# 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 <u>Communication on Biotechnology and Biomanufacturing</u> (March 2024) and the reports by <u>Enrico Letta</u> (April 2024) and <u>Mario Draghi</u> (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 <u>2024-2029 political guidelines</u> 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 <u>EU Bioeconomy Strategy</u>, the AI in science Strategy, the Vision for Agriculture and Food, the <u>European Innovation Act</u>, the <u>EU Start-Up and Scale-up Strategy</u>, the <u>Union of Skills</u> and the <u>Savings and Investment Union</u>. 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

Swedish

Croatian
Czech
Danish
Dutch
<sup>©</sup> English
<sup>®</sup> Estonian
Finnish
French
German
<sup>©</sup> Greek
Dungarian Dungarian
<sup>®</sup> Irish
<sup>D</sup> Italian
Datvian Datvian
Lithuanian
Maltese
Polish
Portuguese
Romanian
Slovak
Slovenian
Spanish

*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
You have identified yourself as a business association or a company/business.
Please indicate whether you belong to one of the following areas:
Company conducting research and/or development in biotechnology and/or biomanufacturing
Company supplying materials or equipment to the biotechnology manufacturing sector (e.g. strains, bioreactors)
Biotechnology manufacturer
Biotechnology distributor or retailer
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
You have identified yourself as a private investor in the biotechnology sector. Please
indicate the type of investment you provide:
Business Angel
Venture Capital

Corporate Venture Capital (CVC)
Private equity
Other
Are you or the organisation you represent part of a <b>eluctor</b> or of a <b>eluctor</b>
Are you or the organisation you represent part of a <b>cluster</b> or of a <b>cluster</b>
organisation?
'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]
Yes
No
I don't know/Not applicable
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.
Tod dan soledt manipie 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
Other areas of biotechnology
Not applicable
If a different agetor of histochnology is relevant to you ar the argenization you
If a different sector of biotechnology is relevant to you or the organisation you represent, please specify.
represent, please specify.
*First name
*Surname
*Email (this wan't be published)
*Email (this won't be published)
*Scope
International
© Local
National
Regional
*Level of governance
Cocal Authority
Local Agency
*Level of governance
Parliament
Authority

## Agency

oloyees)		
mployees)		
19 employees)		
ore)		
number		
	r. It's a voluntary database for	organisations seeking to
	a retaining database io	organications seeming to
gin, or that of your organisa	ition.	
•		rd to the legal status or policy of
		Saint Martin
		Saint Pierre and
Dominica	Liechtenstein	Miquelon
Dominican	◯ Lithuania	Saint Vincent
	Littidama	and the
Периопе		Grenadines
© Foundor	Luxemboura	Samoa
		San Marino
371		São Tomé and
El Salvadol	Madagascai	Príncipe
© Equatorial Cui	aco 🍭 Malawi	Saudi Arabia
		Senegal
	gin, or that of your organisate official position of the Eutharmonisation of often diversity Dipibouti Dominica Dominican Republic Ecuador Egypt El Salvador	mployees) 49 employees) pre) number In the transparency register. It's a voluntary database for sign, or that of your organisation.  It is a voluntary database for sign, or that of your organisation.  It is and practices.  Dijibouti  Dijibouti  Dominica  Libya  Dominica  Liechtenstein  Dominican  Republic  Ecuador  Luxembourg  Macau  El Salvador  Madagascar  Equatorial Guinea  Malawi

Antarctica	Estonia	Maldives	Serbia
Antigua and	Eswatini	Mali	Seychelles
Barbuda			
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	Marshall Islands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	<sup>◎</sup> Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	Solomon Islands
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	French Southern	Moldova	South Georgia
	and Antarctic		and the South
	Lands		Sandwich Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar/Burma	Svalbard and
			Jan Mayen
Bolivia	Grenada	Namibia	Sweden
Bonaire Saint	Guadeloupe	Nauru	Switzerland
Eustatius and			
Saba			
Bosnia and	Guam	Nepal	Syria
Herzegovina			
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
©	Guinea-Bissau	Nicaragua	Thailand

