







Welcome by Andy Evans
Chair, MMIP
Site Lead, AZ Macclesfield





Morning Agenda



| 10:00 | Introduction | Steve Thompson ABPI Steve Bates BIA Sue Dunkerton KTN |
|-------|---------------------|--|
| 10:30 | Keynote Speech | Lord Prior of Brampton, Minister, BEIS |
| 10:45 | MMIP Achievements & | Ian McCubbin |
| 11:00 | MMIP Overview | Richard Turner Magda Papadaki Sean Bermingham Clive Badman Alex Felthouse Yvonne Stewart |
| 12:00 | Lunch & Tours | |





Afternoon Agenda

| 14:00 | How manufacturing might be evolving | Ian McCubbin Prof Lionel Clarke Steve Bagshaw Andy Evans Roger Kilburn |
|-------|--|--|
| 14:50 | MMIP's Response to the Industrial Strategy | Andy Evans |
| 15:30 | Break-out Groups | Richard Turner Alex Felthouse Magda Papadaki Mike Sullivan Andy Evan |
| 16:15 | Feedback & Close Out | Andy Evans |
| 17:00 | Drinks Reception | Close out 18:00 |





Introduction by ABPI, BIA, KTN

Mike Thompson, Chief Executive ABPI Steve Bates, Chief Executive BIA Sue Dunkerton, Director KTN







KTN and MMIP
Connecting people to accelerate innovation

Sue Dunkerton OBE

Director

Knowledge Transfer Network







Knowledge Transfer Network (KTN)



- UK's Innovation Network
- Connecting the unusual suspects to accelerate innovation
- Seeking to ensure value is created from every great idea







Industrial Strategy



- Industrial Strategy Challenge Fund workshops
 - 800 leaders in 9 workshops over 1 fortnight
- Leadership Councils
 - Medicines Manufacturing (MMIP)/Advanced Therapies (ATMTF), Industrial Biotechnology (IBLF), Advanced Materials (AMLC), Synthetic Biology (SBLC), Chemistry Growth Partnership (CGP) etc
- Reports and Roadmaps



