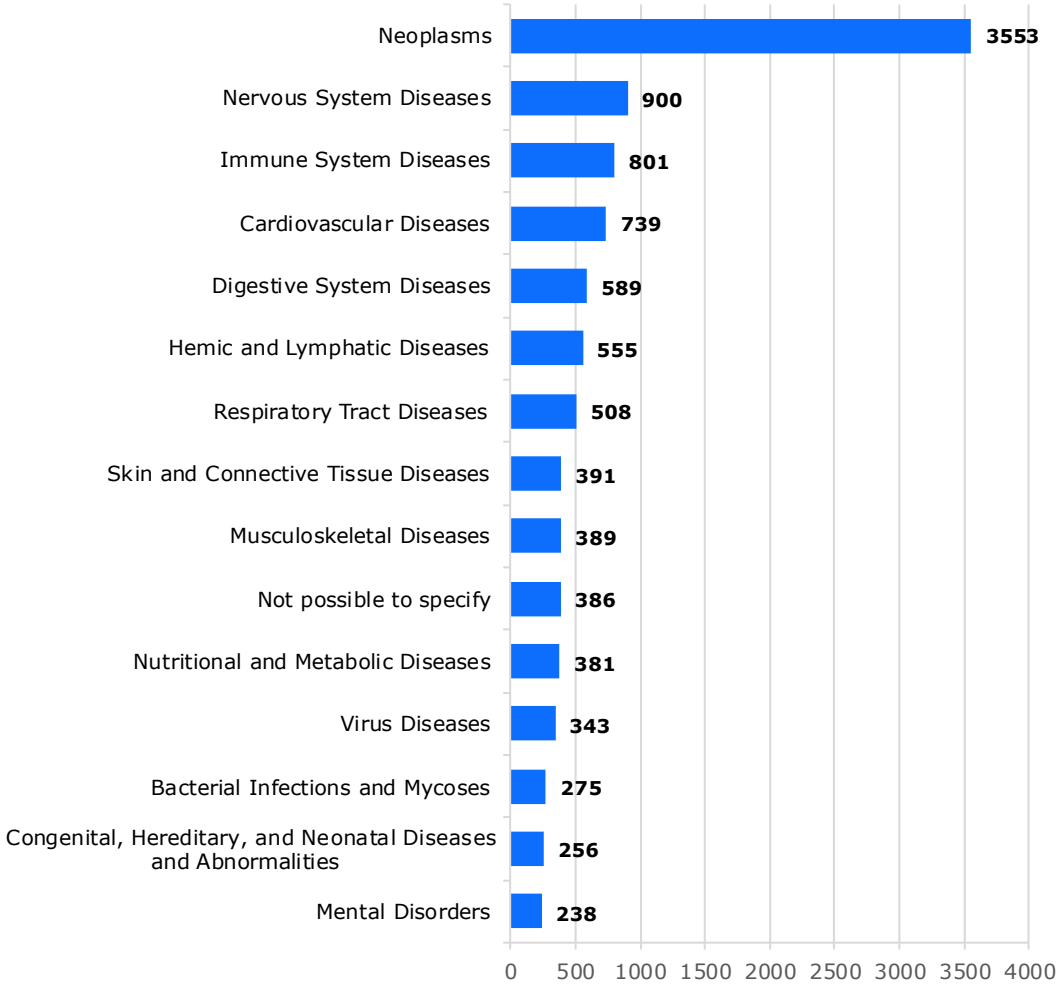


It is important to note that more than one disease could be investigated in one clinical trial (e.g., a clinical trial may be for a rare disease as well as for No rare disease and in this case it would be counted twice). Therefore, the reader should not sum the number of clinical trials for Rare disease/No Rare disease and consider the total as the total of clinical trials.

Authorised clinical trials per therapeutic area

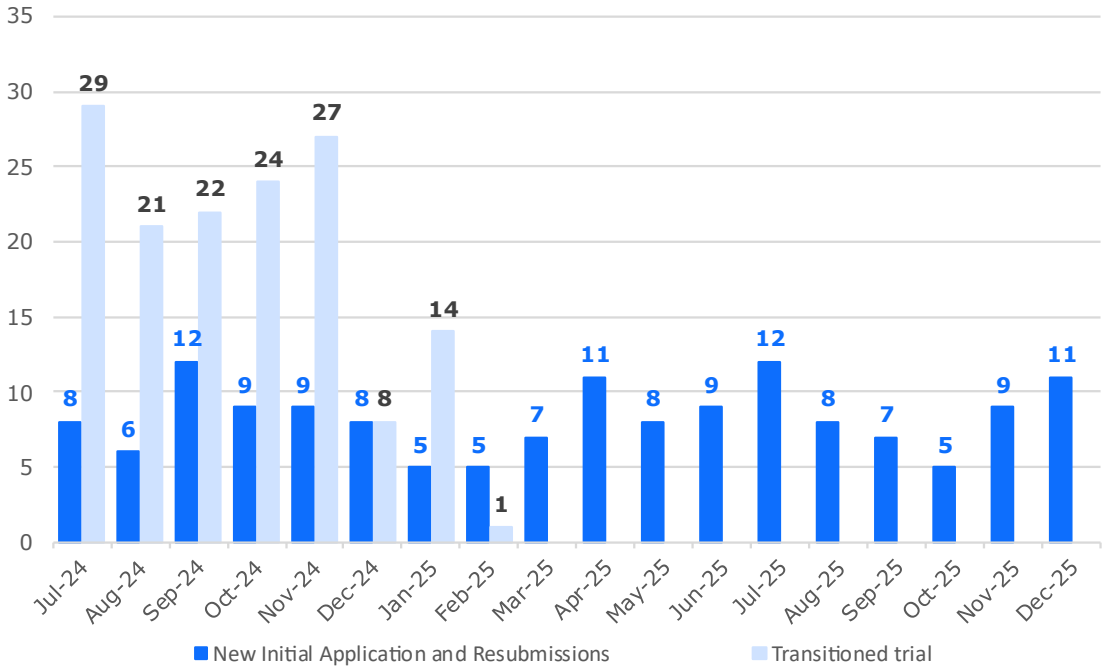
The graph below shows the number of clinical trials authorised since January 2022, broken down per therapeutic area[5], showing the most frequent 15 therapeutic areas.

