SoHO Coordination Board (SCB)

List of the existing substances, products or activities (S / P / A) (to date) for which an opinion on the regulatory status under the Regulation (EU) 2024/1938 is not available but is needed to avoid risks to the safety of SoHO donors, recipients or offspring from medically assisted reproduction, or risks of a compromised access of recipients to safe and effective treatments.

As required by Article 69(1)(b) of Regulation (EU) 2024/1938, the SoHO Coordination Board (SCB) has drafted "a list of the existing substances, products or activities for which an opinion on the regulatory status under this Regulation is not available but is needed to avoid risks to the safety of SoHO donors, recipients or offspring from medically assisted reproduction, or risks of a compromised access of recipients to safe and effective treatments, making it publicly available on the EU SoHO Platform, and subsequently updating that list at its discretion."

To draft the current list, the SCB used input of a the 'Survey for Competent Authorities: Identification of needs for further legal clarity related with the classification of substances, products, or activities' which was circulated to all Member States in Q3 of 2025. The analysis of this input followed a structured approach, and the decision to exclude certain substances, products, or activities (S/P/A) from the list was made in the following cases:

- There is an existing SoHO monograph in the EDQM guidelines for blood components or tissues and cells (Rationale for using EDQM SoHO Monographs – **Annex I**);
- A Q&A from the Regulatory Questions Working Group that provides clarification has been adopted by the SCB;
- The S/P/A is covered by or merged with another S/P/A that is included on the list;
- The description of the S/P/A provided was too vague to interpret (Note: These S/P/A may be revisited and potentially included in the list at a future date if more information becomes available).

In case products are included on the list, a clarification is given and where applicable and possible, the specific point in the Regulation (EU) 2024/1938 that raises the doubt is also noted. In the clarification, it is also suggested when the S/P/A may be addressed in any of the reflection papers currently being drafted or foreseen to be drafted by the Regulatory Questions WG.

It is important to note that this list is dynamic and aims to serve as a starting point for further discussions of the SCB and its Working Groups regarding the S/P/A contained within. It will be updated in due course, when and where additional information becomes available.

ID	S-P-A	Clarification needed
1	**S/P:** Platelet-Rich Plasma (PrP), Platelet-rich Fibrin (PrF) and Leukocyte- and Platelet-Rich Plasma (L-PrF)	Regarding these SoHO preparations, there is unclarity regarding the distinction between processing and preparatory handling within the same surgical field. This will be assessed by the reflection paper on 'same surgical procedure', however, depending on the exact nature of the specific processes involved, an opinion may be required under Article 69 (1)(c). (Recitals 15 & 30 SoHO Regulation)
2	**S/P:** PrP combined with adipose derived stem/stromal cells	Regarding these SoHO preparations there is unclarity regarding the distinction between processing and preparatory handling within the same surgical field and regarding the use for the same essential function. This will be assessed by the relevant reflection papers, however, depending on the exact nature of the specific processes involved, an opinion may be required under Article 69 (1)(c). (Recitals 15 & 30 SoHO Regulation)
3	**S/P:** Lyophilised PrP	There is unclarity as to whether the preparation method involves large scale pooling or any industrial process. Limited scale pooling falls within the scope of the SoHO framework and is addressed in a relevant reflection paper, an opinion may be required under Article 69 (1)(c).
4	**S/P:** Lymphocyte preparations for immunotherapy	There is unclarity regarding the degree of manipulation associated with this S/P and further consideration is required, an opinion may be required under Article 69 (1)(c).
5	**S/P:** Autologous conditioned serum (incl. interleukin rich serum)	There is unclarity regarding distinction between processing and preparatory handling within the same surgical field. This will be assessed by the reflection paper on 'same surgical procedure', however, depending on the exact nature of the specific processes involved, an opinion may be required under Article 69 (1)(c). (Recitals 15 & 30 SoHO Regulation)
6	**S/P:** Secretomes (incl. exosomes) and Mitochondria	Unclarity regarding distinction between SoHO and Medicinal Product due to the lack of details on how the therapy/substance is prepared.

ID	S-P-A	Clarification needed
7	**S/P:** HSCs, MSCs and other stem cells or tissue preparations that harbor stem cells used for regenerative purposes	A clear description is missing, but a necessity has been identified to clarify the applicability of the SoHO legal framework of hematogenic but also other types of stem cells for regenerative purposes. An opinion may be required under Article 69 (1)(c).
8	**S/P:** Fat derived preparations e.g. Stromal vascular fraction (SVF)	Opinion required, because of unclarity already described in the draft 6th edition of the T&C guide (Chapter 29.1): "*Adipose tissue can be used not only as a structural support, but it may also be a source of SVF or stem cells that can be cryopreserved before or after their isolation . Cells can be used to improve adipose tissue grafting, as in cell-assisted lipotransfer, or for the immunomodulatory property of SVF, which is currently under extensive investigation for its possible use in treating sclerosis and autoimmune, inflammatory and neurologic conditions, taking into consideration that in EU countries, it may fall under the scope of ATMPs*". An opinion may be required under Article 69 (1)(c).
9	**S/P:** Hair transplants for autologous use (Follicular Unit Extraction (FUE) Follicular Unit Transplantation (FUT))	Unclarity regarding same surgical procedure and the extent of processing involved.
10	**A:** Enzymatic Digestion of Tissues	Unclarity when the process concerns minimal manipulation Question of 'minimal manipulation' should be also addressed in future reflection paper, an opinion may be required under Article 69 (1)(c).