Advanced Therapies Manufacturing Action Plan

Retaining and attracting advanced therapies manufacture in the UK



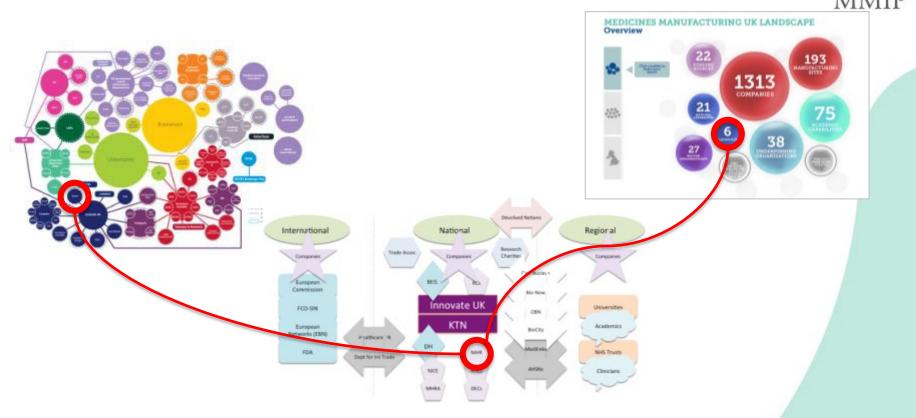






Navigating the landscapes





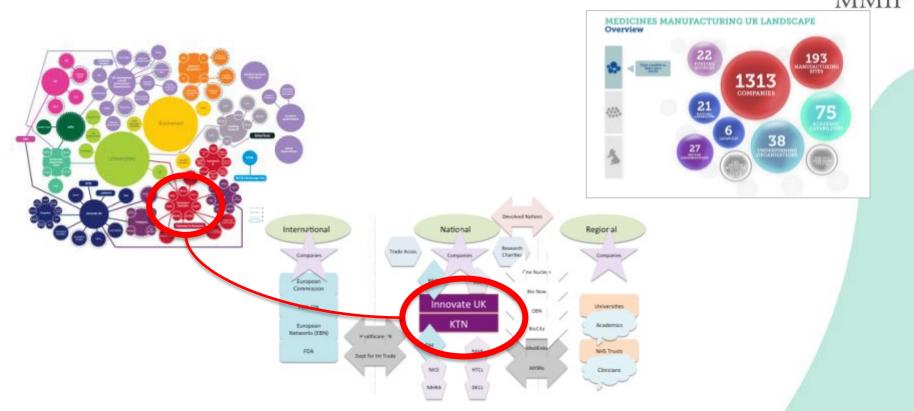






Working with the funders











MMIP

Connecting communities

SYNTHETIC BIOLOGY

IOT

PACKAGING

MEDICINES DISCOVERY UK LANDSCAPE

Overview

556

CONTRACT RESEASCH

CONTRACT RESEASCH

CONTRACT RESEASCH

CONTRACT RESEASCH

AND CONTRAC



DIGITAL MANUFACTURING

ROBOTICS AND AI

FORMULATION

MEDTECH

DIGITAL HEALTH

MATHEMATICS











Progress within MMIP

- Advanced Therapies Manufacturing Taskforce and Action Plan
- Initiated and supported AMSCI ADDOPT AMSCI £20.4M Govt-industry-academia collaboration
- Delivered the Medicines Manufacturing Landscape Portal
- Ran the smart packaging scoping workshop for MMIP using cross KTN expertise
- Championed Technology Clubs such as BRIC for the biologics /bioprocessing community





Smart Packaging for Smart Pharmaceuticals

A report by Martyn Cherrington, Brian McCarthy and Steve Morris April 2016

Bioprocessing Research Industry Club (BRIC)





New areas of relevance



Innovation and Local





Diversity in Innovation



Science and Innovation Audits (SIAs)













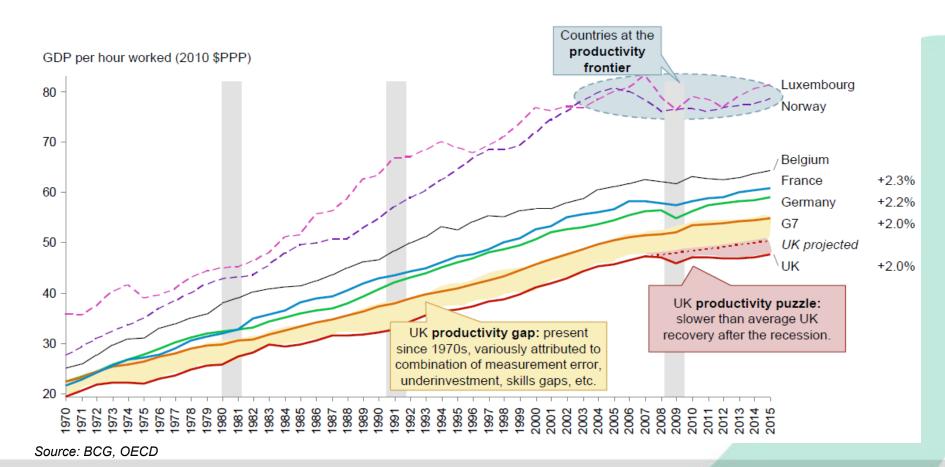
Keynote speech
Lord Prior of Brampton
Minister, Department for Business, Energy
and Industrial Strategy





Challenge 1: the UK has lagging productivity at national level – and needs to transform productivity growth to catch up





