

EPTRI General Assembly and Scientific Meeting Warsaw, 28-29 July, 2026

*Past, Present and Future of Regulatory Science for
Paediatric Medicines*

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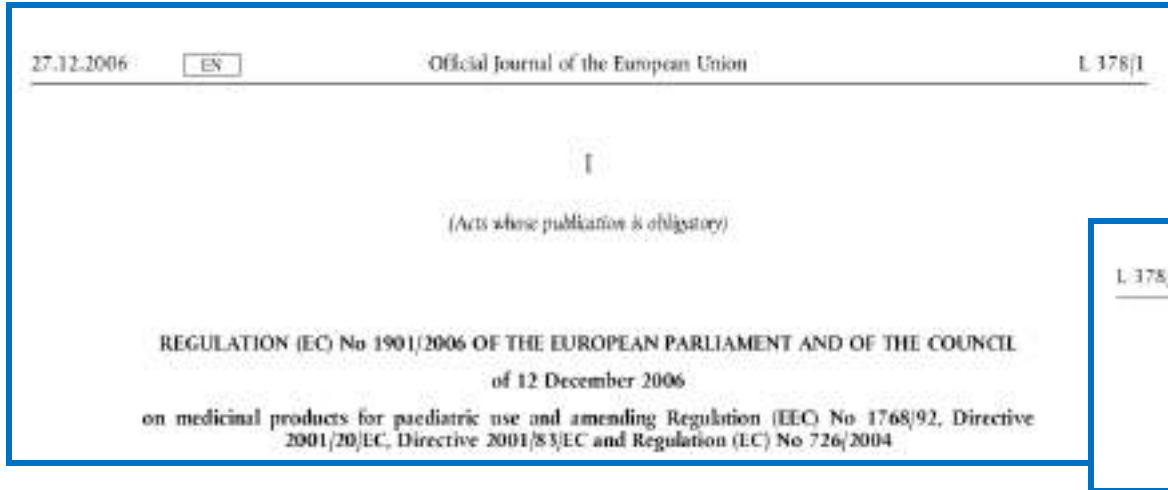
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No financial disclosure to declare

The EU Paediatric Regulation



*The 1st piece of EU
legislation that requires
pharmaceutical industry to
develop medicines for use
in a particular subset of the
patient population*

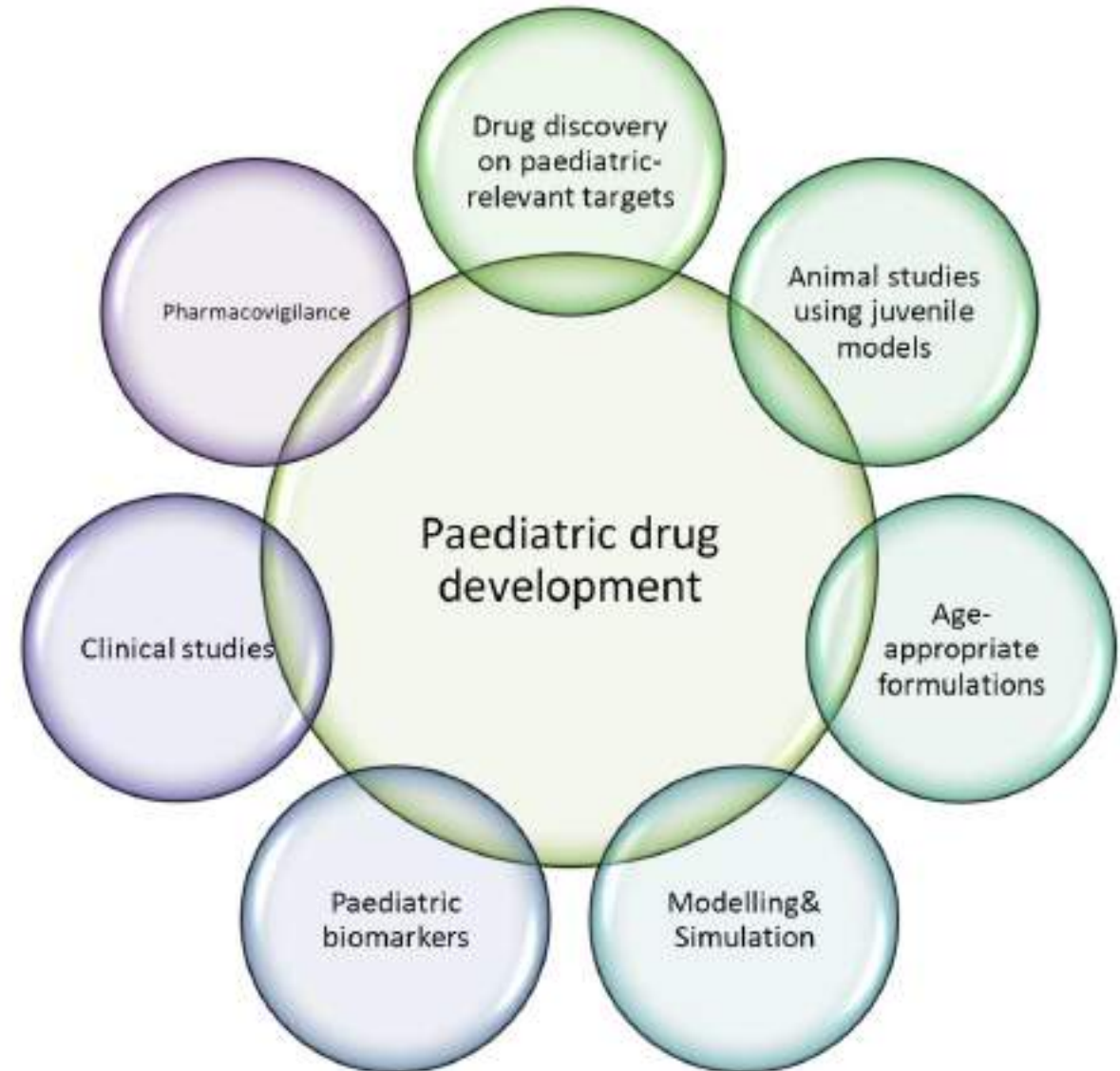
Entered into force in 2007 to facilitate R&D and availability of medicines for children