	British Indian						
	Ocean Territory						
0	British Virgin		Guyana	0	Niger	0	The Gambia
	Islands						
0	Brunei		Haiti		Nigeria	0	Timor-Leste
0	Bulgaria		Heard Island and		Niue	0	Togo
			McDonald Islands	}			
0	Burkina Faso		Honduras		Norfolk Island	0	Tokelau
0	Burundi		Hong Kong	0	Northern Mariana	0	Tonga
					Islands		
0	Cambodia		Hungary		North Korea	0	Trinidad and
							Tobago
0	Cameroon		Iceland		North Macedonia	0	Tunisia
0	Canada		India		Norway	0	Türkiye
0	Cape Verde		Indonesia		Oman	0	Turkmenistan
0	Cayman Islands		Iran		Pakistan	0	Turks and
							Caicos Islands
0	Central African		Iraq		Palau	0	Tuvalu
	Republic						
0	Chad		Ireland		Palestine	0	Uganda
0	Chile		Isle of Man		Panama	0	Ukraine
0	China		Israel	0	Papua New	0	United Arab
					Guinea		Emirates
0	Christmas Island		Italy		Paraguay	0	United Kingdom
0	Clipperton		Jamaica		Peru	0	United States
0	Cocos (Keeling)		Japan	0	Philippines	0	United States
	Islands						Minor Outlying
							Islands
0	Colombia	0	Jersey	0	Pitcairn Islands	0	Uruguay
0	Comoros	0	Jordan	0	Poland	0	US Virgin Islands
0	Congo		Kazakhstan	0	Portugal	0	Uzbekistan
	Cook Islands		Kenva		Puerto Rico		Vanuatu

Costa Rica	Kiribati	Qatar	Vatican City
Côte d'Ivoire	Kosovo	Réunion	Venezuela
Croatia	Kuwait	Romania	Vietnam
Cuba	Kyrgyzstan	Russia	Wallis and
			Futuna
Curaçao	Laos	Rwanda	Western Sahara
Cyprus	Latvia	Saint Barthélemy	y <sup>©</sup> Yemen
Czechia	Lebanon	Saint Helena	Zambia
		Ascension and	
		Tristan da Cunha	a
Democratic	Lesotho	Saint Kitts and	Zimbabwe
Republic of the		Nevis	
Congo			
Denmark	Liberia	Saint Lucia	

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

The type of respondent that you responded to this consultation as, your 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.

## Public

Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

#### \*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	0	0	0	0	0	0
* Biotechnology and biomanufacturing can positively impact the EU society	•	•	0	0	0	0
* Biotechnology and biomanufacturing can positively impact the environment	0	0	0	0	0	0
* Biotechnology and biomanufacturing products that reach the EU market are safe and secure	0	0	0	0	0	0
* Information to users and consumers on biotechnology and biomanufacturing is available and accessible	0	0	0	0	0	0

* Consumes are willing to pay a						
price premium for	0	0	0	0	0	©
biotechnology and						
biomanufacturing products						

## Section 1\* - Presence of business in the EU market

Q1. You are asked the following question as you are replying on behalf of a company/business.

What has been the approximate share of your global revenues generated in the EU in the last two years (2023-2024)?

Less than 25%

Between 26% and 50%

Between 51% and 75%

More than 75%

No revenues generated in the EU

Q1a. If you would like to explain why you are not present in the EU market, you can do so here:

600 character(s) maximum

# 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	0	0	0	0	0	0
* In product development	0	0	0	0	0	0
* In pre-commercial testing or clinical trials	0	0	0	0	0	0
* In the assessment and in obtaining authorisation to market products	0	0	0	0	0	0
*						

In techno-economics (outside of health) or health technology assessment	0	©	0	0	0	0
* In commercialising products	0	0	0	0	0	0
* In scaling-up production or manufacturing	0	0	0	0	0	•
* In post-market activities, including monitoring and surveillance	0	0	0	0	0	0