[5] In case a clinical trial investigates several therapeutic areas, it is counted in each of such identified therapeutic areas.



Authorised clinical trials with an ATMP

Twenty-five clinical trials with an Advanced Therapy Medicinal Product (ATMP) have been authorised in October-December 2025, bringing the total of authorised clinical trials with ATMP to 465, as illustrated in the graph below *(the graph below shows the data for the last 18 months)*.


35
30
25
20
15
10
5
0
29
21
22
24
27
14
8
6
12
9
9
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5
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1
7
11
8
9
12
8
7
5
9
11
Jul-24
Aug-24
Sep-24
Oct-24
Nov-24
Dec-24
Jan-25
Feb-25
Mar-25
Apr-25
May-25
Jun-25
Jul-25
Aug-25
Sep-25
Oct-25
Nov-25
Dec-25
New Initial Application and Resubmissions
Transitioned trial

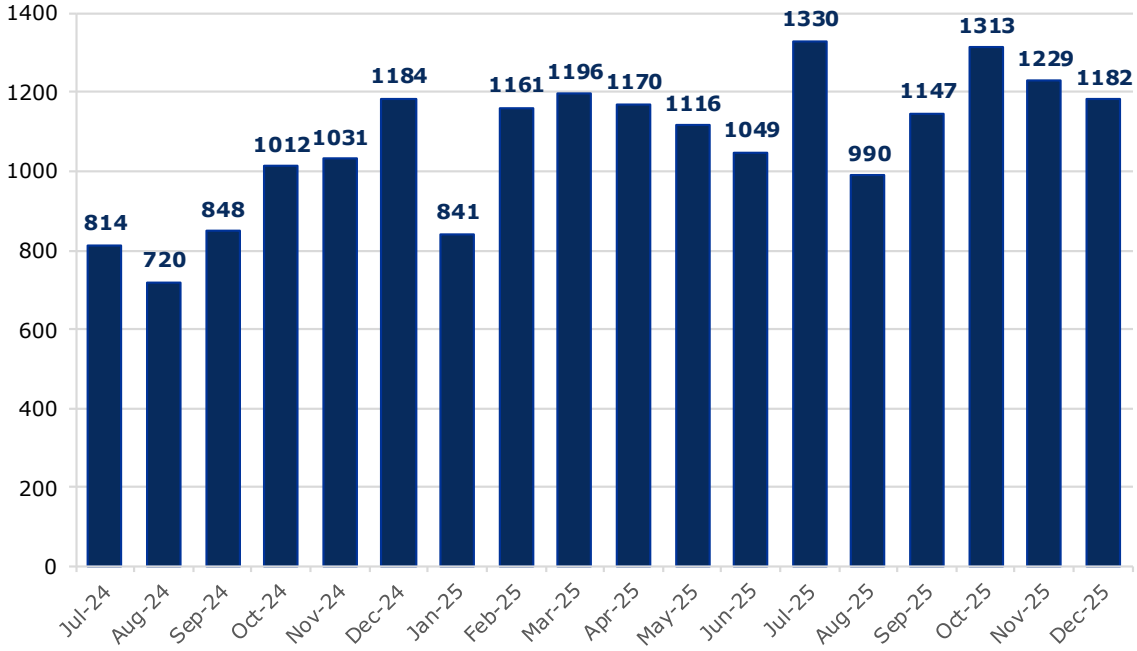
Chapter 3

Substantial modification applications

Substantial modifications[6] are those modifications that have a substantial impact on the safety or rights of the subjects or on the reliability and robustness of the data generated in the clinical trial.

Submitted substantial modification applications

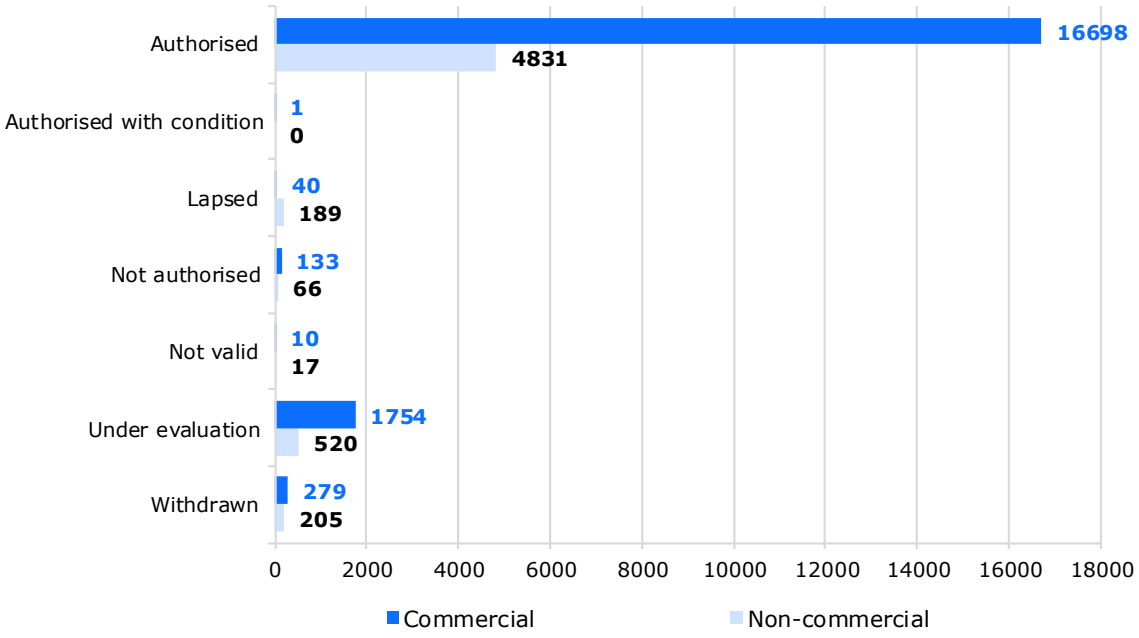
Overall, 24,743 distinct substantial modification applications, affecting 7,384 trials, have been submitted since the launch of the system on 31 January 2022, of which 3,724 substantial modifications submitted in October-December 2025, affecting 2,803 trials *(the graph below shows the data for the last 18 months)*.