- ensuring high quality research
- avoiding unnecessary studies
- not delaying the authorisation of medicines for adults

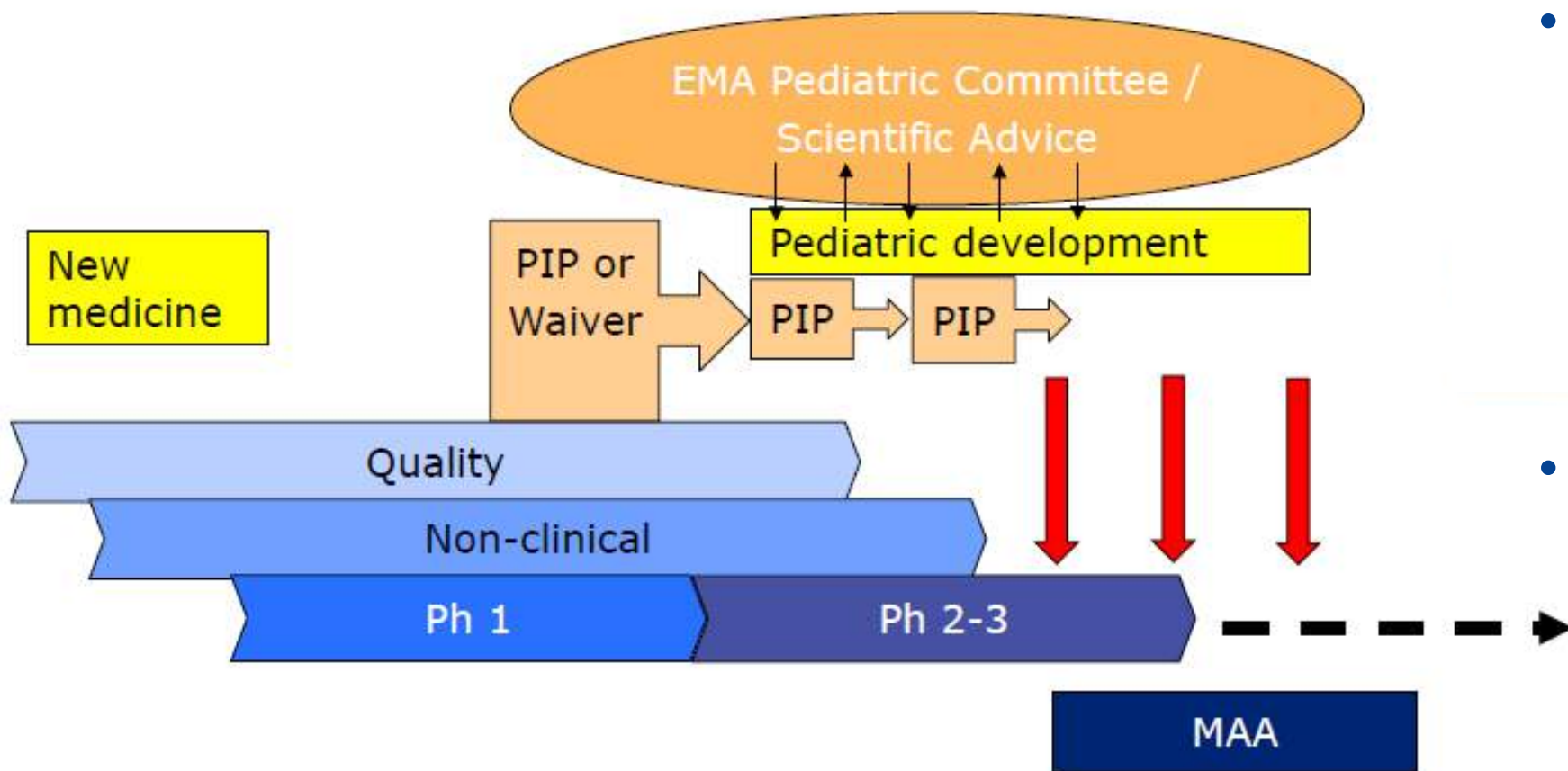


Paediatric Investigation Plan (PIP)

- obligation to conduct the **paediatric studies** in compliance with an approved PIP
- details of to demonstrate
quality
efficacy
safety
of the medicinal product for a therapeutic indication in the paediatric population



PIP within the R&D



- to be submitted **early** during product development (no later than adult phase II studies start – not after adults phase III)
- can also include **waivers** (to conduct paediatric studies) or **deferrals** (right to delay PIP completion)

Rewards and incentives

Unauthorised products

Obligation to submit results compliant with agreed PIP at the time of MAA

In-patent authorised products

Obligation to submit results compliant with agreed PIP at the time of application for new indication, route, formulation

Off-patent products

Optional PIP covering paediatric indication and formulation

6-month SPC* also in case of negative results

PUMA: 10-year data & market exclusivity

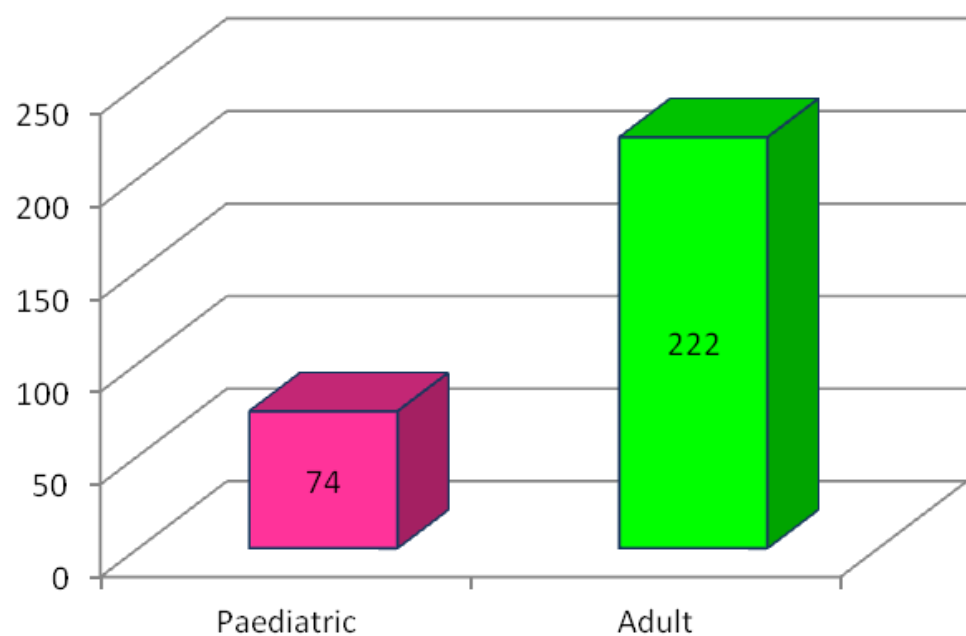
* *Supplementary Protection Certificate*