600 character(s) maximum	
•	catements with <b>additional evidence</b> on the <b>challenge</b>
s resulting from the EU regulation 600 character(s) maximum	tory environment.
Coo character(3) maximum	
• •	ect views on possible ways forward to simplify and streamline cable to biotechnology and biomanufacturing products.
O4 le vous view what actions	<b>at Fullevel</b> are necessary to <b>improve the</b>
•	•
regulatory environment for b	piotechnology and biomanufacturing in the EU?
Please substantiate your staten	•
regulatory environment for b	piotechnology and biomanufacturing in the EU?
regulatory environment for believes substantiate your staten	piotechnology and biomanufacturing in the EU?
regulatory environment for believes substantiate your staten	piotechnology and biomanufacturing in the EU?

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 <b>predictable</b>	0	0	0	0	0	0
is less complex and clearer	0	0	0	0	0	0
leads to lower <b>costs</b> for <b>complying</b> with the regulation	0	0	0	0	0	0
enables biotechnology and biomanufacturing products to reach the market faster	0	0	0	0	0	0
ensures a higher level of safety and security	0	0	0	0	0	0

<b>Q5a.</b> Regarding predictability: Please indicate the reasons why, and in which third-country(ies) this applies.
600 character(s) maximum
<b>Q5b.</b> Regarding complexity and clarity: Please indicate the reasons why, and in which third-country(ies) this applies.
600 character(s) maximum
Q5c. Regarding compliance costs: Please indicate the reasons why, and in which third-country(ies) this applies.  600 character(s) maximum
<b>Q5d.</b> Regarding speed of reaching the market: Please indicate the reasons why, and in which third-country(ies) this applies.  600 character(s) maximum
<b>Q5e.</b> Regarding the level of safety and security: Please indicate the reasons why, and in which third-country(ies) this applies.  600 character(s) maximum

Q6	6. Please indicate any other relevant factors that characterise the regulations
in	non-EU countries and that are applicable to biotechnology and biomanufacturing
pro	oducts.
60	00 character(s) maximum

# **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)	0	0	0	0	0	•
* Debt and equity instruments (e. g. European Innovation Council, European Investment Bank, Strategic Technologies for Europe Platform)	•	•	•	•	•	•
* Commercialisation support	0	0	0	0	0	0
* Support to capacity expansion	0	0	0	0	0	0

# 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	0	0	0	0	0	0
* Venture capital: Start-up/early stage (Series A)	0	0	0	0	0	0
* Venture capital: Expansion stage (Series B)	0	0	0	0	0	0
* Venture capital: Growth stage (Series C, etc)	0	0	0	0	0	0
* Debt financing	0	0	0	0	0	0
* Private equity	0	0	0	0	0	0
Strategic research or sales     partnerships and collaborations	0	0	0	0	0	0
* Publicly listing (Initial Public Offering (IPO))	0	0	0	0	0	0
* Capital markets/shareholders	0	0	0	0	0	0
* Corporate funding (from other companies in the market)	0	0	0	0	0	0

biotechnology sector in the EU?
Yes
O No
I don't know
<b>Q3a.</b> Please indicate <b>other relevant private and public financial instruments</b> .  600 character(s) maximum

\*Q3. In your views, are there other financial instruments relevant for the

# **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	0	0	0	0	0	0
* 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	0	0	0	0	0	0
* Access to data held by public sector bodies	0	0	0	0	0	0
* Experienced management team	0	0	0	0	0	0
* Robust supply chain	0	0	0	0	0	0
* Regulatory certainty (e.g. length and predictability of authorisation process)	0	0	0	0	0	•

* Financial health and projections	0	0	0	0	0	0
<b>Q5.</b> Please indicate <b>other fac</b>	tors that	drive inv	estmen	<b>t</b> in a bi	otechnolo	gy and/or
biomanufacturing company he	re.					
1000 character(s) maximum						
<b>Q6.</b> When seeking investment	s, is the E	U <b>a prio</b> r	ity regio	<b>on</b> unde	er the grow	/th
strategy of the organisation you	u represe	ent?				
Yes						
No						
I don't know						
<b>OSa</b> If you would like to indica	ito <b>why</b> v	rou can de	s co boro			
<b>Q6a.</b> If you would like to indica 600 character(s) maximum	ne wily,	ou can uc	so nere	·-		
ooo onarasion(s) maximum						
Q7. Is the EU a priority regio	<b>n</b> under y	your inves	tment str	ategy?		
Yes						
No						
I don't know						
Q7a. If you would like to indica	ite <b>whv</b> v	ını can do	so here			
600 character(s) maximum	<b>Wily,</b> )	you can ac	) 30 HCTC	·•		
(7)						