Substantial modification applications per applicable statuses and by sponsor type

Since 31 January 2022, 24,743 distinct applications for substantial modifications, were submitted in CTIS, presented below per application status and sponsor type.

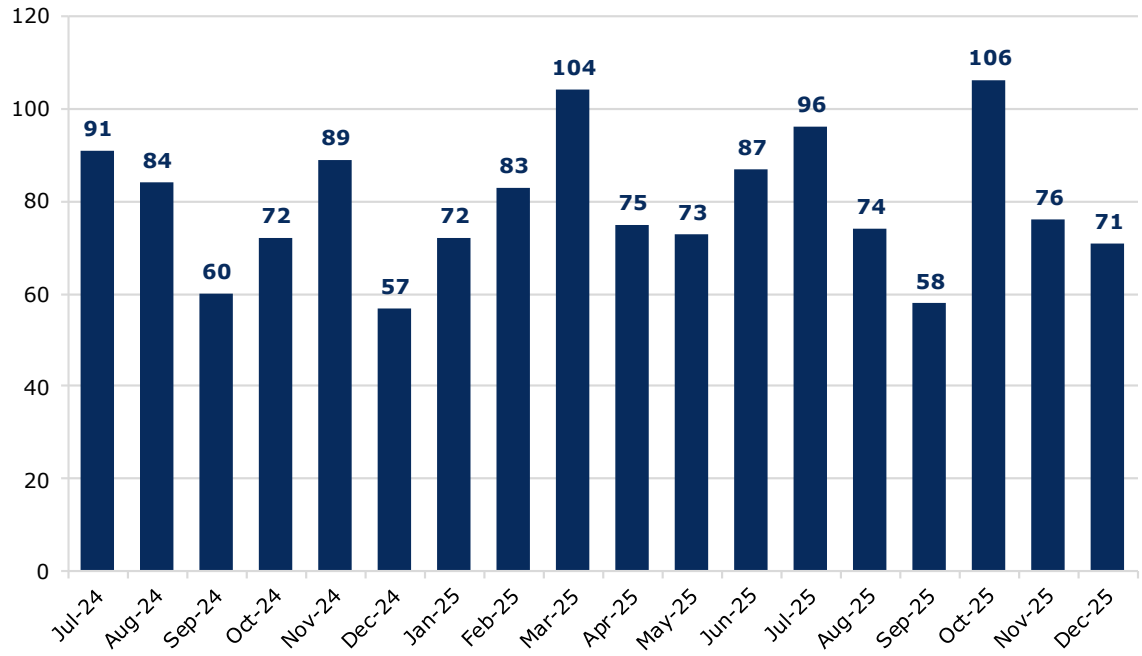
[6] Substantial modifications for part I only, or part II only or part I and part II, are foreseen in chapter II of Regulation (EU) No 536/2014


Authorised
16698
4831
Authorised with condition
1
0
Lapsed
40
189
Not authorised
133
66
Not valid
10
17
Under evaluation
1754
520
Withdrawn
279
205
0
2000
4000
6000
8000
10000
12000
14000
16000
18000
Commercial
Non-commercial

Chapter 4
Addition of a Member State Concerned

Submitted addition of Member States Concerned applications

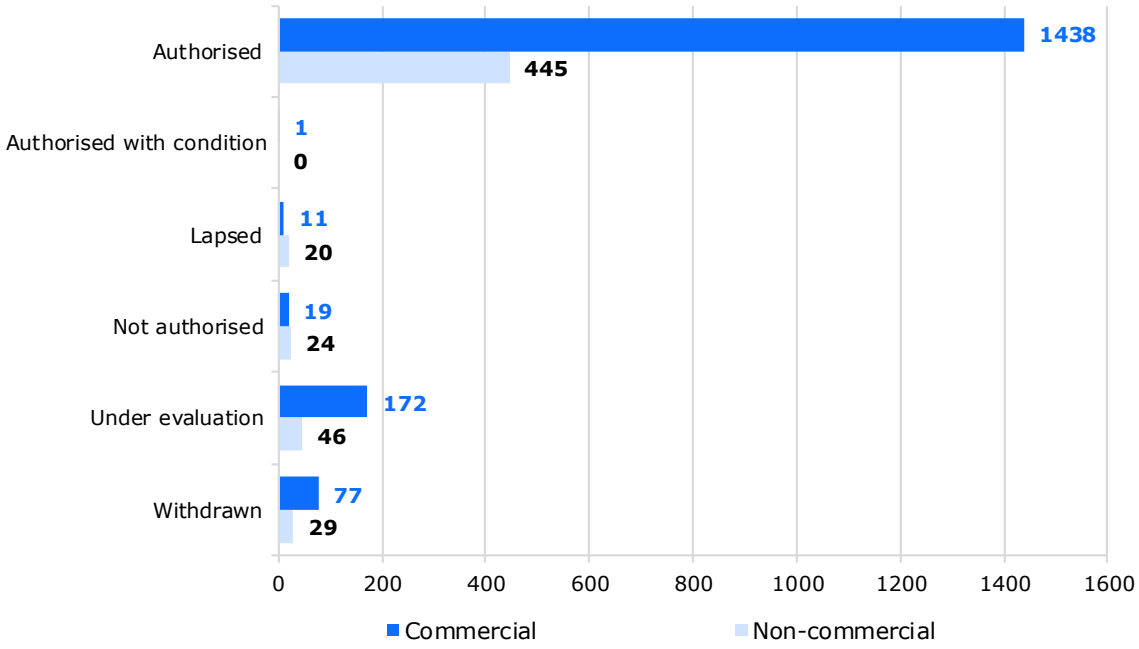
Since 31 January 2022, 2,282 distinct applications for the addition of a new MSC[7], affecting 883 trials, have been submitted in CTIS, of which 253 addition of new MSC submitted in October-December 2025, affecting 118 trials *(the graph below shows the data for the last 18 months)*.



Addition of Member States Concerned applications per applicable statuses by sponsor type

Since 31 January 2022, 2,282 distinct applications for the addition of a new MSC have been submitted in CTIS, presented below per application status and sponsor type.