Paediatric Regulation outcomes

- ↑ paediatric medicines
- ↑ agreed PIPs
- ↓ paediatric trials

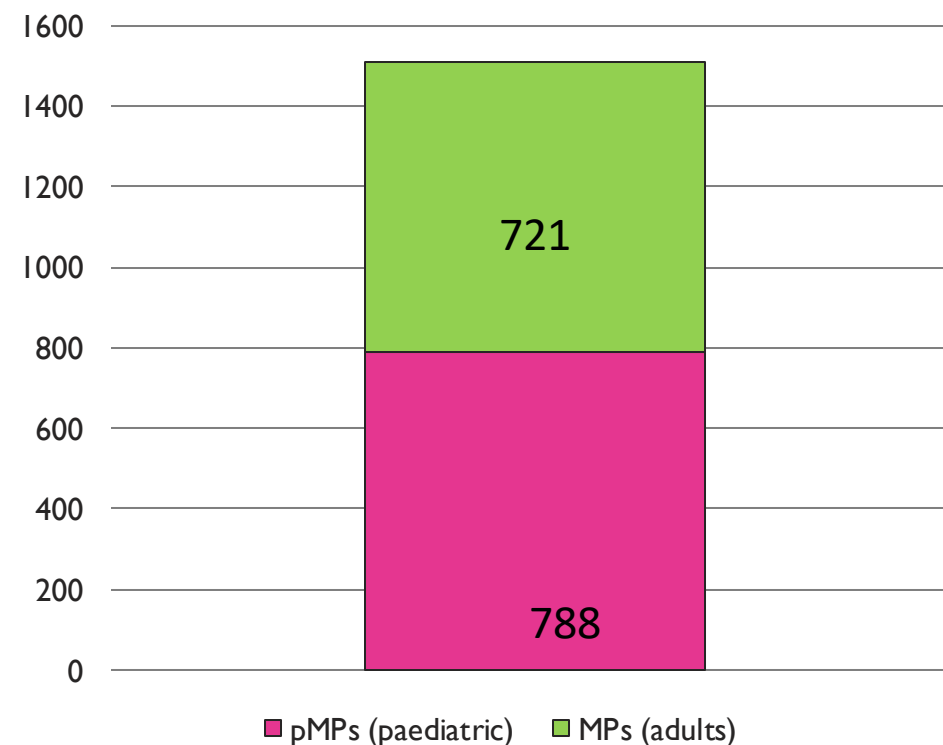
Number of authorised paediatric medicines