\* Sufficient protection of

intellectual property

<b>s</b> rel	Please substantiate your statements with <b>additional evidence</b> on the <b>challenge</b> ated to <b>access to finance in the EU</b> .  character(s) maximum
	ollowing questions seek to collect views on possible ways forward to support access to ce in the EU.
* Q9.	In your view, what actions at EU level are necessary for the public sector to
attra	act/derisk private investments in biotechnology and/or biomanufacturing?
Plea	ase substantiate your statements with views and evidence on the ways forward.
You	can provide references of successful schemes existing at EU level, national
	l or in other jurisdictions to attract private capital in biotechnology.
high	In your view, what actions at EU level are necessary to prioritise funding for a-risk and high-reward biotechnology research and innovation? Please stantiate your statements with views and evidence on the ways forward.
	character(s) maximum
*Q11	In your view, what <b>other actions</b> are necessary at EU level? Please
	stantiate your statements with views and evidence on the ways forward.

# 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	0	0	0	0	•	•
* Insufficient presence of industrial players	0	0	0	0	0	0
* Insufficient higher education or vocational training institutions	0	0	0	0	0	0
* Insufficient startup incubators or business support infrastructure (providing for example regulatory affair support)	0	0	0	0	0	•

* Lack of technology transfer offices	0	0	0	0		©
* Incapacity to reach a critical mass of stakeholders	0	0	0	0	0	0
* Insufficient public support	0	0	0	0	0	0
* Insufficient collaboration among existing clusters	0	0	0	0	0	0
* Insufficient financial support	0	0	0	0	0	0
Please substantiate your aced by <b>biotechnology c</b> O character(s) maximum						

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

iu cnaractei	r(s) maximum			

# **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	0	0	0	0	0	0
* High cost of raw material and/or of the operations	0	0	0	0	0	0
* High energy costs	0	0	0	0	0	0
* Other operational costs	0	0	0	0	0	0
* Limitations in logistics and physical infrastructure	0	0	0	0	0	0
* Vulnerabilities in supply chains and strategic dependencies	0	0	0	0	0	0
* Labour costs	0	0	0	0	0	0
* Inconsistent environmental and sustainability policies or lack of a policy	0	0	0	0	0	0
*						

(e.g. tax credits, import duties)						
* Global competition	©	0	0	0	0	0
Difficulty scaling up from pilot to industrial production	0	0	0	0	0	0
* Maintaining product quality and consistency at scale	0	0	0	0	0	0
2. Please indicate other cha	allenges	impactin	g bioted	hnolog	y manufa	acturing
600 character(s) maximum						
3. Please substantiate your simpacting biotechnology 600 character(s) maximum					<b>ce</b> on the	challenç
impacting biotechnology 600 character(s) maximum  ne following question seeks to co	manufac	on possibl	the EU.	ward to s	upport biot	echnology
impacting biotechnology 600 character(s) maximum  ne following question seeks to contain the EU.  4. In your view, what actions	manufac	on possible	e ways for	<b>ward to s</b> / to <b>enh</b>	support biot	echnology
impacting biotechnology 600 character(s) maximum  ne following question seeks to co	manufac	on possiblevel are not the EU?	e ways for	<b>ward to s</b> / to <b>enh</b>	support biot	echnology