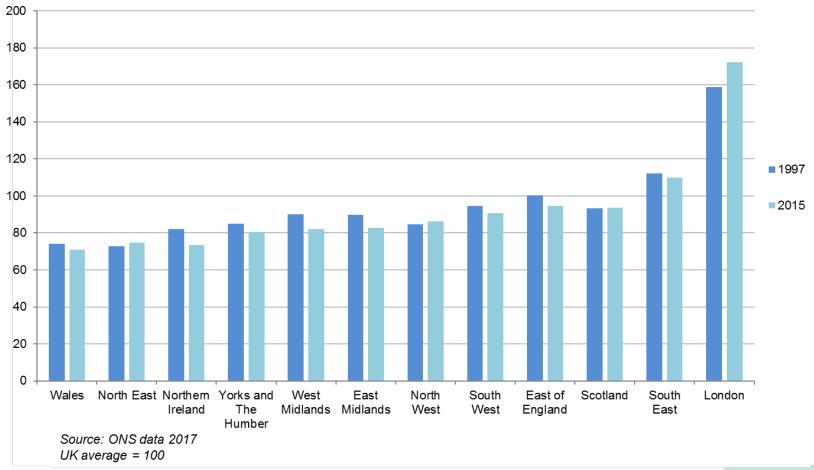




Challenge 2: significant unevenness in productivity in different places and sectors



Productivity by UK Region, 1997 and 2015 NUTS1 GVA per head indices







Response: Our green paper leading to an Industrial Strategy













Science, Research and Innovation

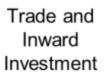
Skills

Infrastructure

Business Formation, Growth and Investment

Procurement







Affordable Energy and Clean Growth



Sectors



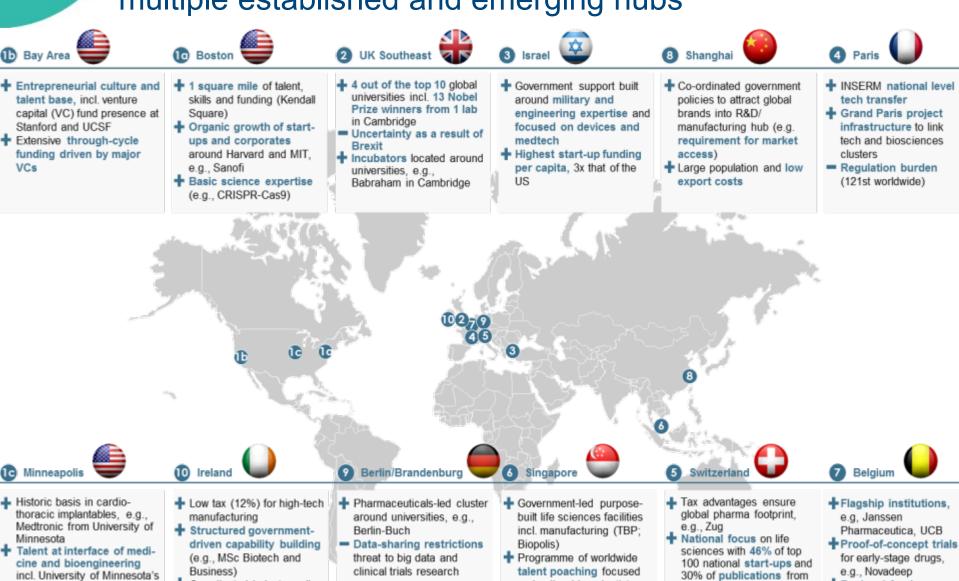
Spreading Growth Across the Country



Sectors and Places: Linking Institutions



Life science investment is globally competitive – multiple established and emerging hubs



on leading bio-scientists

Regional funds, e.g.,

IWT (Flanders), Innoviris

(Brussels), and DGO6

(Wallonia) bridge early

stage growth to

mid-caps

ETH Zurich, Basel and

Strict regulation is

cumbersome for

Geneva

start-ups

 New stricter FDA regulation is disproportionally affecting complex implantables and threatening future growth

