

## SoHO Coordination Board (SCB)

### Methodology for classification of

# Critical SoHO

and

# Critical SoHO Entities

#### **Introduction:**

The methodologies proposed in this document were established by the Members of the Supply Working Group (WG) of the SoHO Coordination Board (SCB). They are based on the inputs received from WG and SCB members, and the findings from the "*Survey Classification of 'Critical Substances of Human Origin (SoHO)' and 'Critical SoHO Entities': Survey for Competent Authorities*," conducted by the SoHO Team at the end of 2024.

#### **Aim:**

The objective of these methodologies is to establish indicative criteria for classifying 'critical SoHO'<sup>1</sup> and 'critical SoHO entities'<sup>2</sup> as defined in Article 69(1)(f) of the Regulation 2024/1938. This aims to promote a harmonized and consistent approach among different Member States for classification procedures.

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<sup>1</sup> 'critical SoHO' means a SoHO for which an insufficient supply will result in serious harm or risk of serious harm to recipients' health or in a serious interruption in the manufacture of products regulated by other Union legislation, as referred to in Article 2(6), where an insufficient supply of such products will result in serious harm or risk of serious harm to human health;

<sup>2</sup> 'critical SoHO entity' means a SoHO entity that carries out activities contributing to the supply of critical SoHO and the scale of those activities is such that a failure to carry them out cannot be compensated by activities of other SoHO entities or alternative substances or products for recipients

The proposed methods for classification of SoHO and entities should be considered separately:

1. The evaluation of **critical SoHO** is meant to be carried out by the Member States<sup>3</sup>. This assessment should consider factors such as the interest of the SoHO in specific indications(s) and the ability to access therapeutic alternatives (including affordability) in these indications, the organization of SoHO donation systems at the national level, and the specific needs of the population. The outcomes of these assessments will be published on the SoHO Platform and used to evaluate the critical SoHO Entities. Consequently, the lists of critical SoHO may vary among Member States, reflecting socio-economic differences and variations in national SoHO activities and regulatory and ethical principles.
2. The evaluation of activities conducted by SoHO entities is designed to be a self-assessment carried out by the entities themselves, followed by validation or revision by the Competent Authorities responsible for entity registration and authorization. This assessment should be carried out by professionals responsible for the entity's activities, who understand how their actions impact the system at local, regional, national, or EU levels. Validation during registration on the SoHO Platform by Competent Authorities ensures alignment with the strategic planning of the Member States

The proposed methodology should be regarded as a living document, evolving based on the experiences of Member States in classifying SoHO and entities, as well as their capacity to implement emergency plans at both the entity and national levels.

#### **General key considerations:**

- **Flexibility:** SoHO and SoHO entities may assume different classifications due to unique circumstances or experiences in a Member State. The responsibility for defining national lists of critical SoHO ultimately lies with the Member States, and SoHO entities should consider these lists when conducting self-assessments and registering on the platform.
- **Need for Periodic Review:** The criticality of both SoHO and entities should be periodically reviewed to account for changes in national systems, such as the availability of SoHO entities within a country, or the emergence of therapeutic alternatives. Some SoHO classified as critical may eventually have accessible and affordable alternatives. Therefore, Member States will have the opportunity to update the list of critical SoHO on the SoHO platform as necessary. Such updates may necessitate reassessing the criticality of entities, and this process should be coordinated at the member state level using the Registration Module on the SoHO platform or alternatively the national registries according to Article 16 (2) of the

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<sup>3</sup> Member States are responsible for determining, at the national level, the appropriate parties to conduct this assessment, taking into consideration the mandates of their Competent Authorities. These considerations include, but are not limited to, the coordination and monitoring of relevant activities, technical expertise, and involvement in the future planning and coordination of emergency plans. (e.g. Member States may decide to assign the assessment to their Competent Authorities, the Ministry of Health, or a specialized committee composed of diverse experts, such as officers from Competent Authorities, professionals from SoHO establishments, and/or clinicians). The responsibility of keeping the national list of critical SoHO updated and publicly available to stakeholders should rest with the SoHO National Authority. The SNA will also be tasked with transmitting the updated information to the SCB for publication on the SoHO Platform.

Regulation 2024/1938, to register and publish updated criticality information for SoHO entities.

- **Timeframe of Contingencies:** Details regarding definitions and priorities for preparedness for various types of contingencies will be outlined in future emergency plans proposed by the Supply of Critical SoHO WG. The present methodology is designed to consider ‘worst-case scenarios’ where SoHOs become unavailable for periods sufficient to cause serious harm to patients, such as when blood components are unavailable for hours, or haematopoietic stem cells for days, delaying potentially life-saving transplants.

#### **Key Considerations for the Classification of SoHO:**

- **Definition of Serious Harm:** Member States can interpret how to assess whether the absence of a certain SoHO can cause ‘serious harm’ to patients. It is recommended to use the adapted definitions provided in the Common approach for definition of Reportable Serious Adverse Events and Reactions<sup>4</sup> (to be updated by the Supply of Critical SoHO WG and Vigilance and Traceability WG of the SCB) as a reference, which include:
  - Irreversible/persistent or significant disability or incapacity;
  - Inability to perform medical or surgical intervention(s) aimed to prevent permanent damage or impairment of a body function;
  - Other life-threatening conditions;
  - Death of patients.

