NATIONAL OFFICE FOR RESEARCH ETHICS COMMITTEES

Public Consultation on proposal for National Research Ethics Committee application Fees

Financial Year 2025

7 October 2024

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Introduction

1.1 National Office

The remit of the National Office for Research Ethics Committees (hereafter the 'National Office')[1], is to enable and embed a robust, transparent and cohesive research ethics review system that strengthens the national health research infrastructure.

In 2021, under the auspices of the Department of Health, the National Office established National Research Ethics Committees (NRECs) to review the submission of ethics applications and deliver a 'single national ethics opinion' in the following regulated areas of health research:

- clinical trials on medicinal products for human use; assessed by the National Research Ethics Committee for Clinical Trials for Medicinal Products (NREC-CT)
- clinical investigations of medical devices; assessed by the National Research Ethics Committee for Clinical Investigations of Medical Devices and Performance Studies of *In Vitro* Diagnostic Devices (NREC-MD)
- performance studies of *in vitro* diagnostic medical devices; assessed by the NREC-MD

1.2 Review of fees

To ensure the National Office manages the business of the NRECs with efficiency and rigor, and in accordance with legislative obligations, the National Office committed to review its ethics application fee structure on an annual basis. This commitment was set out in the initial '*Public Consultation on Proposal for HPRA and NREC Clinical Trial Fees – Financial Year 2022*'[2].
In line with that commitment, a review of fees has been carried out by the National Office. In the spirit of transparency, this consultation document provides details of the fees intended to be charged for all ethics applications submitted to the respective NRECs for consideration, in 2025.

- The proposed changes to the fees for ethics applications submitted under the Clinical Trials Regulations[3] are summarised out in Appendix I.
- There is no change to the fees for ethics applications submitted under the In Vitro Diagnostic Regulations[4] and Medical Devices Regulations[5] to the NREC-MD.
- There is no change to the fees for ethics applications submitted under the Clinical Trials Directive.
- There is no change to the 'No fee payment' for non-commercial Sponsors.

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[1] National Office for Research Ethics Committees

[2] Public Consultation on Proposal for HPRA and NREC Clinical Trial Fees – Financial Year 2022

[3] REGULATION (EU) No 536/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 April 2014 on clinical trials on medicinal products for human use

[4] REGULATION (EU) 2017/746 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 April 2017 on in vitro diagnostic medical devices

[5] REGULATION (EU) 2017/745 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 April 2017 on medical devices

PLEASE NOTE: All clinical trials authorised under the Clinical Trials Directive 2004 must have either ended or transitioned to the Clinical Trial Regulations by 30 January 2025. The National Office cannot accept any documentation related to clinical trials approved under the Directive that have not ended or transitioned after this date.

1.3 Public consultation process

The public consultation on fees for 2021 was a jointly coordinated initiative between the national competent authority, the Health Products Regulatory Authority (HPRA) and the National Office and focused solely on the fees for applications submitted under the Clinical Trials Regulations[6].

In 2022, the National Office underwent a public consultation independent of the HPRA to better align with fee payment structures for ethics assessments with European counterparts and to better reflect the contributions made by the NRECs in the assessment of regulated research studies.

In 2023, there was no public consultation process as there were no increases to the application fee structure.

The public consultation for 2024 is seeking feedback on one additional proposed new fee for applications submitted under the CTR. This fee reflects the additional complexity to the ethics assessment process for the NREC-CTs, brought about by staggered submissions of Part I and Part II applications under the CTR. It is proposed that all other application fees under for ethics assessment the CTR remain unchanged for 2025.

Proposed changes to the fees for applications to the Health Products Regulatory Authority (HPRA) for 2025, can be viewed on the HPRA website.

The National Office invites stakeholders to share their views with us on the proposal below.

Contributions to the consultation on these proposals should be submitted to the National Office by 25th October 2024. Contributions should be sent by email to nationaloffice@nrec.ie with subject “Fees consultation”.

1.4 Application & fee process in Ireland

1.4.1 Applications under the MDR and IVDR

Applications that fall under the MDR and IVDR require a separate review by the HPRA and by the NREC-MD.

To apply, Sponsors must pay the relevant fee in advance of submission to the NREC-MD. The process of payment is facilitated through advanced invoice and is outlined in detail on our website: https://www.nrecoffice.ie/apply-2/fees/

[6] REGULATION (EU) No 536/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 April 2014 on clinical trials on medicinal products for human use

1.4.2 Applications under the CTR

Sponsors conducting a clinical trial in Ireland under the CTR, must apply for approvals by submitting the relevant application dossier via the single EU portal, Clinical Trials Information System (CTIS).

There are two elements to the assessment process that inform the application fee structure:

	Dossier	Assessed by
Part I	eg Protocol, investigator's brochure, investigational medical product dossier, etc	HPRA and NRECs - joint National assessment
Part II	eg participant information leaflets, consent documents, suitability of the investigator and clinical sites, etc	NRECs - ethics assessment

A fee is charged by Ireland, where the fee is paid to and processed by the HPRA and on behalf of the National Office in accordance with our financial procedures.

The Sponsor will pay the fee to the HPRA at the time of submitting the initial (ie new studies) clinical trial dossier (Part I and Part II together, Part I only, subsequent Part II) to the CTIS. Following validation, the HPRA will transfer the corresponding fee portion to the National Office.

Similarly for substantial modifications to Part I and II, Part I only, or Part II only documents, the fee will be paid to HPRA, and the relevant portion transferred to the National Office accordance with our financial procedures.

No refund will be permitted once the application is validated.