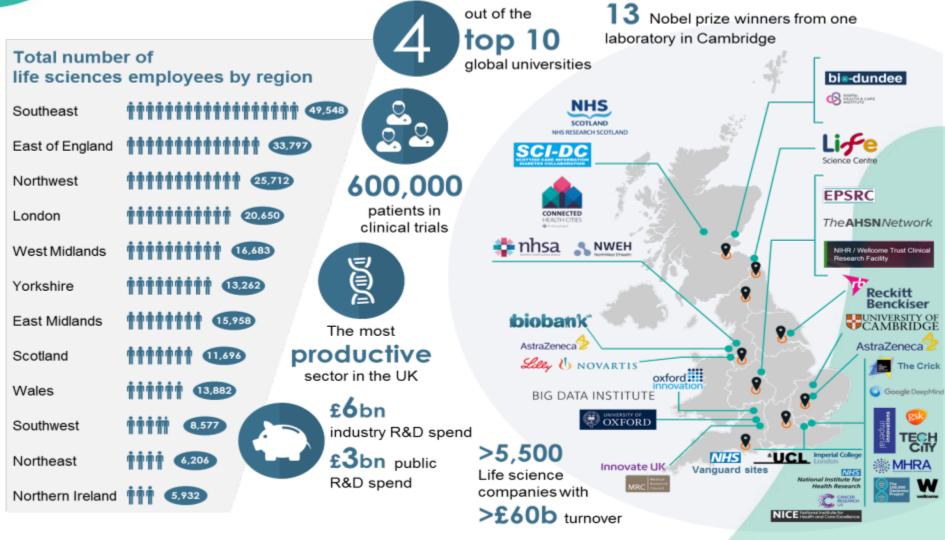
Biomedical Engineering

Coordinated industry policy,

e.g., IDA and Enterprise

Ireland

The UK has world-leading universities and a strong, well-distributed research base



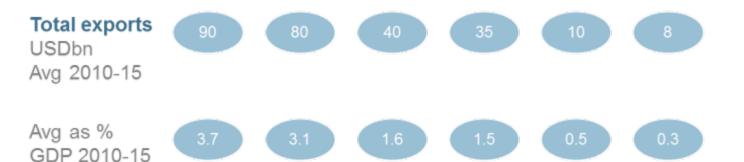


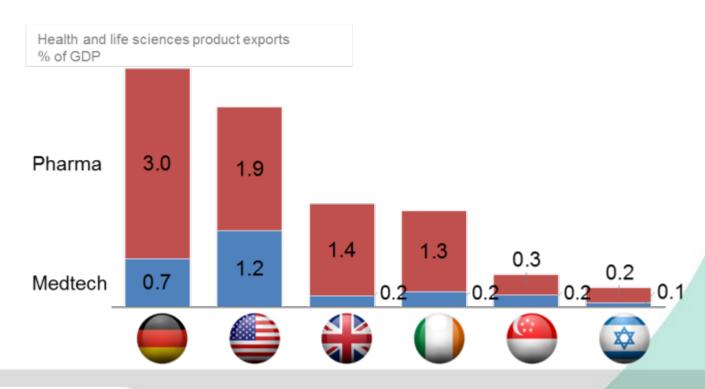




UK life science exports lower than those of Germany and the US – we can do better







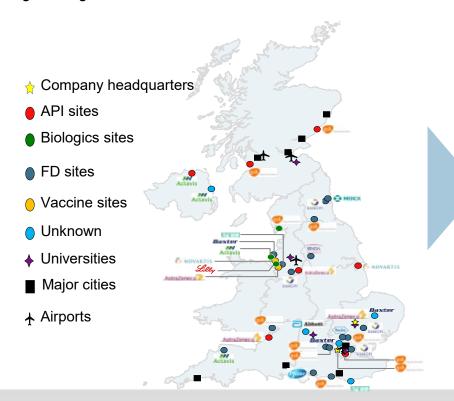


Small molecule manufacturing is an example where the UK capabilities can become world leading



Current UK position

Critical mass of manufacturing in this area as well as strong academic capabilities especially in chemical engineering



Opportunities to become world leaders

scale of manufacture required is reducing and product potency is increasing leading to worldwide gaps in capabilities

- Improved productivity through continuous processing and processing analytical technology offer opportunities
- New modalities (e.g., Antibody Drug Conjugates, oligonucleotides and the potential for synthetic biology toolkits)
- Technology improvement opportunity through use of digital manufacturing, AI and the Internet of Things to develop the next generation of pharma manufacturing and recapture manufacturing that has been offshored







MMIP Overview & Achievements by Ian McCubbin

Senior Vice President for Global Supply and Manufacturing, GSK & Former Chair MMIP