[7] Applications to add a new Member States Concerned are submitted in accordance with the requirements of Article 14 of Regulation (EU) No 536/2014


Authorised
1438
445
Authorised with condition
1
0
Lapsed
11
20
Not authorised
19
24
Under evaluation
172
46
Withdrawn
77
29
0
200
400
600
800
1000
1200
1400
1600
Commercial
Non-commercial

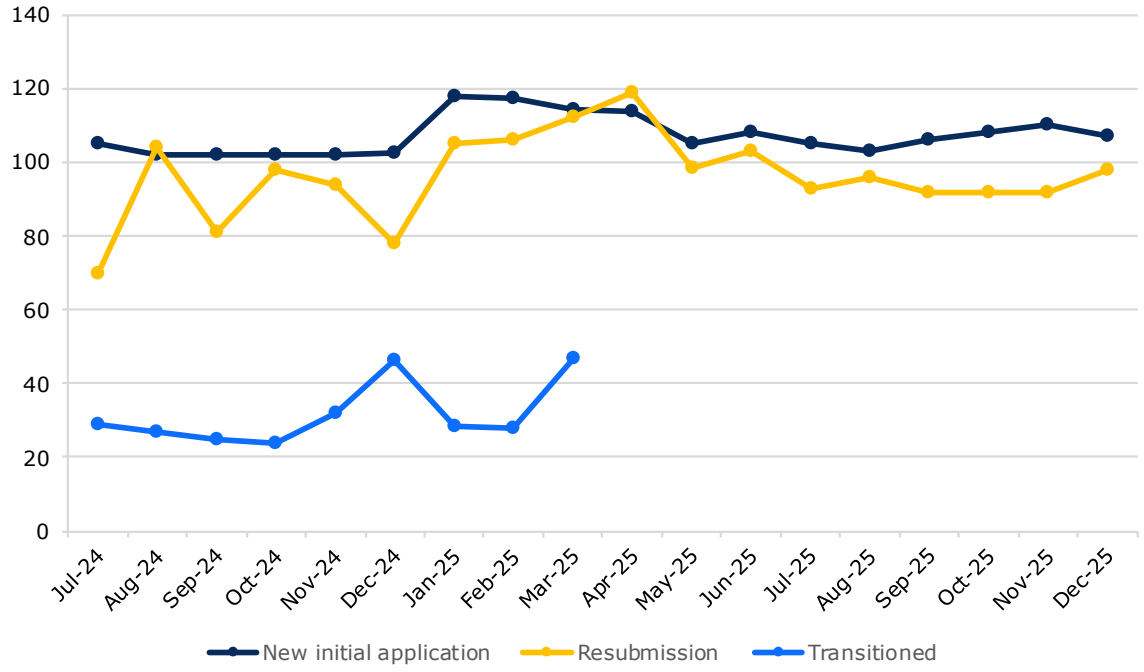
Chapter 5
Timelines

The graphs below show median timelines, for the last 18 months, from the submission of initial clinical trial applications to different points in time[8].

Median time from submission of initial clinical trial applications to decision

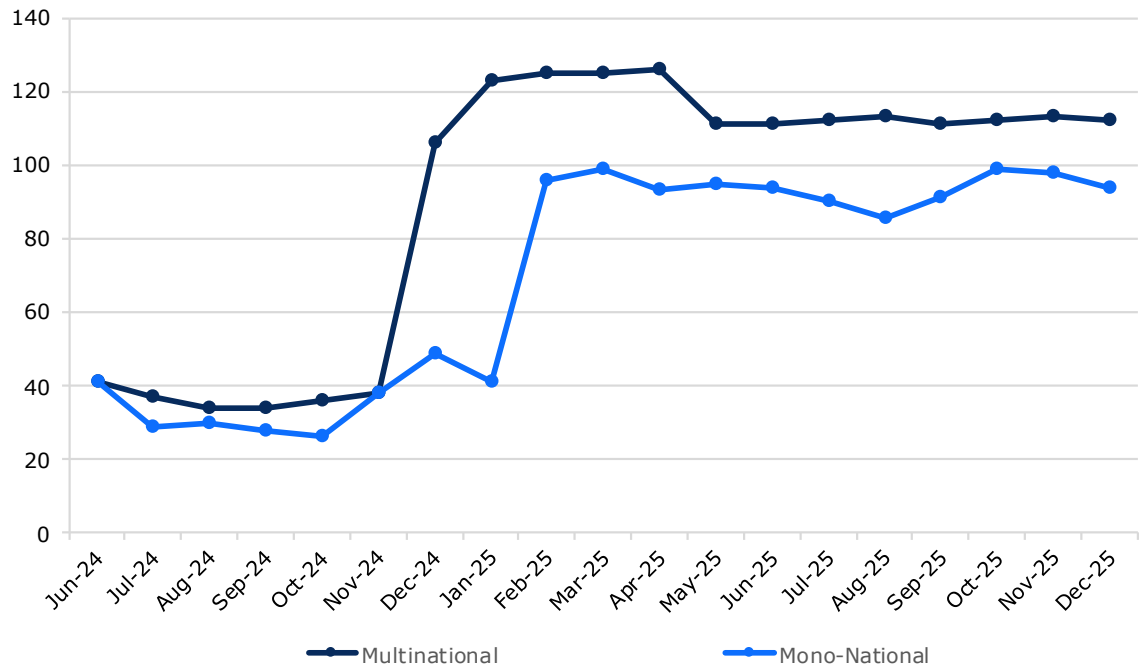
This graph takes into consideration the median number of days between the decision date, and the submission date for the trials for which the decision has been issued in that particular month. The time requested to issue a decision is related to the date when sponsors decide to submit Part II documents in case of partial initial application.

