The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

CPME response to the European Commission questionnaire on the Biotech Act

On 25 October 2025, the CPME General Assembly adopted the 'CPME response to the European Commission questionnaire on the Biotech Act' (CPME 2025/175 FINAL).

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Public Questionnaire informing the European Biotech Act

Fields marked with * are mandatory.

Introduction

The European Biotech Act

Biotechnology and biomanufacturing hold great promise for advancing competitiveness and innovation within the European Union (EU). As previously acknowledged in the Communication on Biotechnology and Biomanufacturing (March 2024) and the reports by Enrico Letta (April 2024) and Mario Draghi (September 2024), it is necessary to address the challenges faced by European companies, users and consumers, and all stakeholders involved to boost the technological advancement, competitiveness and economic growth of the EU.

To this end, the Commission has announced in the 2024-2029 political guidelines a new European Biotech Act, aimed at creating an enabling environment to make it easier to bring biotech products from the laboratory to the factory and then onto the market, while maintaining the highest safety standards for the protection of the population and the environment.

EU policy initiatives relevant for this sector are for example the Strategy for European Life Sciences, the Competitiveness Compass, new EU Bioeconomy Strategy, the AI in science Strategy, the Vision for Agriculture and Food, the European Innovation Act, the EU Start-Up and Scale-up Strategy, the Union of Skills and the Savings and Investment Union. Some of these are currently still under development and the European Biotech Act will be defined in synergies with them.

The public consultation

The European Commission is launching a **public consultation** on the European Biotech Act in the form of an online questionnaire. The aim is to gather evidence and views from stakeholders across all relevant sectors of biotechnology and biomanufacturing, including the medical and pharmaceutical, agricultural, food and feed, industrial, environmental and marine sectors. Your feedback is crucial for identifying the most important challenges and barriers that could be addressed by the Act and for shaping targeted policy actions.

Instructions

The first section of the questionnaire contains questions about you or the organisation you represent, which is then followed by questions on the regulatory and non-regulatory environment in the EU to inform the policy-

making process of the European Biotech Act.

Whenever possible, please substantiate your replies with data and sources of information or practical examples.

This questionnaire is available in all EU official languages and you can reply in any EU official language. You can pause at any time and continue later. You can download your contribution once you have submitted your answers.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian

- ○ Spanish
- ○ Swedish

* I am giving my contribution as

- ○ Academic/research institution
- ○ Business association
- ○ Company/business
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ◉ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union
- ○ Other

Do you identify yourself as a private investor (e.g. venture capitalist, business angel)?

- ○ Yes
- ◉ No
- ○ I don't know/I'd rather not say

* This questionnaire covers **all areas of biotechnologies.** Please indicate the **sector s** that are relevant to you or the organisation you represent, or which you have most knowledge on.

You can select multiple sectors.

Please note that your answers to the questionnaire will be analysed in relation to the sector(s) you have selected.

- ☐ Medical/pharmaceutical
- ☐ Agricultural
- ☐ Food/feed
- ☐ Industrial

- [ ] Environmental
- [ ] Marine
- [ ] Bioinformatics
- [ ] Biotechnology for defence and security
- [x] Other areas of biotechnology
- [ ] Not applicable

If a different sector of biotechnology is relevant to you or the organisation you represent, please specify.

European Doctors

* First name

Diogo

* Surname

Teixeira Pereira

* Email (this won't be published)

diogo.teixeira.pereira@cpme.eu

* Organisation name

255 character(s) maximum

Standing Committee of European Doctors (CPME)

* Organisation size

- (•) Micro (1 to 9 employees)
- ( ) Small (10 to 49 employees)
- ( ) Medium (50 to 249 employees)
- ( ) Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

9276943405-41

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan

- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d’Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**

  Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- **Public**

  Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the personal data protection provisions

Questions regarding a future European Biotech Act

*Mandatory questions are indicated with an *.*

Please note that the answers to the questionnaire will be analysed in relation to the area(s) you have selected in the 'About you' section.

Section 1 - General views on biotechnology

Biotechnology can be defined as the application of science and technology to living organisms, as well as parts, products and models of them, to alter living or non-living materials for the production of knowledge, goods and services.

Biomanufacturing is the use and conversion of biotechnology and biological resources into chemicals, products and energy.