The Tax Environment by Richard Turner



Managing Director, FTI Consulting



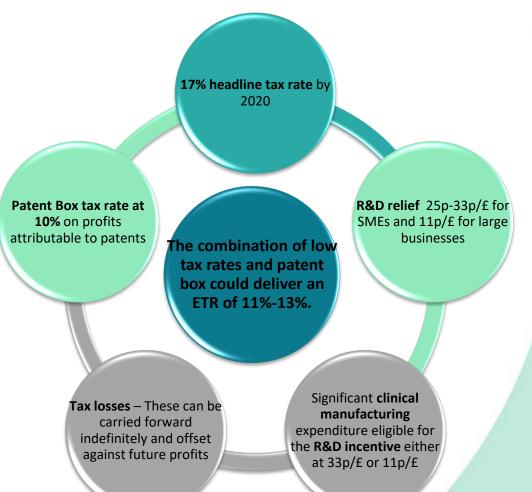


Benefits of the UK for EMEA medicines manufacture



The UK provides a very attractive tax regime for a regional manufacturing.

It combines low rates of tax, innovation incentives (R&D tax relief and Patent Box), other significant tax benefits (below) and one of the most comprehensive global treaty networks.









Technology and Innovation
by Magda Papadaki
Head of Manufacturing Innovation, ABPI

Apologies from Gregor Anderson, feel free to contact him on:

Gregor.jm.anderson@gsk.com







Technology & Innovation 2017

Technology and Innovation

- Identify opportunities for innovations and technologies that will drive UK growth **align with** technology roadmap.
- Selectively deliver Technology **events** to disseminate sector knowledge on disruptive technologies and source ideas.
- Work across MMIP-supported projects to expand the existing UK capability and infrastructure – look beyond MMIP



Main Drivers

- Building on and expanding the UK's strong knowledge, technology and innovation base
- Emerging science and modalities pose new manufacturing and process challenges
- Industry also faced with growing pressures for higher efficiency and patient centric value
- New technology and more effective and agile end-to-end supply chains are essential to achieving this

| Specific Deliverables and Outputs | TARGET |
|--|--------|
| Grow and maintain links across manufacturing ecosystem to promote and enrich project portfolio: Advisory group to include/ link small innovators and bio-cohorts; partnerships with existing groups such Include academia, ISPE, MHRA, Innovate UK, research councils and the Catapults (HVM, Cell & Gene Therapy and in the future Precision medicine and Medicines Discovery, MedTech). Collaborate across sectors | |
| Maintain and promote Technology 2017 roadmaps, through targeted community building actions | |
| Sponsor aligned project proposals (MMIC) and continue to coordinate existing portfolio (ADDoPT, REMEDIES) | |
| Connect to investigate and progress new opportunities such as: ATMP manufacturing, supply digitalization and electronic labelling, advanced analytics, redistributed manufacturing, Collaborate with enabling suppliers | |

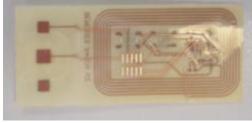


Technology & Innovation 2017





- •Road map Highlighted technology opportunities to be published end Q1 17
- •Electronic Leaflets –Project transferred to REMEDIES Q1 2017
- •Smart Labels Offers increased security/tracking in supply chain trials Q1 17
- NHSE Partnership MMIP supporting two projects (Prof Liz Kay /ABPI)
 - Simplified pack sizes for blister packs
 - Chemotherapy banding technology and standard potential
- •ISPE/MMIP Technology seminar held Feb 17 more sessions planned through 17