Median time per new initial application/ resubmission and transitional trials from submission of initial clinical trial applications to decision

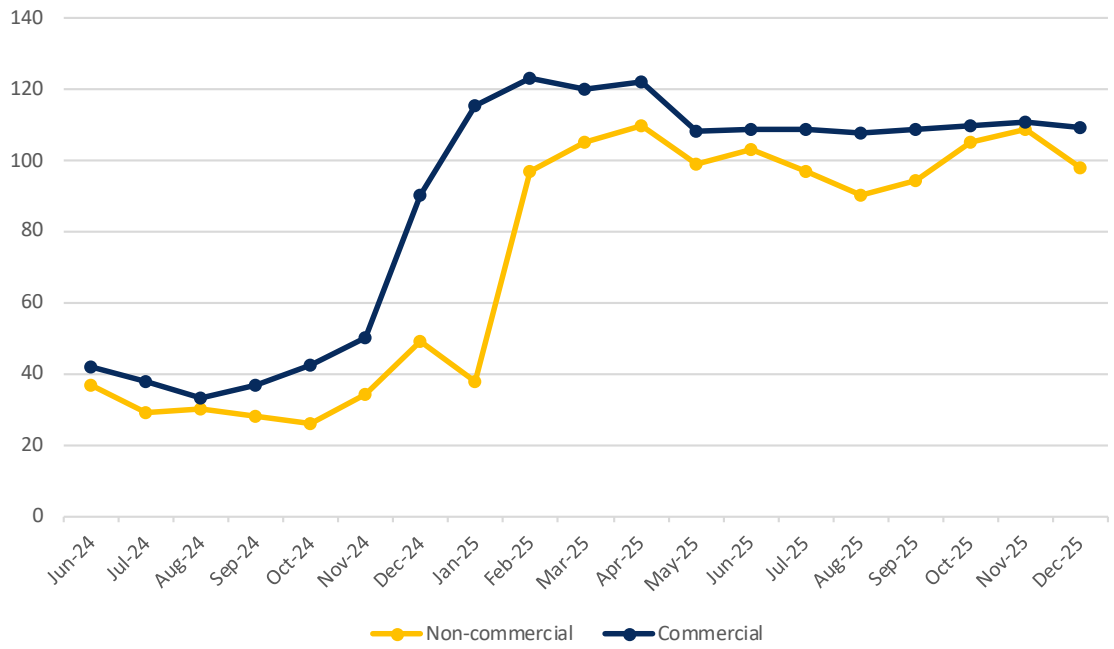


[8] The applications could be affected by the "winter clock stop" and by the Regulation (EEC, EURATOM) No 1182/71 of the Council of June 1971, determining the rules applicable to periods, dates and time limits. (Available at: https://eur-lex.europa.eu/legal). The "winter clock stop" for the Clinical Trials Information System (CTIS) refers to a designated period during the winter holidays when regulatory timelines are paused. This allows regulatory authorities and sponsors to manage workloads effectively during the holiday season, ensuring that deadlines do not coincide with staff leave periods. Due to this winter clock stop, the timelines for the applications may be affected.

Median time per mono- vs multinational clinical trials from submission of initial clinical trial applications to decision



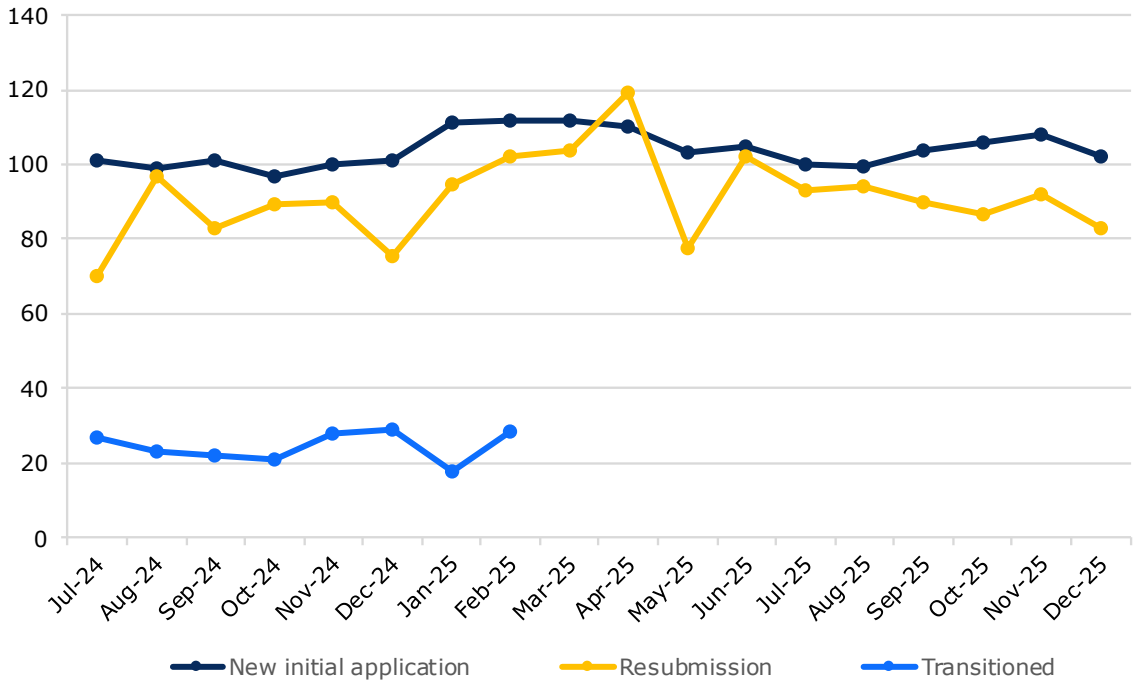
Median time per commercial/ non-commercial sponsors from submission of initial clinical trial applications to decision



The downward trend experienced in the course of 2024 visible in the previous graphs is due to the shorter timelines allocated to transitional trial applications.