# 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.)	0	0	0	0	0	0
* Insufficient STEM education graduates (STEM: Science, Technology, Engineering, Mathematics)	•	0	0	•	•	•
* Insufficient research and technical skills	0	0	0	0	0	0
* Insufficient regulatory and quality assurance expertise	0	0	0	0	0	0
* Insufficient digital and data science skills	0	0	0	0	0	0
* Insufficient intellectual property skills	0	0	0	0	0	0
* Limited financial, entrepreneurial skills and mindsets	0	0	0	0	0	0

To what extent do you ag			_	rs lead	to the EU	
<b>3</b>	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not applicable /I don't know
Difficulty in attracting,    developing and retaining global    talent	0	0	0	0	0	0
Misalignment between     education and industry needs	0	0	0	0	0	0
* 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)	•	•	•	0	•	0
<ul> <li>Insufficient public and private investment in skilled workforce</li> </ul>	0	0	0	0	0	0

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

26. In vour vi		ns at EU lev	<b>/el</b> are nece	ssarv to <b>en</b>	hance speciali	se
raining prog	grammes/curr on the ways for	icula? Pleas		-	tements with vie	
<b>cientists to</b> nowledge tra	launch a busi ansfer and idea dence on the w	<b>iness</b> (e.g. the testing, etc.)	nrough incul ? Please su	oators, pilot	hance support facilities for our statements	
attract tal	ent from other	r geographi	cal areas?	Please sub	oport <b>programn</b> estantiate your	nes
ouu character(s)	maximum					

•	r view, what <b>other actions at EU level</b> are necessary for the availability,
	and reskilling of the biotechnology workforce? Please substantiate your
	s with views and evidence on the ways forward.
600 Characte	er(s) maximum
Section	7 - Data and Artificial Intelligence
	g questions seek to collect views on the challenges related to access to data and on
the developi	ment, deployment and use of Artificial Intelligence (AI) in biotechnology.
<b>*Q1.</b> Are yo	u or the organisation you represent having difficulties in accessing or
using rele	evant data for the development of biotechnology or biomanufacturing
products?	
Yes	
No	
Partia	ally
Not a	pplicable/I don't know
Q1a. What	barriers are you currently facing?
	er(s) maximum
* <b>Q2</b> - Are vo	u or the organisation you represent relying on <b>data sourced from</b>
•	f the EU/EEA for the development of biotechnology and biomanufacturing
	nd services?
© Yes	
© No	
	pplicable/I don't know
NOT 8	pplicable/Tdofft Kilow
Q2a. What	are the main reasons for relying on data sourced from outside of the EU
/EEA?	

Clear legal framework for access to data
Less strict requirements for compliance with privacy and data protection
More favourable IP rules
Available datasets are more reliable and of a higher quality
Access to data is less costly
Other
Q2b. Please specify what the other reasons are.
600 character(s) maximum
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

\*Q4a. In what capacity does your organisation expect to be involved in the European Health Data Space? Please select the capacity(ies) that is/are most relevant for you.

Data user
Data holder
Health Data Access Body
Authorised participant to HealthData@EU infrastructure (e.g. as a health-related
research infrastructure or other data-sharing infrastructure)
Health Data Intermediation Entity
Single Trusted Data Holder
Cross-border registry
Other
<b>Q4b.</b> What are the specific challenges related to the implementation of the EHDS that you or the organisation you represent encounter?  600 character(s) maximum
<b>Q5.</b> 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

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 Al-based Biotechnology Products:** Biotech companies developing Al-powered products or services and deploying these products into real-world settings (e.g.Al-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 Al 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 Al users and/or deployers, concerns over liability, concerns surrounding data security and privacy etc)	•	•	•	•	•	•
* Organisational and business challenges (e.g. lack of enduser involvement in the						

development and deployment of Al tools, lack of added value assessment in deploying Al, lack of Al strategy for use /deployment in the entity)	•	•	0	•	•	•
* Social and cultural challenges (e.g. lack of trust in Al tools, lack of digital literacy among users/deployers/the public, concerns on job security, concerns surrounding overreliance on Al tools, etc	•	•	•	•	•	