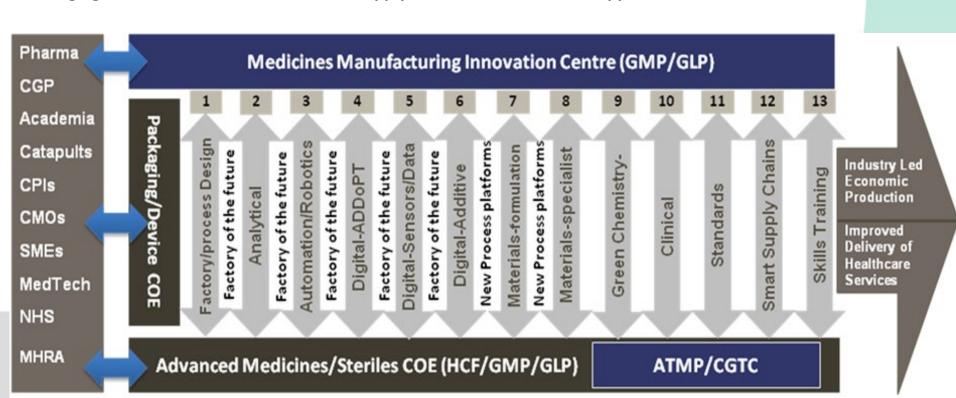






Technology & Innovation road map

- *
- Road map has clear outputs built on a 2 pronged end goal economic growth and enhanced healthcare
- Focus is on GMP clinical manufacturing and enables new medicines supply into the clinic early
- Builds on and complements existing requests (CGTC) and on-going programs (ATMP/MMIC)
- Encourages sharing of core technologies leans and focuses to remove any gaps in journey from bench to clinic
- Sets the UK up as a research and development AND manufacturer for all medicines platforms
- Enhances current capabilities and academia/SMEs/CGP in the UK and future proofs
- Packaging and Device CoE will serve whole supply chain and future device opportunities





From molecule to drug product to patient: increasing R&D efficiency, reliability of supply chains and robustness of drug product performance

Dr Clive Badman
Director, Project Remedies

Dr Sean Bermingham
Director, Project ADDoPT

Macclesfield, 20 March 2017







Outline



ADDoPT project overview



REMEDIES project overview



 Industrial Strategy Challenge Fund considerations







Industrial Strategy Challenge Fund considerations











Medicines Manufacturing Innovation Centre

Accelerating the translation of promising research into commercial adoption in small molecule pharmaceutical manufacturing.

Date: 06-March-2017









MMIC - OVERVIEW



Open access innovation centre dedicated to small molecule pharmaceutical medicines manufacturing

GMP Facility
Primary and Secondary
Manufacturing
Novel Technology
Platforms
Novel Building/Facility
Regulatory Interface
Research Translation
Proof of Concept

OBJECTIVES

Accelerate adoption of emerging & novel manufacturing technologies and transform fine chemical /pharmaceutical manufacturing by:

Creating a physical infrastructure and capability for radical and disruptive innovation in fine chemical/pharmaceutical manufacturing.

De-risking investment in new technologies

Creating a focal point to coordinate and drive fine chemical/pharmaceutical manufacturing innovation.

Providing a support structure for SMEs and start-ups to innovate and grow.

Providing thought leadership to the fine chemical/pharmaceutical innovation community.

INDUSTRY SECTORS SERVED

R&D and Manufacturing: Pharmaceutical Fine Chemical



BENEFITS TO INDUSTRY

Cost savings and income generation via:

Capital efficiencies

Risk reduction

Demonstration of benefits of new technologies and innovation in an external environment

Enabling collaboration
Platform for engaging with
regulators

Increased productivity

Deepening the skills base

CURRENT INDUSTRY ENGAGEMENT & SUPPORT

LARGE COMPANIES

GSK, Pfizer,
AstraZeneca, Johnson
Matthey Bayer, Lilly,
Merck, Patheon, Sanofi,
Siemens, GEA, GE,
Morgan Sindall

SMEs

Shasun, Chemtrix, Nitech, Pharma Solutions, Robinson Bros, Thomas Swan & Co. Ltd. Range of technology companies

FUNDING

The total ask from the Government and Industry is £55.8m over a 5 year period to cover capital spend for physical infrastructure and equipment (£35.2m) and operating costs (£20.6m). Anticipated funding from government includes up to £15m via Scottish Enterprise and £13m via IUK.