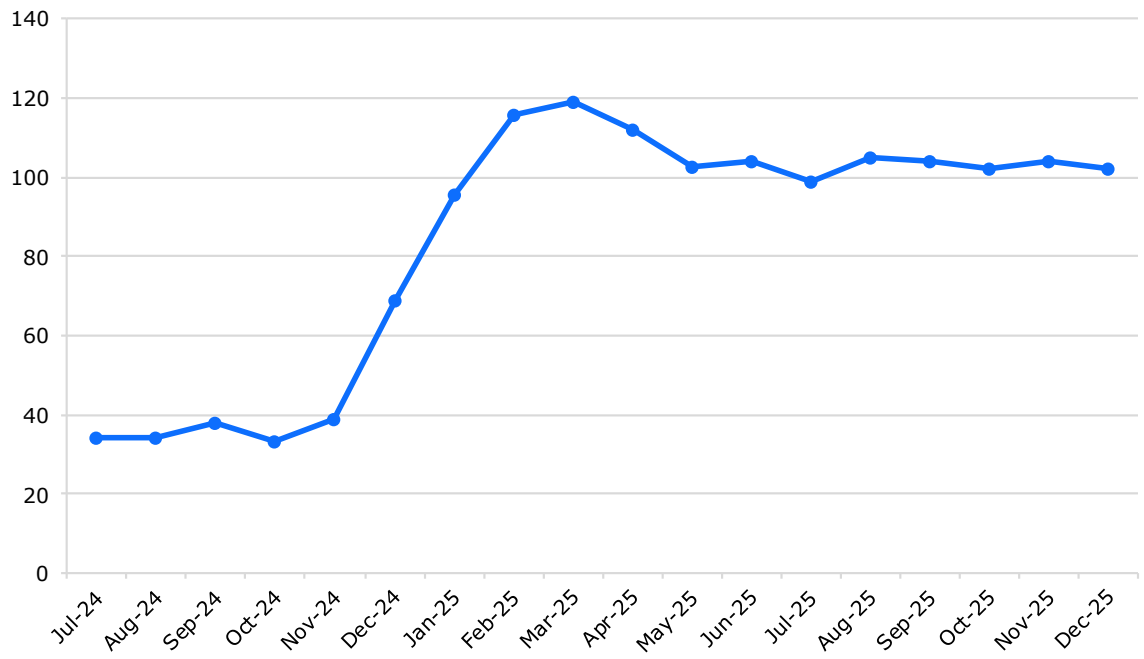
Median time from submission of initial clinical trial applications to Part I conclusion

This graph takes into consideration the median number of days between the part I conclusion and the submission date for the trials for which the part I conclusion has been issued in that particular month.



Median time from submission of initial clinical trial applications to Part II conclusions

This graph takes into consideration the median number of days between the part II conclusion, for each MSC, and the submission dates for the part I (regardless of whether the application was a full application or a partial application) for the trials for which the part II conclusion has been issued in that particular month. The time requested to reach part II conclusions depends on: (i) when conclusion on part I is issued, (ii) when sponsors submit part II documents and (iii) the time to assess part II documents and issue a part II conclusion. Sponsors are allowed to submit part II documents later than part I (still within 2 years after the notification of the conclusion on the aspects covered by Part I of the assessment report or the trial lapses – art. 11).


140
120
100
80
60
40
20
0
Jul-24
Aug-24
Sep-24
Oct-24
Nov-24
Dec-24
Jan-25
Feb-25
Mar-25
Apr-25
May-25
Jun-25
Jul-25
Aug-25
Sep-25
Oct-25
Nov-25
Dec-25

Chapter 6
Features of the substances

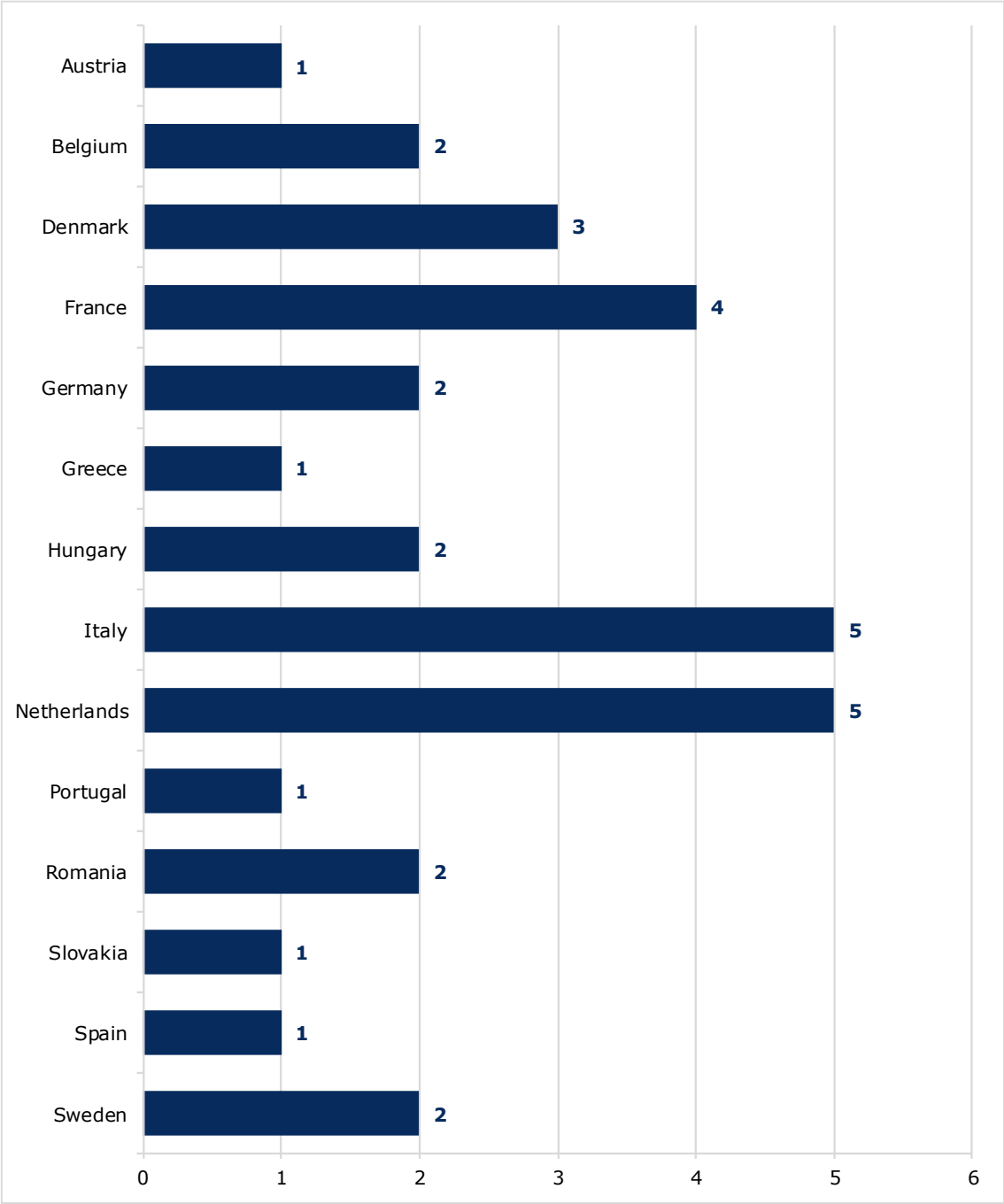
Safety assessing Member States (saMS) appointment