# **Q7.** To what extent do you agree that **the deployment of Al-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 Al users and/or deployers, concerns over liability, concerns surrounding data security and privacy etc)	•	•	•	•	•	•
* Organisational and business challenges (e.g. lack of enduser involvement in the						

development and deployment of Al tools, lack of added value assessment in deploying Al, lack of Al strategy for use /deployment in the entity)	•	©	©	•	•	•
* Social and cultural challenges (e.g. lack of trust in Al tools, lack of digital literacy among users/deployers/the public, concerns on job security, concerns surrounding overreliance on Al tools, etc	•	•	•	•	•	©

data, the use of Al In R&D, and deployment of Al-based blotech products in the EU blotechnology sector here.  600 character(s) maximum  The following questions seek to collect views on possible ways forward to support the deployment and use of Al and data in blotech.  Q9. In your view, what actions at EU level are necessary to enhance the use of Al in R&D in blotechnology in the EU?  600 character(s) maximum  Q10. In your view, what actions at EU level are necessary to enhance the deployment of Al-based blotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to the analysis of high-performance computers (HPC), etc.)?  600 character(s) maximum	data, the use	
The following questions seek to collect views on possible ways forward to support the deployment use of AI and data in biotech.  29. In your view, what actions at EU level are necessary to enhance the use of AI n R&D in biotechnology in the EU?  600 character(s) maximum  210. 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  211. In your view, what other actions should be prioritised at EU level related to the analysis and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	-	
The following questions seek to collect views on possible ways forward to support the deployment use of Al and data in biotech.  29. In your view, what actions at EU level are necessary to enhance the use of Ann R&D in biotechnology in the EU?  600 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deployment of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	he EU biotec	hnology sector here.
29. In your view, what actions at EU level are necessary to enhance the use of A in R&D in biotechnology in the EU?  200 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deployent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	600 character(s) m	naximum 
29. In your view, what actions at EU level are necessary to enhance the use of A in R&D in biotechnology in the EU?  200 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deployent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
29. In your view, what actions at EU level are necessary to enhance the use of A in R&D in biotechnology in the EU?  200 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deployent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
29. In your view, what actions at EU level are necessary to enhance the use of A in R&D in biotechnology in the EU?  200 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deployent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
29. In your view, what actions at EU level are necessary to enhance the use of Ann R&D in biotechnology in the EU?  200. In your view, what actions at EU level are necessary to enhance the deploy and of Al-based biotechnology products in the EU?  200. In your view, what actions at EU level are necessary to enhance the deploy and of Al-based biotechnology products in the EU?  201. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
Q9. In your view, what actions at EU level are necessary to enhance the use of An R&D in biotechnology in the EU?  600 character(s) maximum  Q10. In your view, what actions at EU level are necessary to enhance the deployent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	The following que	estions seek to collect views on possible ways forward to support the deployme
n R&D in biotechnology in the EU?  600 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deploy ent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	and use of Al and	l data in biotech.
n R&D in biotechnology in the EU?  600 character(s) maximum  210. In your view, what actions at EU level are necessary to enhance the deployent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	<b>30</b> In vour vio	w what actions at Ell lovel are passeary to appared the use of f
210. In your view, what actions at EU level are necessary to enhance the deploy ent of Al-based biotechnology products in the EU?  600 character(s) maximum  211. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	•	·
Q10. In your view, what actions at EU level are necessary to enhance the deploy ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		-
ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to the and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	600 character(s) if	iaximum
ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to a and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to the and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to the and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to the and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
ent of Al-based biotechnology products in the EU?  600 character(s) maximum  Q11. In your view, what other actions should be prioritised at EU level related to the and Al in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
Q11. In your view, what other actions should be prioritised at EU level related to a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
Q11. In your view, what other actions should be prioritised at EU level related to a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	<b>210.</b> In your vie	ew, what <b>actions at EU level</b> are necessary to enhance the <b>deploy</b> e
a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?		
a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	ent of Al-base	ed biotechnology products in the EU?
ta and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	ent of Al-base	ed biotechnology products in the EU?
ta and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	ent of Al-base	ed biotechnology products in the EU?
ta and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	ent of Al-base	ed biotechnology products in the EU?
a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	ent of Al-base	ed biotechnology products in the EU?
a and AI in the field of biotechnology and biomanufacturing (e.g. on data, or use of high-performance computers (HPC), etc.)?	ent of Al-base	ed biotechnology products in the EU?
use of high-performance computers (HPC), etc.)?	ent of Al-base 600 character(s) m	ed biotechnology products in the EU?
	ent of Al-base 600 character(s) m	ed biotechnology products in the EU?  naximum  ew, what other actions should be prioritised at EU level related to compare the
600 character(s) maximum	ent of Al-base 600 character(s) m	ed biotechnology products in the EU?  naximum  ew, what other actions should be prioritised at EU level related to compare the
	211. In your view a and Al in the	ed biotechnology products in the EU?  naximum  ew, what other actions should be prioritised at EU level related to one field of biotechnology and biomanufacturing (e.g. on data, on
	211. In your view a and Al in the use of high-per	ew, what other actions should be prioritised at EU level related to the field of biotechnology and biomanufacturing (e.g. on data, on formance computers (HPC), etc.)?
	211. In your view a and Al in the use of high-per	ew, what other actions should be prioritised at EU level related to the field of biotechnology and biomanufacturing (e.g. on data, on formance computers (HPC), etc.)?
	211. In your view a and Al in the use of high-per	ew, what other actions should be prioritised at EU level related to the field of biotechnology and biomanufacturing (e.g. on data, on formance computers (HPC), etc.)?
	211. In your viola and Al in thuse of high-per	ew, what other actions should be prioritised at EU level related to be field of biotechnology and biomanufacturing (e.g. on data, or formance computers (HPC), etc.)?