Q1. Considering **biotechnology and biomanufacturing products overall,** to what extent do you agree with the following:

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable/I don't know
* Biotechnology and biomanufacturing products can **positively impact the EU economy**	○	○	○	○	○	◉
* Biotechnology and biomanufacturing can **positively impact the EU society**	○	○	○	○	○	◉
* Biotechnology and biomanufacturing can **positively impact the environment**	○	○	○	○	○	◉
* Biotechnology and biomanufacturing products that reach the EU market are **safe and secure**	○	○	○	○	○	◉
* **Information to users and consumers** on biotechnology and biomanufacturing is available and accessible	○	○	○	○	○	◉
* Consumes are **willing to pay a price premium** for biotechnology and biomanufacturing products	○	○	○	○	○	◉

Section 2 - The regulatory environment in the EU

The following questions seek to collect views on the regulatory environment in the EU, in particular the perceived regulatory barriers.

Q1. Taking into account recent initiatives and legislation adopted or under discussion at EU level, to what extent do you agree with the following statement: **EU rules lead to regulatory barriers for biotechnology and biomanufacturing products to reach the market in the following phases:**

Not all phases may be applicable to all biotechnology and biomanufacturing products.

This specific question covers EU rules, i.e. legislation stemming from the European Union.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable/I don't know
* In early-stage or pre-clinical development	○	○	○	○	○	◉
* In product development	○	○	○	○	○	◉
* In pre-commercial testing or clinical trials	◉	○	○	○	○	○
* In the assessment and in obtaining authorisation to market products	○	○	○	○	○	◉
* In techno-economics (outside of health) or health technology assessment	○	○	○	○	○	◉
* In commercialising products	○	○	○	○	○	◉
* In scaling-up production or manufacturing	○	○	○	○	○	◉
* In post-market activities, including monitoring and surveillance	○	◉	○	○	○	○

Q2. Please indicate **other phases of the innovation and manufacturing cycle** where there are **regulatory barriers** caused by EU rules.

600 character(s) maximum

CPME urges the Act to recognise ethical standards in early-stage and pre-clinical development, as well as in clinical trials, as key to patient safety, as enshrined in the WMA Declaration of Helsinki and Declaration of Taipei. While respecting Member States' prerogatives on ethics, CPME calls for alignment with the high standards of the Clinical Trials Regulation. It stresses the need to maintain these standards, ensure effective implementation, and promote transparency through financial support to the biotechnology sector.

Q3. Please substantiate your statements with **additional evidence** on the **challenges** resulting from the **EU regulatory environment**.

600 character(s) maximum

The WMA Declaration of Helsinki and Declaration of Taipei set out ethical principles for medical research underlining that rights, interests, and well-being of research participants must always take precedence over scientific and societal interests. This provides an ethical anchor for methodological choices to maintain high standards in clinical trials and ensure effective implementation of the CTR. We also urge the Commission to ensure that financial support to the biotechnology sector also contributes to more transparency in the pharma sector.

The following questions seek to collect views on possible ways forward to simplify and streamline the EU regulatory environment applicable to biotechnology and biomanufacturing products.

* **Q4.** In your view, what **actions at EU level** are necessary to **improve the regulatory environment for biotechnology and biomanufacturing** in the EU? Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

CPME strongly believes that priority should always be given to the safety, rights and well-being of the individual. This priority should prevail over all other interests. The World Medical Association Declaration of Helsinki on Ethical principles for medical research involving human subjects puts in its Article 6 the well-being of the subject on the forefront. This is however not taken into account in the preparation of this legislation. CPME calls on the well-being of the patient to be included to the Act, as well as its prevalence over all other interests.

The following questions refer to views or experience with regulatory environments in countries outside of the EU and of the EEA (Norway, Iceland and Liechtenstein).

Q5. To what extent do you agree that the EU regulatory environment in comparison with some of the countries outside of the EU...:

For each statement, you will have the possibility to indicate the third country(ies) your answer refers to.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable/I don't know
... is more **predictable**	○	○	○	○	○	◉
... is **less complex and clearer**	○	○	○	○	○	◉
... leads to lower **costs** for **complying** with the regulation	○	○	○	○	○	◉
... **enables** biotechnology and biomanufacturing products to **reach the market faster**	○	○	○	○	○	◉
... ensures a **higher level of safety and security**	○	○	○	○	○	◉

Q6. Please indicate any **other relevant factors that characterise the regulations in non-EU countries** and that are applicable to biotechnology and biomanufacturing products.

600 character(s) maximum

N/A

Section 3 - Access to capital

The following questions seek to collect views on access to public and private capital and related barriers.