In multi-national clinical trials, the safety assessing Member State (saMS) is selected and responsible for the assessment of the safety report and relevant safety information of the active substances used, as described in Article(3) of **Implementing Regulation (EU) 2022/20** *of 7 January 2022 laying down rules for the application of Regulation (EU) No 536/2014 of the European Parliament and of the Council as regards setting up the rules and procedures for the cooperation of the Member States in safety assessment of clinical trials*.

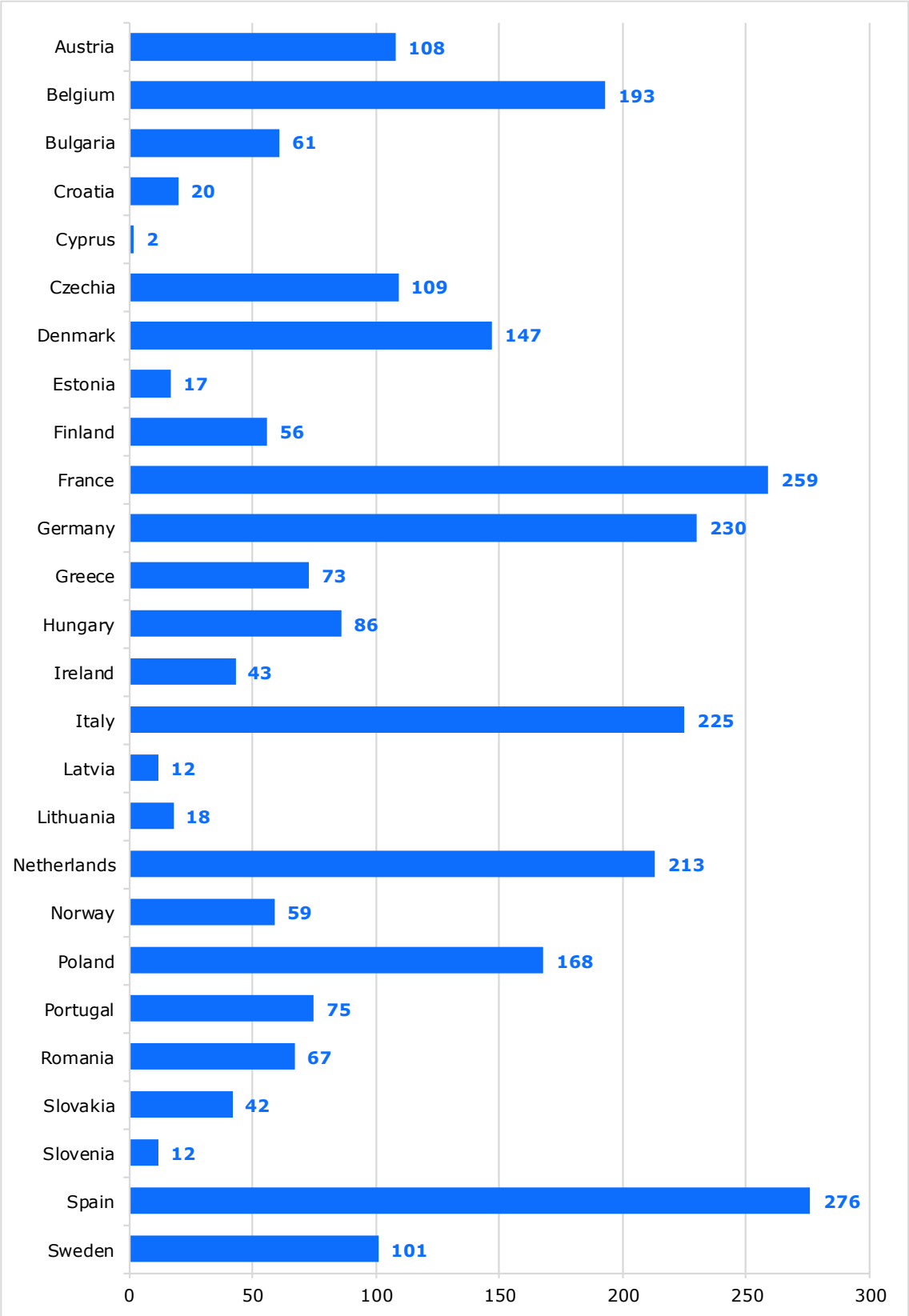
In mono-national clinical trial, the Member State is responsible for the assessment of information related to safety of active substances. Of note, the Implementing Regulation does not apply to mono-national active substances, to active substances in investigational medicinal products used as reference products, including as a placebo, or to active substances used in auxiliary medicinal products. Numbers are not displayed.

During the reporting period, Member States authorised application dossiers with 147 new active substances.

The graph below illustrates how many times each Member State has been appointed as safety assessing Member State for an active substance used in multi-national clinical trials during the reporting period.



The graph below illustrates the cumulative figures on how many times each Member State has been appointed as safety assessing Member State for an active substance used in multi-national clinical trials since February 2022.