Centrally-approved medicines up to 2003



Ceci A. et al, EJCP 2006

Centrally-approved medicines up to 2025

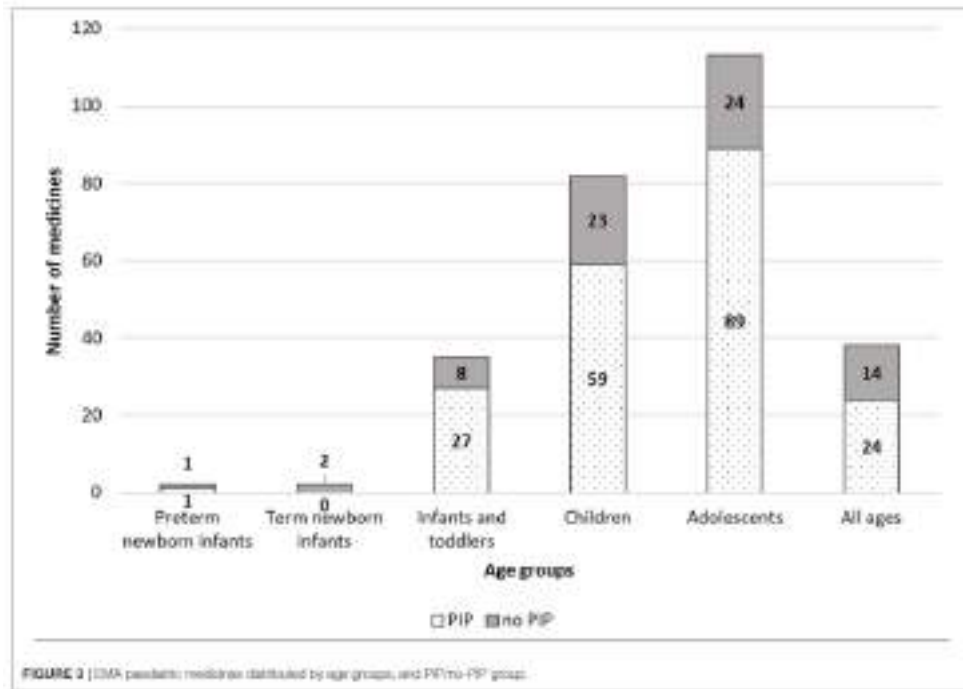


Source: European Public Assessment Reports and TEDDY e-PMD

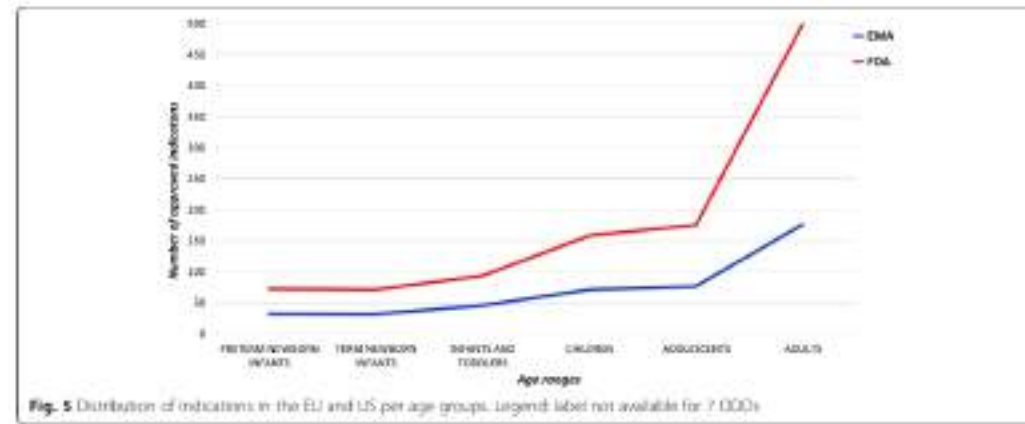
Paediatric unmet needs

- Part of unmet therapeutic needs still exists
- Many medicines not studied in children ⇒ off-label
- ~ 90% of rare diseases can begin in childhood ⇒ *‘children are orphan two times’*

EC Joint Evaluation 2020 (SWD(2020) 163 final)