Q1. To what extent do you agree it is **easy to access the following types of public investments in the EU:**

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Grants and subsidies (e.g. at EU level: HORIZON, EU4Health)	○	○	○	○	○	◉
* Debt and equity instruments (e.g. European Innovation Council, European Investment Bank, Strategic Technologies for Europe Platform)	○	○	○	○	○	◉
* Commercialisation support	○	○	○	○	○	◉
* Support to capacity expansion	○	○	○	○	○	◉

Q2. To what extent do you agree it is **easy to access the following types of private investments in the EU:**

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable/I don't know
* Angel investors	○	○	○	○	○	◉
* Venture capital: Start-up/early stage (Series A)	○	○	○	○	○	◉
* Venture capital: Expansion stage (Series B)	○	○	○	○	○	◉
* Venture capital: Growth stage (Series C, etc)	○	○	○	○	○	◉
* Debt financing	○	○	○	○	○	◉
* Private equity	○	○	○	○	○	◉
* Strategic research or sales partnerships and collaborations	○	○	○	○	○	◉
* Publicly listing (Initial Public Offering (IPO))	○	○	○	○	○	◉
* Capital markets/shareholders	○	○	○	○	○	◉
* Corporate funding (from other companies in the market)	○	○	○	○	○	◉

* **Q3.** In your views, are there **other financial instruments** relevant for the biotechnology sector in the EU?

- ○ Yes
- ○ No
- ◉ I don't know

Q4. Based on your experience, to what extent do you agree that the following factors **drive investment in a biotechnology company**?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Innovative science	○	○	○	○	○	◉
* Groundbreaking technology (e. g. health biotech: a breakthrough that significantly improves upon existing therapies or addresses unmet medical needs; food biotech: solution that can boost food security)	○	○	○	○	○	◉
* Scientific evidence, including data, concerning innovation	○	○	○	○	○	◉
* Access to data held by public sector bodies	○	○	○	○	○	◉
* Experienced management team	○	○	○	○	○	◉
* Robust supply chain	○	○	○	○	○	◉
* Regulatory certainty (e.g. length and predictability of authorisation process)	○	○	○	○	○	◉
* Sufficient protection of intellectual property	○	○	○	○	○	◉
* Financial health and projections	○	○	○	○	○	◉

Q5. Please indicate **other factors that drive investment** in a biotechnology and/or biomanufacturing company here.

1000 character(s) maximum

N/A

Q8. Please substantiate your statements with **additional evidence** on the **challenges** related to **access to finance in the EU**.

600 character(s) maximum

N/A

The following questions seek to collect views on possible ways forward to support access to finance in the EU.

* **Q9.** In your view, what **actions at EU level** are necessary for the public sector **to attract/derisk private investments in biotechnology and/or biomanufacturing**? Please substantiate your statements with views and evidence on the ways forward.

You can provide references of successful schemes existing at EU level, national level or in other jurisdictions to attract private capital in biotechnology.

600 character(s) maximum

N/A

* **Q10.** In your view, what **actions at EU level** are necessary to prioritise **funding for high-risk and high-reward biotechnology research and innovation?** Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

* **Q11.** In your view, what **other actions** are necessary at EU level? Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

Section 4 - Biotechnology clusters and/or cluster organisations

The following questions seek to collect views on biotechnology clusters and/or cluster organisations in the EU.

'**Clusters** are groups of firms, related economic actors, and institutions located near each other and with sufficient scale to develop specialised expertise, services, resources, suppliers and skills.' [**link to definition of clusters**]

'**Cluster organisations** are the legal entities that support the strengthening of collaboration, networking and learning in innovation clusters and act as innovation support providers by providing or channelling specialised and customised business support services to stimulate innovation activities, especially in SMEs. They are usually the actors that facilitate strategic partnering across clusters.' [**link to definition of cluster organisations**]

Q1. To what extent do you agree that biotechnology clusters and/or cluster organisations in the EU face the **following barriers** in order to reach their full potential?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know

* Insufficient number of academic institutions with long standing expertise in the area of biotechnology	○	○	○	○	○	◉
* Insufficient presence of industrial players	○	○	○	○	○	◉
* Insufficient higher education or vocational training institutions	○	○	○	○	○	◉
* Insufficient startup incubators or business support infrastructure (providing for example regulatory affair support)	○	○	○	○	○	◉
* Lack of technology transfer offices	○	○	○	○	○	◉
* Incapacity to reach a critical mass of stakeholders	○	○	○	○	○	◉
* Insufficient public support	○	○	○	○	○	◉
* Insufficient collaboration among existing clusters	○	○	○	○	○	◉
* Insufficient financial support	○	○	○	○	○	◉

Q2. Please indicate **other factors impacting biotechnology clusters and/or cluster organisations** in the EU.

