

# Transparency Tested: Conflict of Interest in EU HTA

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## OBJECTIVES

- The Health Technology Assessment Coordination Group (HTACG), established under the new European Union (EU) HTA Regulation, coordinates joint health technology assessments across Member States (MS).
- Subgroups (SG) of the HTACG include:
  - SG on Joint Clinical Assessments (JCA)
  - SG on Joint Scientific Consultations (JSC)
  - SG on Development of Methodological and Procedural Guidance (DMPG)
  - SG on the Identification of Emerging Health Technologies (EHT).
- The representatives of the HTACG and its SGs are responsible for conducting the tasks within them. All representatives must comply with transparency and conflict of interest (COI) rules under Regulation (EU) 2021/2282<sup>1</sup> and Regulation (EU) 2024/2745<sup>2</sup>.
- COI declarations of all representatives of the CG and its SGs have been made publicly available on the European Commission (EC) website<sup>3</sup>, declarations on nine yes/no questions relating to involvement with health technology developers (HTDs) and clinical trials (Figure 1), plus one question for any other declarations, are recorded in each form.
- This study examined the COI declarations, to assess the current level of transparency and representative characteristics under the new EU HTA process.

## METHODS

- COI forms from representatives of the HTACG and all its SGs were downloaded\* from the EC website.
- OpenAI's Generative Pre-trained Transformer (GPT)-4.1 and GPT-5 were used to parse, using Optical Character Recognition, and extract conflicts and structured data. Human-in-loop quality control (QC) was maintained throughout GPT processing, to check for hallucinations of data or incomplete extractions; a moderate level of error was found from GPT-5 extractions, which the human QC amended.
- The data was then transferred into an Excel database, where the results were synthesised.
- For the HTACG and all SGs, the prevalence and nature of declared conflicts was identified and the characteristics of representatives collected (country, organisation, other SG memberships).

## RESULTS

- At the time of the analysis\*, there was a high level of overlapping membership across the CG and its SGs; for example, representatives in the JCA SG were also members of one (26%), two (14%), three (6%) and four (4%) other SGs (Figure 3).
- When accounting for overlapping memberships, the total number of individuals across all SGs in the analysis\* was counted to be 374. The number of representatives in each SG were greatest in the JCA SG (196), followed by the CG (130), JSC (102), DMPG (91), and EHT (79) (Figure 2).
- Across nine yes/no questions and relative to the total number of potential conflicts, overall (after accounting for overlaps) and in each SG (with overlaps), the greatest number of conflicts declared were in the JCA (27 declared; 1.6%) and JSC (14 declared; 1.6%) SGs, and the lowest number of declarations were in the EHT SG (4 declared; 0.6%) (Figure 4).

Figure 3. SG membership, JCA SG



Figure 4. Declarations (N, % of total)

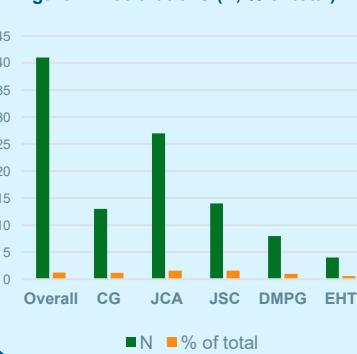


Figure 5. Proportional MS representation, JCA SG



## CONCLUSIONS

- This study reveals 41 declared conflicts across 374 individual representatives in the CG and its SGs (1.2% of total potential COIs)\*, and a concentration of representation from France and Germany.
- The high degree of membership overlap across HTA groups highlights the interconnected nature of EU HTA governance, reinforcing the need for strong transparency and COI management to maintain trust in joint assessments.
- Future research could investigate COI within the wider EU HTA stakeholder network and reassess overall COI as SG representation continues to be updated in this evolving space.

\*COI forms were downloaded for the JCA SG on 25 June 2025 and all other SGs on 3 October 2025. Therefore, the data presented in this poster reflects the state of the declarations as per SG memberships at those time periods.

**Abbreviations:** CG: Coordination Group; COI: Conflict of Interest; DMPG: Development of Methodological and Procedural Guidance; EC: European Commission; EHT: Emerging Health Technologies; EU: European Union; HTA: Health Technology Assessment; HTACG: Health Technology Assessment Coordination Group; HTD: Health Technology Developer; JCA: Joint Clinical Assessment; JSC: Joint Scientific Consultation; MS: Member States; N: Number; QC: Quality Control; SG: Subgroup.

**References:** 1. Directorate-General for Health and Food Safety. Regulation (EU) 2021/2282 of the European Parliament and of the Council of 15 December 2021 (Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R2282>) [Accessed 03/10/2025]; 2. Directorate-General for Health and Food Safety. Regulation (EU) Implementing Regulation (EU) 2024/2745 on conflict-of-interest rules under the EU Health Technology Assessment Regulation of 25 October 2024 (Available at: <https://eur-lex.europa.eu/legal-impl/2024/2745/o>) [Accessed 03/10/2025]; 3. European Commission. HTA Declarations of Interests (Available at: [https://ec.europa.eu/health-technology-assessment\\_en/declarations-of-interests/screen/home](https://ec.europa.eu/health-technology-assessment_en/declarations-of-interests/screen/home)) [Accessed 25/06/2025 for JCA SG and 03/10/2025 for all other SGs].

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