Source: Toma et al, Front Med (Lausanne) 2020

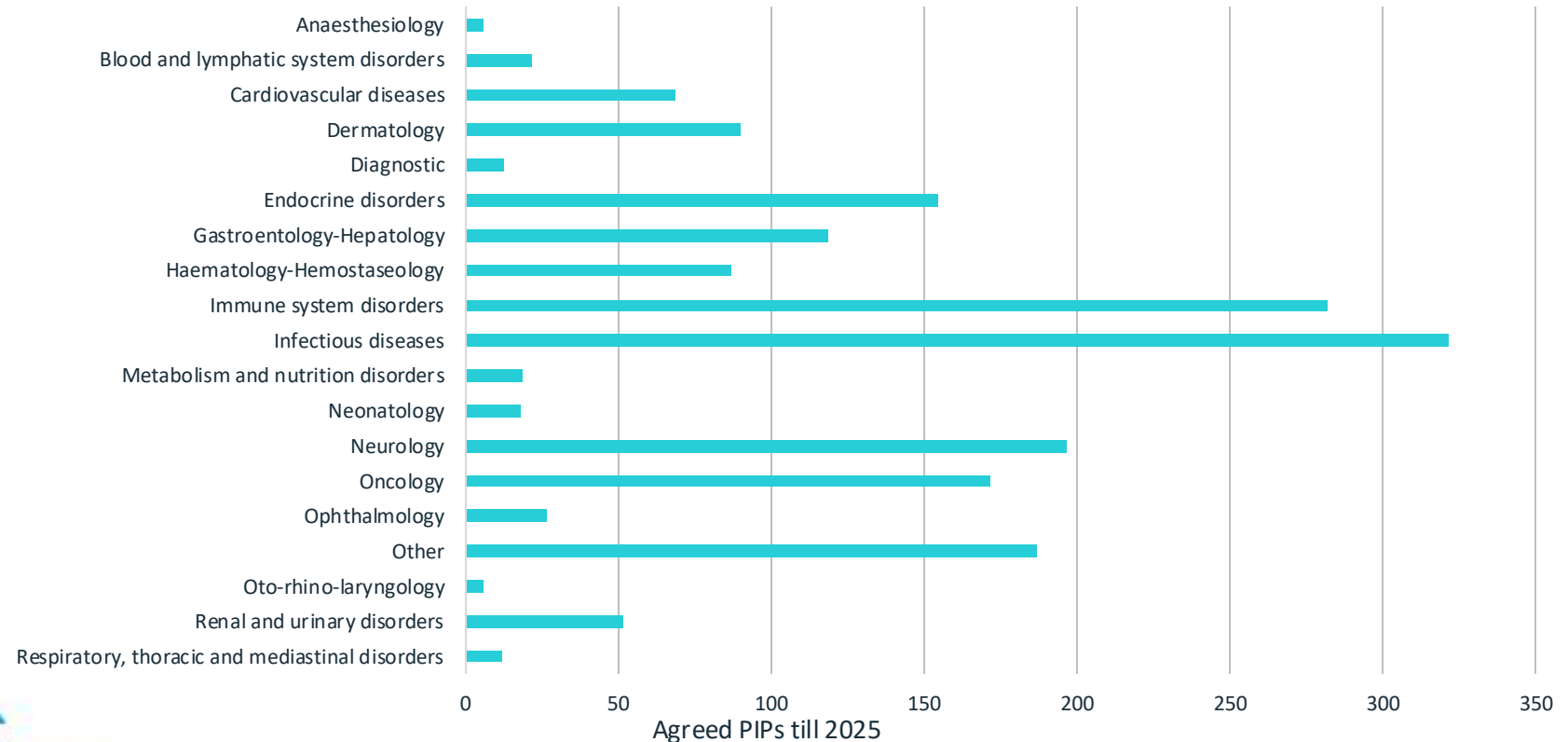


Source: Giannuzzi V et al. OJRD 2017



Number of PIPs

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	TOTAL
Full waiver granted	3	43	70	55	45	47	54	48	51	54	81	90	98	129	122	95	132	114	25	1356
PIPs agreed	0	22	41	116	46	45	53	58	66	84	69	65	82	130	145	203	267	293	70	1855



Source: EMA website

Number of PIPs and paediatric medicines

Paediatric Regulation

- PIP agreed by the PDCO
- (voluntary) PUMA

Directive 2001/83/EC

- NO PIP agreed by PDCO
- Results from pre-clinical or clinical studies to be provided

TABLE 4 | Paediatric studies characteristics.

Studies by MP	p-MPs in the PIP group (128–100%)	p-MPs in the no-PIP group (47–100%)	p-value*	p-OMPs in the PIP group** (41–100%)	p-OMPs in the no-PIP group** (16–100%)	p-value*
Study population including only children	77 (60%)	19 (40%)	0.020	24 (59%)	6 (38%)	0.153
All 3 phases studies	89 (70%)	16 (34%)	< 0.001	34 (83%)	4 (25%)	< 0.001
No. of studies by approved drug	3.3	1.6	–	4.0	1.5	–

*Chi-square test; **p-OMPs have also been counted in the previous columns.

Number of paediatric trials

In EU

- 2016: **631**/ 2880 (22% out of the total)
- 2025: **277**/ 2210 (**12,5%** out of the total)

Worldwide:

- 2016: **5111**/ 26471 (19%)
- 2025: **6629** / 38064 (**17%**)



Source: EU clinical trials register; CTIS, clinicaltrials.gov

EU research funds



- 18 agreed PIPs
- 3 PIPs completed -> 3 new PUMAs (hybrids for all paediatric ages)

Enalapril, Aqumeldi®
Paediatric formulation: orodispersible tablets

Hydrocortisone, Alkindi®
Paediatric formulation: granules

Project	Active Substance(S)	Addressed paediatric indication(s)	Therapeutic area