1000 character(s) maximum

N/A

Q3. Please substantiate your statements with **additional evidence** on the **challenge s** faced by **biotechnology clusters and/or cluster organisations** in the EU.

600 character(s) maximum

N/A

The following questions seek to collect views on possible ways forward to support biotechnology clusters and/or cluster organisations in the EU.

* **Q4.** In your view, what **actions at EU level** are necessary to **enhance the impact of biotechnology clusters and/or cluster organisations in the EU**? Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

* **Q5.** In your view, what **actions at EU level** are necessary to create more **synergies** between existing clusters and/or cluster organisations and facilitate **pooling of expertise and resources** in the EU? Please substantiate your statements with views and evidence on the ways forward here.

600 character(s) maximum

N/A

Section 5 - Biotechnology manufacturing

The following questions seek to collect views on biotechnology manufacturing in the EU.

Q1. To what extent do you agree that biotechnology manufacturing in the EU faces the following challenges:

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Length and/or complexity of permitting processes for new facilities	○	○	○	○	○	◉
* High cost of raw material and/or of the operations	○	○	○	○	○	◉

* High energy costs	○	○	○	○	○	◉
* Other operational costs	○	○	○	○	○	◉
* Limitations in logistics and physical infrastructure	○	○	○	○	○	◉
* Vulnerabilities in supply chains and strategic dependencies	○	○	○	○	◉	○
* Labour costs	○	○	○	○	○	◉
* Inconsistent environmental and sustainability policies or lack of a policy	○	○	○	○	○	◉
* Taxation and customs barriers (e.g. tax credits, import duties)	○	○	○	○	○	◉
* Global competition	○	○	○	○	○	◉
* Difficulty scaling up from pilot to industrial production	○	○	○	○	○	◉
* Maintaining product quality and consistency at scale	○	○	○	○	○	◉

Q2. Please indicate **other challenges impacting biotechnology manufacturing in the EU**.

600 character(s) maximum

Currently, the majority of Active Pharmaceutical Ingredients (API) and medicines are produced outside of Europe in limited number of manufacturing sites. Distant location of factories makes it more difficult to inspect them and results in longer, less transparent and fragile supply chains. Unforeseen disruptions or quality and production problems have far-reaching consequences. At the production sites, delays in supply can also result from the shortages of raw materials and the Act should also address this element on strengthening EU supply chains and ensuring our strategic autonomy.

Q3. Please substantiate your statements with **additional evidence** on the **challenges impacting biotechnology manufacturing in the EU**.

600 character(s) maximum

While assessing the challenges impacting biotechnology manufacturing in the EU, patient benefit and safety aspects must be adequately taken into consideration. At the same time, the Commission cannot overlook the overuse of the regulatory procedures for accelerated assessment. It must critically review the use of accelerated schemes that facilitates market entry for medicines with limited information on their added therapeutic benefits and safety issues.

The following question seeks to collect views on possible ways forward to support biotechnology manufacturing in the EU.

* **Q4.** In your view, what **actions at EU level** are necessary to **enhance the impact of biotechnology manufacturing in the EU?** Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

Member States should adopt policies to increase diversification of supply sources, especially on essential medicines. The current overreliance on manufacturing sites located in third and remote countries for the production of active pharmaceutical ingredients and medicines constitutes a real threat to the secure and stable supply in the EU. The EU should explore incentives to shift the production of essential medicines back to Europe. This however should not compromise on quality, environmental or work safety standards in Europe.

Section 6 - Availability, upskilling and reskilling the biotechnology workforce

The following questions seek to collect views on the needs of the workforce in biotechnology in the EU.