This also applies to considerations regarding the incidence or volume of patients affected by such an absence. Member States may classify as critical both SoHO affecting a large number of patients (e.g., Blood components for transfusion) and SoHO potentially impacting a small, but significant, number of patients (e.g., Heart Valves for paediatric patients or Haematopoietic Stem Cells).

**Clinical Indications:** The principle of considering the ‘worst-case scenario’ should guide the assessment of critical SoHO, by the Competent authorities, and where necessary experts. Therefore, even though all authorized clinical indications can be tested using the proposed methodology, if (at least) one is deemed critical, the corresponding SoHO must be classified as critical. This indication will enable the adjustment of emergency plan measures to meet the necessary needs within SoHOs for patients with the clinical indication(s).

#### **Key Considerations for the Assessment and Classification of SoHO Entities:**

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<sup>4</sup> [COMMON APPROACH FOR DEFINITION OF REPORTABLE SERIOUS ADVERSE EVENTS AND REACTIONS \(SARE\) AS LAID DOWN IN THE TISSUES AND CELLS DIRECTIVE 2004/23/EC AND COMMISSION DIRECTIVE 2006/86/EC](#)

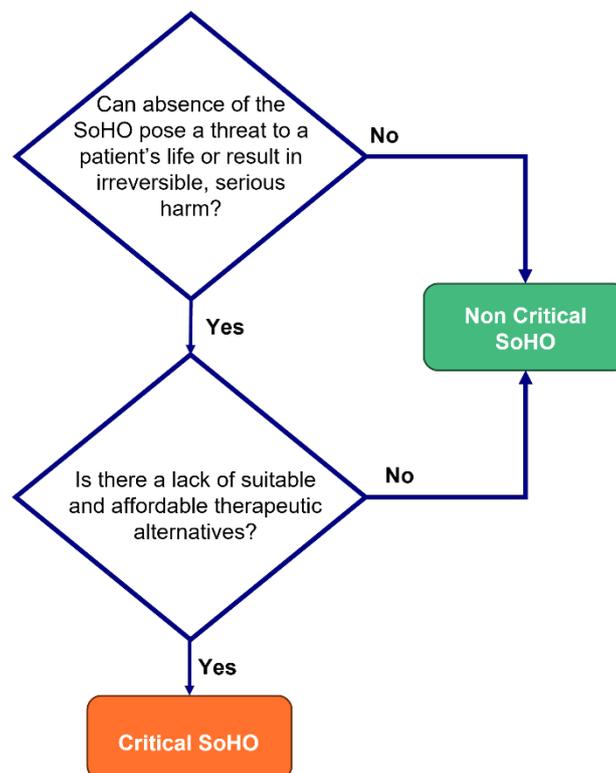
- **Sufficiency and Supply:** While criticality of activities can be assessed from various perspectives, SoHO entities are encouraged to self-assess their activities to reflect their impact on the system in which they operate. Thus, criticality of activities can be evaluated based on the impact of entities' activities for the supply at local, regional, or EU levels, depending on their volume and relevance. Where relevant, when assessing this impact, entities are encouraged to collaborate with authorized establishments responsible for the release of critical SOHO preparations that have a global vision of the chain from collection to application, as well as the needs in the essential indication and the stocks usually observed for a given critical SoHO, and the existence or potential shortages/disruptions in the supply of alternative therapies.
- **Criticality of Activities:** The SoHO platform will enable applicants to designate specific activities as critical (per SoHO category), when not all activities impact the supply of critical SoHO. Consequently, a critical SoHO entity may need to develop emergency plans only for specific activities or SoHO categories. This applies for instance to SoHO entities that handle multiple types of SoHO, where not all SoHO meet the criteria of being critical. Additionally, the platform will include a free text field, allowing applicants to provide further information and rationale for why they consider their entity critical or non-critical, regardless of the self-assessment outcome.

## Criteria for classification of Critical SoHO

The following two criteria must be met\* for a SoHO to be classified as “critical”:

1. Can absence of the SoHO pose a threat to a patient’s life or result in irreversible, serious harm?
  - Yes
  - No
2. Is there a lack of suitable and affordable therapeutic alternatives?
  - Yes
  - No

*\*Note: YES is required for both questions for a SoHO to be classified as critical. If the answer to any or both of the above questions is NO, the SoHO is not critical; in this case, do not proceed with classification of the SoHO entity.*



**Fig. 1** – Schematic representation of the methodology for the classification of critical SoHO

## Criteria for classification of Critical SoHO entities

Criterion 1:

Does the SoHO entity carry out activities contributing to the supply of critical SoHO?