TINN	Ciprofloxacin*	treatment of infections in preterm and term newborns	
	Fluconazole		
TINN2	Azithromycin	treatment of infections in preterm and term newborns	
NeoMero	Meropenem	treatment of late-onset sepsis in neonates and infants aged	
NeoVanc	Vancomycin		
NeoOpioid	Morphine		
	Fentanyl		
GAPP	Gabapentin	treatment of chronic pain	
Loulla & Philla	Methotrexate*	treatment of Acute Lymphoblastic Leukemia	Malignant neoplasms
	6-Mercaptopurine*		
03K	Cyclophosphamide	treatment of paediatric malignancies	
	Temozolomide		
EPIC	Doxorubicin*	treatment of childhood cancer	
HIP trial	Dopamine	management of hypotension in preterm newborns	
NeoCirc	Dobutamine	treatment of systemic hypotension in infants	Cardiology
LENA	Enalapril	cardiac failure in children	
NEMO	Bumetanide	treatment of neonatal seizures in babies with hypoxic ischemic encephalopathy	Neurology
KIEKIDS	Ethosuximide	treatment of absence and myoclonic epilepsy	
TAIN	Hydrocortisone*	treatment of adrenal insufficiency in neonates and infants	Endocrinology
METE177	Metformin	treatment of polycystic ovary syndrome	
CloSed	Clonidine*	Sedation in intensive care	Intensive care/anaesthesiology
DEEP	Deferiprone*	treatment of chronic iron overload	Haematology
PERS	Risperidone	treatment of conduct disorder treatment of schizophrenia	Child & adolescent psychiatry
NEuroSIS	Budesonide*	prevention of bronchopulmonary dysplasia	Respiratory and cardiovascular disorders

Dopamine, Neoatrimon®
Paediatric formulation: new IV solution

* received an Orphan Drug designation (four in the same indication addressed by the project)

Current revision of the Regulation



What didn't work?