Q1. To what extent do you agree that **the EU workforce for biotechnology** faces the following **challenges?**

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Shortage of vocational skills especially for biotechnology and biomanufacturing (e.g. lab technicians, operators, etc.)	○	○	○	○	○	◉
* Insufficient STEM education graduates (STEM: Science, Technology, Engineering, Mathematics)	○	○	○	○	○	◉
* Insufficient research and technical skills	○	○	○	○	○	◉
* Insufficient regulatory and quality assurance expertise	○	○	○	○	○	◉
* Insufficient digital and data science skills	○	○	○	○	○	◉
* Insufficient intellectual property skills	○	○	○	○	○	◉
* Limited financial, entrepreneurial skills and mindsets	○	○	○	○	○	◉
* Other	○	○	○	○	○	◉

Q2. Please indicate **other challenges faced by the workforce for biotechnology in the EU**.

600 character(s) maximum

N/A

Q3. To what extent do you agree that **the following factors** lead to the EU workforce facing the above-mentioned challenges?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Difficulty in attracting, developing and retaining global talent	○	○	○	○	○	◉
* Misalignment between education and industry needs	○	○	○	○	○	◉
* Regional disparities in the availability of skilled workers in the EU (for example as a result of brain drain or lack of availability of training courses)	○	○	○	○	○	◉
* Insufficient public and private investment in skilled workforce	○	○	○	○	○	◉

Q4. Please indicate **other factors** leading to the **EU workforce facing the above-mentioned challenges**.

1000 character(s) maximum

N/A

Q5. Please substantiate your statements with **additional evidence on the challenges faced by the workforce for biotechnology in the EU**.

600 character(s) maximum

N/A

* **Q6.** In your view, what **actions at EU level** are necessary to **enhance specialised training programmes/curricula?** Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

* **Q7.** In your view, what **actions at EU level** are necessary to **enhance support for scientists to launch a business** (e.g. through incubators, pilot facilities for knowledge transfer and idea testing, etc.)? Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

* **Q8.** In your view, what **actions at EU level** are necessary to support **programmes to attract talent from other geographical areas**? Please substantiate your answers with views and evidence on the ways forward.

600 character(s) maximum

N/A

* **Q9.** In your view, what **other actions at EU level** are necessary for the availability, upskilling and reskilling of the biotechnology workforce? Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

Section 7 - Data and Artificial Intelligence

The following questions seek to collect views on the challenges related to access to data and on the development, deployment and use of Artificial Intelligence (AI) in biotechnology.

* **Q1.** Are you or the organisation you represent having difficulties in **accessing or using relevant data** for the development of biotechnology or biomanufacturing products?

- ○ Yes
- ○ No
- ○ Partially
- ◉ Not applicable/I don't know

* **Q2.** Are you or the organisation you represent relying on **data sourced from outside of the EU/EEA** for the development of biotechnology and biomanufacturing products and services?

- ○ Yes
- ○ No
- ◉ Not applicable/I don't know

Q3. To what extent do you agree that **data synthetisation** is a viable means to overcome data scarcity in the EU?

- ○ Strongly disagree
- ○ Disagree
- ○ Neutral
- ◉ Agree

- Strongly agree
- Not applicable/I don't know

The next set of questions specifically cover the implementation of the European Health Data Space (EHDS) and consequently focus on health data.

In the health domain, the EHDS aims to alleviate challenges in accessing data for secondary use by establishing a legal framework facilitating the reuse of health data for research and innovation, including in the biotechnology sector. The EHDS Regulation entered into force on 26 March 2025 and its key provisions will enter into application and be operational by March 2029.

Q4. Regarding the health biotechnology sector, are you or the organisation you represent **actively preparing for the entry into application of the EHDS?**

- Yes
- No
- Not applicable/I don't know

Q5. Which types of services of research and health data infrastructures (e.g. biobank research infrastructures) are currently used in the biotechnology sector?

600 character(s) maximum

Biobank research infrastructures, cloud-based platforms

The following questions specifically concern the transformative potential of AI for biotechnology.

In the following questions, a distinction is made between two categories of AI use in biotechnology, representing different phases of the innovation cycle:

1. Use of AI in Research and Development (R&D): Biotech companies using AI toolsto support or accelerate their R&D processes (e.g. using AI to identify drug targets or design new molecules, applying machine learning to analyse omics data, etc).

2. Deployment and scale-up of AI-based Biotechnology Products: Biotech companies developing AI-powered products or services and deploying these products into real-world settings (e.g.AI-powered biomanufacturing platforms aimed to be integrated in production facilities, AI powered diagnostic tool that analyses blood based biomarkers to detect early stage cancer using a biological model of tumour progression, etc).