Annex I: Background for rationale on using EDQM monographs for the definition of a list of the existing substances, products or activities (S / P / A) for which an opinion on the regulatory status under the Regulation (EU) 2024/1938 is not available but is needed to avoid risks to the safety of SoHO donors, recipients or offspring from medically assisted reproduction, or risks of a compromised access of recipients to safe and effective treatments.

The proposed rationale considers the outcomes of the survey on "Identification of needs for further legal clarity related with the classification of *S/P A*", which have been discussed with the Regulatory Questions WG members and Members of the SCB, and which has exposed uncertainties in some Members States, regarding S/P/As which are included in the scope and definitions of the SoHO regulation. The aim of this rationale is to assist with providing regulatory certainty to these Member States regarding such S/P/As.

The SCB will be involved in the drafting process of future EDQM-monographs. This will also enable the possibility to start any consultation procedure of advisory bodies under other legal frameworks as outlined in art. 13(3).

Rationale:

Having initially taken into account the **scope** and **definitions** outlined by the SoHO Regulation, the Regulatory Questions WG has agreed that the **SoHO Preparations**[1] **and associated clinical indications, as detailed in the EDQM SoHO monographs**[2] in principle **fall under the classification of a SoHO and therefore within the scope of the SoHO Regulation**. Hence, these SoHO preparations and therapies shall not be subject to further assessment by Regulatory Questions WG foreseen under the Article 69 (1(a) and (c)), as the monographs are part of the technical guidelines developed by the EDQM on the basis of scientific knowledge, include an evaluation of up-to-date scientific evidence and have been defined as **consolidated SoHO preparations and therapies for the consolidated uses of SoHO defined therein, by experts in the field and reflects the practices of SoHO Entities across different Member States across different Member States, and for which established rules are in place to ensure their quality and safety**. Furthermore, processing[3] (i.e. the technical procedures) and specifications associated

[1] 'SoHO preparation' means a type of SoHO that: (a) has been subjected to processing and, where relevant, one or more other SoHO activities (…) (b) has a specific clinical indication; and (c) is intended for human application to a SoHO recipient or is intended for distribution – Regulation (EU) 2024/1938

[2] 'EDQM SoHO monograph' means a specification of the critical quality parameters of a particular SoHO preparation defined by the European Directorate for the Quality of Medicines & HealthCare of the Council of Europe (EDQM) – Regulation (EU) 2024/1938

[3] 'processing' means any operation involved in the handling of SoHO, including, but not limited to, washing, shaping, separation, decontamination, sterilisation, preservation and packaging, except for the preparatory handling of SoHO for immediate human application during a surgical intervention, without the SoHO being removed from the surgical field before they are applied – Regulation (EU) 2024/1938

with the preparation and the clinical use of each preparation as defined in the monographs (such as, for example, the need for and scale of pooled donations or specific clinical indications), should not be interpreted differently based on legislation defined for other frameworks.

By reference to these monographs, both SoHO establishments and Competent Authorities shall understand that certain S/ P/A that do not have a matching monograph may:

A) Need to be assessed for novelty, and subsequent application of the risk assessments in order to be authorised as a SoHO preparation under the SoHO Regulation for the intended preparation and clinical indication or;
B) Need more attention to determine their classification and authorisation. However**,** the absence of an S/P/A in the EDQM Monographs does not imply that the S/P/A cannot be classified as SoHO. Its classification under SoHO or another framework (such as Medicinal Products or Medical Devices) requires additional assessments, as stipulated by various legal frameworks.

Given the dynamic nature of the field of SoHO, constant evolution of preparations and therapies is expected. Therefore, it is recommended that SoHO Competent Authorities at the national level consult the updated list of monographs published by the EDQM in their own deliberations before requesting the opinion of the SCB regarding the regulatory status of an S/P/A.

At the time of publishing the technical procedures and specifications associated with the preparation and the clinical use of each preparation as defined in the monographs:

- 22nd Edition of the 'Blood Guide' - Guide to the preparation, use and quality assurance of blood components, EDQM, 2025
- 5th Edition of the 'Tissues and Cells Guide' – Guide to the quality and safety of tissues and cells for human application, EDQM, 2022

Date of Issue: [16.03.2026].

Version Number: [1.0] adopted by the SoHO Coordination Board].