**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	0	0	0
* Support validation and certification of AI tools in the biotech field	0	0	0
* Secure and high-performance processing of health data made available through the EHDS for development of innovative products and tools for the biotech sector	0	0	0
* Provide access and/or facilitate the use of high-quality datasets through 'data labs'	0	0	0
* Other	0	0	0

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

61	haracter(s) maximum	

**Q13.** To what extent do you agree that the following types of support would help biotech companies, particularly SMEs, **develop and deploy Al 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	0		0	0	0	
* Access to annotated datasets (e. g. biological, clinical, genomic data)	0	0	0	0	0	0
* Access to synthetic datasets	0	0	0	0	0	0
* Regulatory sandboxes for testing biotech-related AI models	0	0	0	0	0	0
* Partnerships with public research institutions or AI hubs /factories	0	0	0	0	0	0
* Simplified IP and data-sharing frameworks	0	0	0	0	0	0
* Skills development and AI training for biotech personnel	0	0	0	0	0	0
* Roadmaps for implementation and scalability of AI tools in the EU ecosystem	0	0	0	0	0	0
* Other	0	0	0	0	0	0
<b>3a.</b> Please indicate other fa	actors her	e.				
4. If you would like to subst the ways forward to suppotechnology, you can do so to character(s) maximum	port the	-				

## **Section 8 - Defence and security**

Advanced biotechnological possibilities including development of synthetic pathogens, aided by Al-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	0	0	0	0	0	0
* Risks to strategic autonomy in biomanufacturing, and availability of medical and non-medical countermeasures	0	0	0	0	0	0
* Vulnerabilities in the resilience of biotech supply chains	0	0	0	0	0	0
* Insufficient civil military cooperation in biotechnology sector	0	0	0	0	0	0
Cybersecurity risks to biotech infrastructure and AI tools used in biotechnology	0	0	0	0	0	0
* Other	0	0	0	0	0	0

Q2. Please indicate other challenges impacting biotechnology for defence and							
security in the EU.							
600 character(s) maximum							

# **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	0	0	0	0	0	•
* 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	0	0	0	0	0	•
* Developments of materials with new functions and/or improved characteristic	0	0	0	0	0	0
* Increased food security	0	0	0	0	0	0
* Other	0	0	0	0	0	0

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
Section 9 - Additional information
Is there anything else you would like to add that has not been covered by
this consultation?

The following questions seek to collect views on possible ways forward to support biotechnology

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