- Paediatric unmet needs still relevant in certain areas e.g. paediatric-only diseases, neonates
- Administrative burden / complexity of the PIP procedure
- Delayed conduct of paediatric studies
- Interaction between PDCO and other EMA committees/working parties/groups
- Unattractive PUMA



Revision of Paediatric Regulation as part of the EU Pharma legislation revision



The EU pharmaceutical system is undergoing major reform through a new Regulation and Directive redefining the authorisation of medicines



Upcoming rules

Reg (EC) 726/2004

Reg (EC) 141/2000

Reg (EC) 1901/2006

Dir. 2001/83/EC

Regulation

Directive

+ annexes





Upcoming rules

Regulation

Reg (EC) 1901/2006

Directive

+ annexes



**Paediatric Regulation
to be repealed**

ANNEX VIII		
CORRELATION TABLE [TO BE UPDATED]		
Directive 2001/83 (EC)	Regulation (EC) No 1901/2006	This Directive
Art. 2(1)		Art. 1(1) and (2)
Art. 2(2)		Art. 1(4)
Art. 3(3)		Art. 1(3) and 1(2)(1), second sentence
Art. 3(1), (2) and (3)		Art. 1(5), point (a), (b) and (c)

Modifications to Paediatric Regulation



- To simplify procedures
- To remove inconsistencies between opinions

**a working party
with scientific
expertise on
paediatric
medicinal products**

Modifications to Paediatric Regulation

- Experts from national competent authorities (NCAs) -> *broadest possible geographical distribution*
- Minimum number of experts from NCAs -> *prioritised over external experts in a specific expertise area*
- Representatives of patients, healthcare professionals and academia as possible members
- NCAs not represented allowed attending meetings as observers
- Documents discussed accessible to all NCAs



a *working party* with scientific expertise on paediatric medicinal products

Modifications to Paediatric Regulation

Regulation

CHAPTER VII PAEDIATRIC MEDICINAL PRODUCTS

Article 74

Paediatric investigation plan

1. A paediatric investigation plan shall specify the timing and all the measures proposed to assess the quality, safety and efficacy of the medicinal product in all subsets of the paediatric population that may be concerned. In addition, it shall describe any measures to adapt the pharmaceutical form, the strength, the route of administration and the eventual

- PIPs
- Waivers
- Validation
- Agreement
- Deferrals
- Modifications
- Compliance
- Decisions
- Discontinuation
- Scientific Advice
- Data from PIPs
- MA variations
- PUMA
- Paediatric trials information
- EU network
- Incentives
- Fees waivers
- Yearly reporting

CoE final compromise text of the Regulation

Modifications to Paediatric Regulation

- Definitions

- (37) 'paediatric investigation plan' means a research and development programme aimed at ensuring that the necessary data are generated determining the conditions in which a medicinal product may be authorised to treat the paediatric population;
- (38) 'paediatric population' means that part of the population aged between birth and *under* 18 years;

- Paediatric information

CONTENTS OF SUMMARY PRODUCT CHARACTERISTICS

The summary of product characteristics shall contain, in the order indicated below, the following information:

- (1) name of the medicinal product followed by the strength and the pharmaceutical form;
- (2) qualitative and quantitative composition in terms of the active substances and of the excipient, knowledge of which is essential for proper administration of the medicinal product. The usual common name or chemical description shall be used;
- (3) pharmaceutical form;
- (4) clinical particulars:
 - (a) therapeutic indications;
 - (b) posology and method of administration for adults and, where necessary for children;
 - (c) contra-indications;
 - (d) special warnings and precautions for use and, in the case of immunological medicinal products, any special precaution to be taken by persons handling such medicinal products and administering them to patients, together with any precaution to be taken by the patient;

Directive

SECTION 7 SPECIFIC REQUIREMENTS FOR PAEDIATRIC MEDICINAL PRODUCTS

Article 48

Compliance with the paediatric investigation plan

1. The competent authority of the Member State responsible for the authorisation or variation of a marketing authorisation in accordance with this Chapter or of the Chapter VIII, shall ensure compliance with the requirements laid down in Article 6(5).