(Considering the outcome of classification of 'Critical SoHO' proposed above)

- YES
- NO

**If No**, the assessment is finalized and the Entity classified as non critical.

**If yes**, please assess Criteria 2 and 3 (as appropriate)

Criterion 2: Volume and significance of SoHO activities<sup>5</sup>

Is the SoHO Entity the only or an essential supplier of Critical SoHO(s) / activities related to any critical SoHOs, indicating a high level of criticality and irreplaceability (i.e. Can the supply of critical SoHO be ensured in absence of this SoHO Entity? How does the SoHO Entity impact the SoHO supply chain?)

- YES
- NO

Criterion 3: Specialised Services, Equipment or Expertise

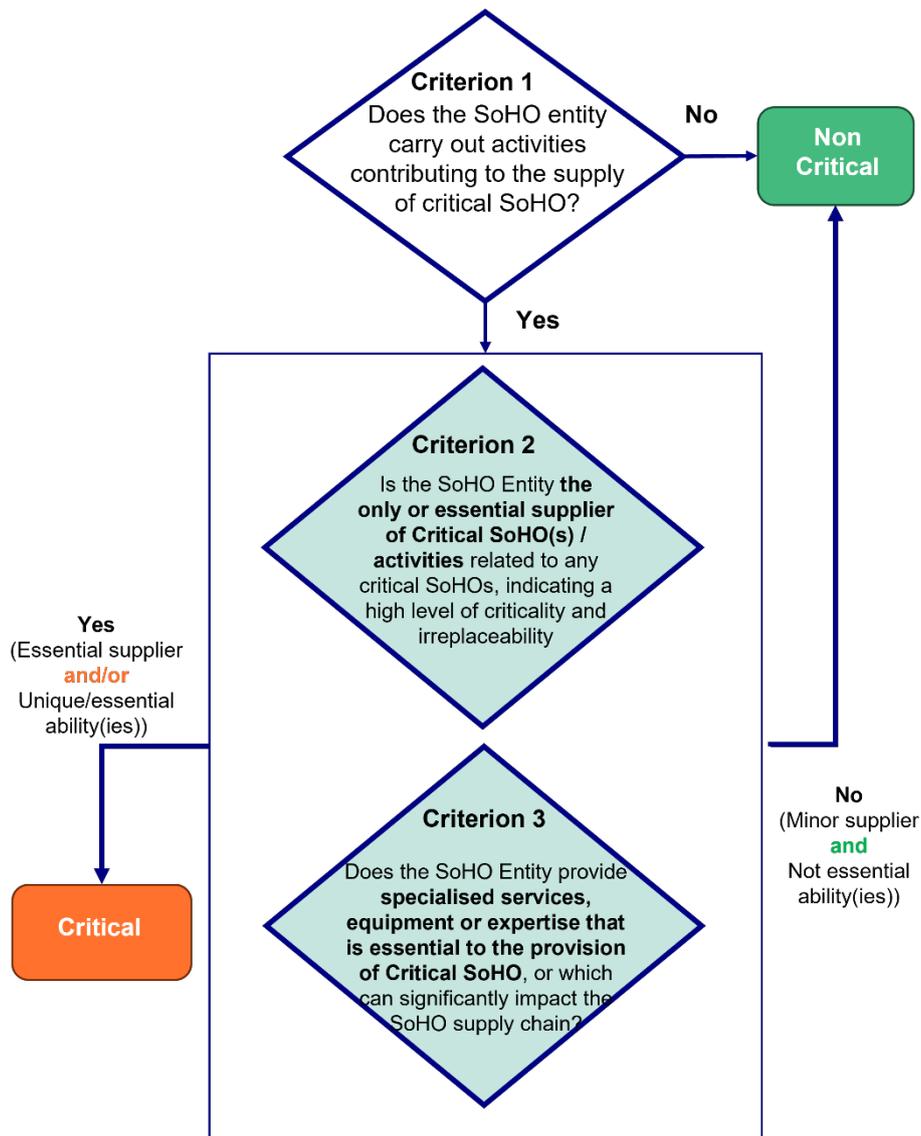
Does the SoHO Entity provide specialised services, equipment or expertise that is essential to the provision of Critical SoHO, or which can significantly impact the SoHO supply chain?

- **YES**,  
the SoHO Entity has a unique/essential ability to provide specialised services, equipment or expertise that is essential to the provision of Critical SoHO (the services, expertise or equipment provided by the entity are not available elsewhere/cannot be replaced or is vulnerable due to accessibility limitations).
- **NO**,  
the SoHO Entity has limited ability/or does not provide specialised services, equipment or expertise that is essential to the provision of Critical SoHO or which can significantly impact the SoHO supply chain. (i.e. the entity is not essential to the provision of specialized services, equipment or expertise, indicating some level of redundancy, and it is not particularly vulnerable in terms of accessibility).

**If yes to criterion 2 and/or 3**, the entity is classified as critical.

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<sup>5</sup> For SoHO Entities (non-SoHO Establishments), the evaluation of these criteria should be conducted in collaboration with the SoHO Establishments to which the SoHO Entity provides services. For example, a donation center should consult with the SoHO Establishment to assess the significance of their contribution to the supply chain.



**Fig. 2–** Schematic representation of the methodology for the classification of critical SoHO Entities