Q6. To what extent do you agree that **the use of AI in R&D** is facing the following challenges:

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* **Technological challenges, access and use of data** (e.g. outdated infrastructure to support the integration of AI tools, lack of interoperability, lack of local validation (performance testing), lack of post-deployment monitoring mechanisms, lack of AI transparency and explainability etc)	○	○	○	○	○	◉
* **Challenges in the implementation of regulatory frameworks** (e.g. complex regulatory landscapes for AI users and/or deployers, concerns over liability, concerns surrounding data security and privacy etc)	○	○	○	○	○	◉
* **Organisational and business challenges** (e.g. lack of end-user involvement in the development and deployment of AI tools, lack of added value assessment in deploying AI, lack of AI strategy for use/deployment in the entity)	○	○	○	◉	○	○
* **Social and cultural challenges** (e.g. lack of trust in AI tools, lack of digital literacy among users/deployers/the public, concerns on job security, concerns surrounding overreliance on AI tools, etc	○	○	○	◉	○	○

Q7. To what extent do you agree that **the deployment of AI-based biotech products** is facing the following challenges:

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* **Technological challenges, access and use of data** (e.g. outdated infrastructure to support the integration of AI tools, lack of interoperability, lack of local validation (performance testing), lack of post-deployment monitoring mechanisms, lack of AI transparency and explainability etc)	○	○	○	◉	○	○
* **Challenges in the implementation of regulatory frameworks** (e.g. complex regulatory landscapes for AI users and/or deployers, concerns over liability, concerns surrounding data security and privacy etc)	○	○	○	○	○	◉
* **Organisational and business challenges** (e.g. lack of end-user involvement in the development and deployment of AI tools, lack of added value assessment in deploying AI, lack of AI strategy for use/deployment in the entity)	○	○	○	◉	○	○
* **Social and cultural challenges** (e.g. lack of trust in AI tools, lack of digital literacy among users/deployers/the public, concerns on job security, concerns surrounding overreliance on AI tools, etc	○	○	○	◉	○	○

Q8. Please substantiate your statements with **additional evidence** on **access to data, the use of AI in R&D,** and **deployment of AI-based biotech products in the EU biotechnology sector** here.

600 character(s) maximum

The challenges are not specific to the biotechnology sector, but common to other sectors, such as healthcare (see CPME policy on deployment of AI in healthcare). The questions assemble challenges which have different weight for CPME. For example, CPME supported the development of the AI Act, since the use of AI in healthcare requires strong safeguards to ensure patient safety, proper human oversight, compliance with data protection law and medical ethics. The complex regulatory landscape is a part of a necessary transition period of learning and implementation.

The following questions seek to collect views on possible ways forward to support the deployment and use of AI and data in biotech.

* **Q9.** In your view, what **actions at EU level** are necessary to enhance **the use of AI in R&D in biotechnology** in the EU?

600 character(s) maximum

Support certification of AI-driven software solutions to increase trust among users, and we should ensure that the AI tools and biotech solutions contribute to solving clinically relevant problems. Encourage AI and cyber insurance coverage. Coordinate knowledge environment at EU and national level. Promote reliability of datasets, ensuring that product manufacturers are transparent about the technology used and underlying training data. Implementation of AI solutions require adaption to the clinical setting and ongoing follow-up from healthcare workforce to ensure quality and precision.

* **Q10.** In your view, what **actions at EU level** are necessary to enhance the **deployment of AI-based biotechnology products** in the EU?

600 character(s) maximum

Design on actual sector demands and in dynamic loop; compliance of AI with bioethics, data protection and fundamental rights; regular evaluation efficiency and efficacy; certification of AI systems to increase trust; Promote literacy and competence development; adequate monitoring and oversight with a clear liability regime for AI exists; Encourage AI and cyber insurance coverage; Coordinate knowledge environment at EU and national level. Build public trust, via transparency, high standards of governance, reliable safeguards.

Q11. In your view, what **other actions** should be prioritised **at EU level** related to **data and AI in the field of biotechnology and biomanufacturing** (e.g. on data, on use of high-performance computers (HPC), etc.)?

600 character(s) maximum

EU cloud systems

Q12. The European Commission is supporting the creation of **AI Factories** to accelerate trustworthy AI development. AI Factories are dynamic ecosystems bringing together computing power, data, and talent to create cutting-edge AI models and applications across various sectors (e.g. health, manufacturing, climate etc.).

In your views, how can the AI factories be leveraged to advance biotechnology innovation in Europe?