Austria 108
Belgium 193
Bulgaria 61
Croatia 20
Cyprus 2
Czechia 109
Denmark 147
Estonia 17
Finland 56
France 259
Germany 230
Greece 73
Hungary 86
Ireland 43
Italy 225
Latvia 12
Lithuania 18
Netherlands 213
Norway 59
Poland 168
Portugal 75
Romania 67
Slovakia 42
Slovenia 12
Spain 276
Sweden 101
0
50
100
150
200
250
300

Annex

Annex I - Glossary

Term	Abbreviation	Definition
Clinical Trials Regulation	CTR	Regulation (EU) No 536/2014 of the European Parliament and of the Council of 16 April 2014 on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC.
Clinical Trials Directive	CTD	Directive 2001/20/EC of the European Parliament and of the Council of 4 April 2001 on the approximation of the laws, regulations and administrative provisions of the Member States relating to the implementation of good clinical practice in the conduct of clinical trials on medicinal products for human use.
Clinical trial application	CTA	Initial clinical trial applications, substantial modification applications, applications to add an additional Member State Concerned are all considered as 'clinical trial applications'.
Initial CTA/Initial application		Initial application of a clinical trial in at least one Member State Concerned.
New initial clinical trial application/New initial application		Initial application of a clinical trial and not marked as a transitioned or resubmitted trial.
Transitioned clinical trial		Clinical trial previously authorised under the CTD, then transferred to the CTR by means of a simplified procedure via CTIS so to be compliant with the CTR.
Resubmitted clinical trial application		Resubmission of an initial clinical trial application for authorisation to a Member State Concerned, after the refusal to grant an authorisation or the withdrawal of an application by the sponsor.
Substantial Modification	SM	Any change to any aspect of a clinical trial, which is made after the notification of a decision on a previously submitted clinical trial application and which is likely to either have a substantial impact on the safety or rights of the subjects or on the reliability and robustness of the data generated in the CT. In all cases, a modification is regarded as 'substantial' when one or both of the above criteria are met. In

		principle, it is the responsibility of the sponsor to judge whether a modification is to be regarded as 'substantial' or not. This judgement is to be made on a case-by-case basis.
Additional Member State Concerned	AddMSC	The extension of a clinical trial to another Member State Concerned territory and subjects
Clinical Trial	CT	Clinical study which fulfils any of the following conditions: (a) the assignment of the subject to a particular therapeutic strategy is decided in advance and does not fall within the normal clinical practice of the Member State concerned; (b) the decision to prescribe the investigational medicinal products is taken together with the decision to include the subject in the clinical study; or (c) diagnostic or monitoring procedures in addition to normal clinical practice are applied to the subjects."
Clinical Trial with a decision		Clinical Trial where at least one MS has issued a decision `Authorised', `Authorised with conditions' or `Not authorised'. In the KPI report, CT Halted and Ended are included in this classification. (CT Status considered: Authorised, Ended, Halted, Not authorised, Revoked).
Multi-national clinical trial		A clinical trial for which the sponsor submitted an application dossier to more than one Member State.
Mono-national clinical trial		A clinical trial for which the sponsor submitted an application dossier to one Member State.
Commercial clinical trial		A clinical trial for which the primary sponsor is a commercial sponsor.
Non-Commercial clinical trial		A clinical trial for which the primary sponsor is a non-commercial sponsor.
Clinical Trial Information System	CTIS	The IT platform, consisting of the EU portal and EU database, and the safety module that allows the exchange of clinical trials information in the European Union.

Member State concerned	MSC	A Member State that has received an application of a clinical trial intended to be conducted in its territory, or a modification of a previously submitted clinical trial application for its assessment, and therefore is responsible for the evaluation of the positive benefit/risk of that clinical trial.
Reporting Member State	RMS	Member State Concerned with a leading role during the clinical trial lifecycle that performs several tasks including the lead assessment (or creating the draft assessment report), raising and consolidating considerations during the validation and Part I assessment phases, and including conclusions on Part I.
Ongoing clinical trial		A trial that has received a positive decision in EU/EEA, it is started in at least one MSC and it is not ended in all the MSCs.
Transition period		The CTR is applicable in the EU/EEA since 31 January 2022 and has a three-year transition period. This transition period is as follows: • Until 30 January 2023 sponsors have had the chance to submit new initial clinical trial applications under the CTR via CTIS or the CTD via EudraCT; • From 31 January 2023 all new initial clinical trial applications must be submitted under the CTR; • As of 31 January 2025 only the CTR applies to all clinical trials also to those trials previously authorised under the CTD.
CT Authorised		Clinical trial for which the first MSC submits 'Authorised' or 'Authorised with conditions' to the initial application or if all the MSCs have submitted their decision, and at least one has submitted 'Authorised 'or 'Authorised with conditions'.
CT Ended		Clinical trial whose status in all MSCs is 'Ended'. This means that at some point, the clinical trial was authorised in these MSCs.
CT Halted		Clinical trial authorised with an interruption, in all MSCs, not provided in the protocol of the conduct of a clinical trial by the sponsor with the intention of the sponsor to resume it.

CT Lapsed		Clinical trial for which the sponsor has not provided responses to the RFI(s) with the timelines stipulated by the RMS (for part I RFI) or where the sponsor does not apply for an authorisation limited to aspects covered by Part II documents within two years from the conclusion Part I in all MSCs.
CT Not authorised		Clinical trial for which all the MSCs have submitted their decision and they have all selected 'Not authorised'.
CT Not valid		Clinical trial for which the RMS considers the initial clinical trial application dossier as not complete, or that the clinical trial application does not fall within the scope of the Regulation (EU) No 536/2014.
CT Under evaluation		Clinical trial for which the initial clinical trial application has been submitted in at least one MSC and for which none of the MSC(s) has issued a decision yet.
CT Withdrawn		Clinical trial for which the initial clinical trial application has been withdrawn by the sponsor in all MSCs.
Advanced therapy medicinal products	ATMP	An ATMP is defined as either a gene therapy 'medicinal product' (GTMP), a somatic cell therapy 'medicinal product' (sCTMP) or a tissue-engineered product (TEP).
Part I conclusion		Conclusions concerning the aspects addressed in Part I of a clinical trial application. This is issued by the RMS.
Part II conclusion		Conclusions concerning the aspects addressed in Part II of a clinical trial application. This is issued by each MSC individually.
Safety assessing Member State	saMS	The Member State that assesses the information submitted as suspected unexpected serious adverse reactions in accordance with Article 42 of Regulation (EU) No 536/2014, and the information contained in annual safety reports submitted in accordance with Article 43 of that Regulation, for clinical trials involving investigational medicinal products that contain the same active substance, regardless of the pharmaceutical form and strength or indication investigated and regardless of whether they are used in one or several clinical trials managed by the same or different sponsors.

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