The process of payment outlined in detail on the HPRA website:
http://www.hpra.ie/homepage/medicines/regulatory-information/medicines-fees

1.4.3 NEW FEE: Separate and staggered submissions under the CTR

For initial applications (ie new clinical trials), the Part I dossier can be submitted alone, and the Part II dossier submitted up to two years later. In this scenario of a separate and staggered submission, the following procedures will apply:

- The full fee will be charged on submission of Part I and Part II dossiers.
- An additional fee will be charged for the submission of initial Part II dossiers when submitted at a later date to the initial Part I submission (a staggered submission).
- If a Sponsor decides subsequently that a trial will not commence in Ireland, and no Part II is submitted, no refund will be permitted.

1.5 Complexities for the NREC-CTs and National Office under the CTR

The growing complexities of the separation of Part I and Part II submissions has created numerous challenges at a national and wider European Member State level. The separate and staggered submission of the two dossiers creates additional administrative challenges for the

National Office, and increased complexity in the ethics assessment of clinical trial applications for the NREC-CTs.
Separate and staggered submissions:

- requires a comprehensive and harmonised assessment, for the Part I when first submitted
- require another ethics assessment again for the subsequent Part II submission. This is due to overlapping elements of the same trial being assessed at two different points in time, and
- may not be assessed by the same NREC-CT

In addition, technical limitations associated with CTIS has meant that Member States, and in particular ethics committees, may have to implement additional complex system workarounds to manage the administration and assessment of staggered Part I and Part II submissions in 2025.

To ensure the most comprehensive and streamlined ethics assessment, the National Office, strongly encourages Sponsors to strive for a Part I ***and*** Part II submission. It is acknowledged that on occasion this is not always possible for Sponsors. However, Sponsors should be aware of the additional challenges and workload that is created when Part I and Part II dossier submissions are separated, and the impact this has on the national ethics assessment process.

The proposed new fee payment for initial Part II only submissions reflects the additional workload across the NREC system to manage staggered submissions.

1.6 Proposed fees under the CTR

Please see Table 1 and Table 2 for the fee structures proposed by the National Office and nationally (including the HPRA fees)

New Clinical Trials on Investigational Medicinal Products for human use

Commercial studies[7]: It is proposed that an additional fee of €1,500 is implemented for initial /new clinical trial Part II only submissions. This is to reflect the additional administrative and assessment burden placed on the National Office and NREC-CTs in the submission of staggered initial clinical trial application dossiers.

Non-commercial studies[8]: No change, no fee applied.

Substantial Modifications of Clinical Trials on Investigational Medicinal Products for human use

Commercial studies: No change

NOTE: In the event of proposed European-wide procedural changes made to accommodate separate and staggered submissions of Part I and Part II dossiers through CTIS in 2025, and

[7] Where the study is industry funded or sponsored, commercial fees apply

[8] Where the sponsor is academic/ not-for-profit funded, non-commercial fees apply

where such procedural changes will impact the nature and extent of the Substantial Modification administration and ethics assessment, the above proposed fee (€1500) will apply**.**

Non-commercial studies: No change, no fee applied.

Appeal of NREC-CT opinion

Commercial studies: There are no proposed fee changes.

Non-commercial studies: There are no proposed fee changes.

1.7 Contact details

The National Office welcomes comments on these proposals and invites respondents to comment.

Contributions to the consultation on these proposals may be provided to the National Office by Friday 25th October 2024. Contributions should be sent by email to nationaloffice@nrec.ie with subject “Fees consultation”.

Appendix I. Proposed National fees for Clinical Trials under the CTR

Table 1. Proposed NREC-CT fees

New Clinical Trials on Investigational Medicinal Products (IMP)	Current fees	Proposed fee change	Percentage increase	Justification
Reporting Member State (RMS) *(Part I & II, Part I only)*	€2,000	-	none	N/A
Member State Concerned (MSC) (Part I & II, Part I only)	€1,500	-	none	N/A
Mono national *(Part I & II, Part I only)*	€1,500			
RMS, or MSC or mono-national *Initial Part II only*	-	€1,500	new	Proposed new fee payment to reflect complexity of administration and NREC-CT assessment of staggered submissions of Part I and Part II dossiers
Supplement – where Ireland subsequently becomes the Reporting member state for Mono national trial	€500	-	none	N/A
RMS -2nd & subsequent waves	€500	-	none	N/A
Non-commercial	€0	-	none	N/A

Table 2. Proposed NREC-CT fees combined with the HPRA fees

New Clinical Trials on Investigational Medicinal Products (IMP)	Proposed HPRA Fees		Proposed NREC Fees		Total Fees	
	CT with IMPD*	CT / no IMPD / with simplified IMPD / low intervention trial	CT with IMPD	CT / no IMPD / with simplified IMPD / low intervention trial	CT with IMPD	CT / no IMPD / with simplified IMPD / low intervention trial
Reporting Member State (RMS) *(Part I & II, Part I only)*	€7,035	€5,775	€2,000	€2,000	€9,035	€7,775
Member State Concerned (MSC) (Part I & II, Part I only)	€1,955	€730	€1,500	€1,500	€3,455	€2,230
Mono national *(Part I & II, Part I only)*	€2,210	€1,040	€1,500	€1,500	€3,710	€2,540
Initial Part II only	-	-	€1500	€1500	€1500	€1500
Supplement - where Ireland subsequently becomes the RMS for mono national trial *(Part I & II, Part I only)*	€5,020	€4,825	€500	€500	€5,520	€5,325
RMS - 2nd & subsequent waves *(Part I & II, Part I only)*	€525	€525	€500	€500	€1,025	€1,025
Non-commercial	€0	€0	€0	€0	€0	€0

* IMPD - Investigational Medicinal Product Dossier