	Yes	No	Not applicable /I don't know
* Host public-private AI model development for biotech use cases	○	○	◉
* Support validation and certification of AI tools in the biotech field	○	○	◉
* Secure and high-performance processing of health data made available through the EHDS for development of innovative products and tools for the biotech sector	○	○	◉
* Provide access and/or facilitate the use of high-quality datasets through 'data labs'	○	○	◉
* Other	◉	○	○

Q12a. If you would like to indicate other factors, you can do so here.

600 character(s) maximum

Host public-private AI model development for biotech use cases: agree Support validation and certification of AI tools in the biotech field: strongly agree Secure and high-performance processing of health data made available through the EHDS for development of innovative products and tools for the biotech sector: agree Provide access and/or facilitate the use of high-quality datasets: agree

Q13. To what extent do you agree that the following types of support would help biotech companies, particularly SMEs, **develop and deploy AI solutions more effectively** in the EU?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know

* Dedicated funding instruments for biotech-related AI research and development	○	○	○	◉	○	○
* Access to annotated datasets (e. g. biological, clinical, genomic data)	○	○	○	◉	○	○
* Access to synthetic datasets	○	○	○	◉	○	○
* Regulatory sandboxes for testing biotech-related AI models	○	○	○	◉	○	○
* Partnerships with public research institutions or AI hubs /factories	○	○	○	◉	○	○
* Simplified IP and data-sharing frameworks	○	○	○	◉	○	○
* Skills development and AI training for biotech personnel	○	○	○	○	◉	○
* Roadmaps for implementation and scalability of AI tools in the EU ecosystem	○	○	○	○	◉	○
* Other	○	○	○	○	○	◉

Q14. If you would like to substantiate any of your statements with additional evidence on **the ways forward** to **support the deployment and use of data and AI in biotechnology,** you can do so here.

600 character(s) maximum

Please see CPME position on the deployment of AI in healthcare - sector specific challenges: https://www.cpme.eu/api/documents/adopted/2024/11/cpme_ad_09112024_073.final.policy.on.deployment.of.ai.in.healthcare.pdf

Section 8 - Defence and security

Advanced biotechnological possibilities including development of synthetic pathogens, aided by AI-driven software systems, are creating new risks related to future health preparedness and potential of weaponisation by State or non-State actors (Sauli Niinistö report, October 2024).

The following questions seek to collect views on biotechnology for defence and security in the EU.

Q1. To what extent do you agree that application of **biotechnology in defence and security related areas** faces the following **challenges in the EU**?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Threats related to biosecurity and biosafety, including misuse of biotechnology	○	○	○	○	◉	○
* Risks to strategic autonomy in biomanufacturing, and availability of medical and non-medical countermeasures	○	○	○	○	◉	○
* Vulnerabilities in the resilience of biotech supply chains	○	○	○	○	◉	○
* Insufficient civil military cooperation in biotechnology sector	○	○	○	○	◉	○
* Cybersecurity risks to biotech infrastructure and AI tools used in biotechnology	○	○	○	○	○	◉
* Other	○	○	○	○	◉	○

* **Q2.** Please indicate **other challenges** impacting biotechnology for defence and security in the EU.

600 character(s) maximum

Biotechnology should not be used for destructive purposes, such as bioweapons, and a precautionary approach should be taken if there are risks to human life, biodiversity and the environment.

Q3. To what extent do you agree that **biotechnology for defence and security** is creating the following **opportunities in the EU**?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
* Facilitate detecting biological and chemical threats, including via availability of biosensors	○	○	○	○	○	◉
* Opportunity to revolutionise defence logistics with biotechnology products (including food) manufacturing close to its point of use	○	○	○	○	○	◉
* Development of new innovative medical countermeasures including vaccines and antidotes	○	○	○	○	◉	○
* Developments of materials with new functions and/or improved characteristic	○	○	○	○	○	◉
* Increased food security	○	○	○	○	○	◉
* Other	○	○	○	○	○	◉

The following questions seek to collect views on possible ways forward to support biotechnology for defence and security in the EU.

* **Q4.** In your view, what **other actions at EU level** are necessary to **enhance the impact of biotechnology for defence and security in the EU**? Please substantiate your statements with views and evidence on the ways forward.

600 character(s) maximum

N/A

Section 9 - Additional information

Is there anything else you would like to add that has not been covered by this consultation?

If you wish to upload a document, you can do so here.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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Contact

SANTE-BIOTECH@ec.europa.eu