- PIP compliance
- Data from PIPs in MSs

Chapter VII

Regulatory protection, unmet medical needs and reward for paediatric medicinal products

- Rewards (+ 6month SPC or +1 year market protection for new indications bringing significant benefit)

NEW

Modifications to PIP procedure

LENGTH OF DEFERRAL

capped to 5 years (prolonged in 'justified cases')

ASSESSMENT

EMA + CHMP consultation (+ WPs)

TIMELINES

~~60+60~~ $\Rightarrow$ **90+90** days (70+70 for initial PIPs)

'INITIAL' PIP

only known details and timing of measures

Initial PIP

Criteria

- **active substance not yet authorised** in any medicine in EU and intended to diagnose/prevent/treat a **novel or an existing paediatric condition via a new mechanism of action**; or
- following acceptance by EMA of a duly justified request



- only details and timing of measures proposed to assess quality, safety and efficacy in all paediatric subsets concerned, **known** at the time of application
- precise timing of when updated versions and final PIP are expected to be submitted to EMA on the basis of scientifically justified reasons

New obligations and measures



- EMA may impose a **PIP based on the Mechanism of Action (MoA)** of the drug (action directed at a specific molecular target or biological pathway) relevant for a different disease in children **in the same therapeutic area**



- **PUMA incentive: ~~10 year ME~~ ⇒ same market protection of the other repurposed products** for off-patent paediatric products

New obligations and measures



- **Free of charge SA** also for in utero treatments



- Possible **temporary waiver** during **public health emergencies**



- A **dedicated section on medicines authorised in paediatrics** foreseen within the public EMA database of medicines

Modifications to Paediatric Regulation

EMA shall develop a EU network of *patient representatives, academics, medicines developers*, investigators and centres with expertise in paediatric studies

- to discuss **priorities** in clinical development of medicines for children, in particular in areas of unmet needs
- to **coordinate studies** relating to paediatric medicines
- to build up the necessary scientific and administrative **competences** at EU level
- to avoid **unnecessary duplication** of paediatric studies



network of research networks, investigators and centres with expertise in paediatric studies

- sharing good practices
- promoting research into medicines for children
- building necessary competences at EU level
- dialoguing with ethics committees
- avoiding unnecessary duplication of studies

Modifications impacting to paediatric medicines

Modifications impacting to paediatric medicines

PRODUCTS ADDRESSING 'UNMET MEDICAL NEEDS'

- Life threatening or severely debilitating disease AND
 - No medicinal product authorised in EU OR
 - Clinically relevant improvement of efficacy or safety

Nothing paediatric-specific....



*Lists of paediatric
unmet needs*

Modifications impacting to paediatric medicines

REPURPOSING TO COVER UNMET NEEDS

- ☺ Not-for-profit entities may submit non-clinical or clinical evidence for a new therapeutic indication for unmet needs
- ☺ MAH can submit additional evidence
- ☺ Opinion favourable $\Rightarrow$ MAH shall submit a variation to update the product information with the new therapeutic indication



A DEDICATED ARTICLE IN THE REGULATION!

CoE final compromise text of the Regulation, art 48

Other proposals: repurposing



- Paediatric- appropriate formulations are still lacking
- No definition/term currently stated by EU law...and still lacking in the proposed revision of legislation!

In our opinion, an age-appropriate formulation, targeting a relevant off-label use in children, even for a disease or condition already authorised in adults or older children, would qualify as 'reformulation' within the repurposing term



The repeal of the EU Paediatric Regulation has raised concerns about possible impact on R&D and availability of paediatric medicines



Key Issues

Dispersion of paediatric expertise at EMA

Weakening of Paediatric Investigation Plan (PIP) obligations

Reduced incentives for paediatric innovation and repurposing

Limited mechanisms to identify paediatric unmet needs

Lack of dedicated funding

EPTRI Proposed Measures

Dedicated, permanent Paediatric Working Party/Group at EMA

Preservation and strengthening of PIP obligations

Support for innovative and repurposed paediatric medicines

Improved identification of paediatric unmet needs

Dedicated funding for paediatric research



Figure 2. Key issues identified in the EU pharmaceutical reform and EPTRI proposed measures in 2023

Robust, mandatory paediatric regulatory pathways are essential to protect children's health.

Paediatric medicines call for dedicated expertise, strong obligations, and sustained investment, while the EU pharmaceutical legislation reform risks to leave children care behind

Wrap up & conclusions

Commitment to ensure robust, mandatory paediatric regulatory pathways and prioritisation of paediatric needs in the new EU legislation

Key players in regulatory and public health

- [European Platform for Regulatory Science Research](#)
- paediatric networks
- patient's organisations



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