CURRENT AREAS OF INTEREST

| # Companies | Area of Interest |
|-------------|--|
| (9) | Showcase emerging technologies |
| (6) | Primary manufacturing processes (synthesis, API, drug substance) |
| (4) | Bring continuous manufacturing into manuf supply chain |
| (4) | Secondary manufacturing processes (formulation, drug product) |
| (2) | Emerging sterile technologies |
| (2) | Develop and explore new analytical, IT, control systems |
| (2) | Supply chain optimisation |
| (1) | Contract development and manufacture using new technologies |



The following is a high level summary of the most common themes indicated by potential MMIC users/collaborators:

- De-risk the introduction of new technologies into current supply chains (clinical and commercial)
- GMP demonstrator of emerging technologies (to ensure data can be used for regulatory filings, potential use of clinical materials)
- Supply chain optimisation

Several companies have indicated a desire to be able to make commercial materials, this will be investigated further for state aid implications.

Several companies have indicated a desire to be able to make clinical materials, this will be investigated further as this is primary driver for MMIC to be a GMP facility.

<u>Note</u>: The scope of MMIC is flexible and has not been fixed. Scope will be determined through industry demand, which will be identified through dialogue with potential contributors and collaborators in MMIC via future workshops and discussions.









Further development and adoption by practitioners of Digital Design tools



 Efficient R&D → capacity to bring more products to the market

In-silico: Primary Manufacturing → Secondary Manufacturing → Bioavailability

Active Ingredient (API)

Crystallisation Milling Blending Compaction Washing Drying Coating

- QbD 2.0 to ensure robust manufacturing using order of magnitude less experimentation
- High TRL activity ('AMSCI' like)









Medicines Manufacturing in the UK 2017

Skills

by Alex Felthouse

General Manager, Eisai Manufacturing Ltd.







Workforce in Numbers...



107,000

Medicines Manufacturing Labour Force*1

New Staff Required by 2025 to Meet Demand*2

32,000.



54%

Technical Level Jobs*2

*1 – Strength and opportunities report 2015 *2 – SIP Skills Strategy 2016





Medicines Manufacturing Skills



Ensure the education system and $\underline{\text{curricula}}$ can meet the demands of our $\underline{\text{MMIP}}$ industry

- Input into the Government's Industrial Strategy.
- Support the Life Science and Industrial Trailblazer Group in the development of new apprenticeship standards.
- Map the current HE offering in relation to industry specific courses and determine gaps.

Ensure suitable <u>facilities</u> are available to develop a skilled workforce in current and emerging technologies

- Deliver on the Advance Therapy Manufacturing Taskforce Report recommendations.
- Establish if there is a roll for Technical Colleges to support manufacturing clusters and local colleges to support businesses.

<u>Attract</u>, retain and develop the Medicines Manufacturing workforce of the future.

- Inspire the young to follow STEM subjects, inform children and teachers of career paths and expose student to the workplace – STEM and SIP Ambassador
- Attract the next generation of technicians and graduates into the industry.
- Support the development of networks or clubs, where national cohorts are small.





The Medicines **Manufacturing Industry** needs to attract 3 new people for every 100 it employs each year from now till 2025!







Medicines Manufacturing in the UK 2017

Regulatory
by Yvonne Stewart
Head of Advocacy,
Global Product Quality, GSK





REGULATORY

- •Connect and promote UK's regulatory environment as a core asset for medicine manufacturing investment.
- •Support the UK's regulatory negotiations for Brexit.
- Provide industry's views and objectives in opportunity areas like ATMPs and innovative manufacturing technologies.



Main Drivers

- Support an effective regulatory environment and optimise UK framework for implementing established licensing and inspection legislation.
- Understand new challenges and shape the future regulatory framework for emerging products and technologies, e.g. ATMPs, digitalized, distributed and continuous processes and supply chains

| chains | |
|---|-----------------|
| Specific Deliverables TBD – Key action pillars: | TARGET |
| Future proof the UK's regulatory environment and enable a long term medicines manufacturing strategy for the UK - Finalize and promote the regulatory optimisation paper - Continue close work with MHRA to understand their priorities for support – e.g. EU/UK transition. | Throughout 2017 |
| Canvass existing and emerging regulatory challenges / opportunities across innovation areas: Support MHRA in delivering the ATMT recommendations and set up technical workshops with industry Liaise closely with the work of the ATMP Task Force and Technology Work Stream. Leverage ABPI'/ BIA global outreach and ensure visibility of and alignment on technical and legal issues at the European and global level. | Q1-Q2 2017 |
| Grow stakeholder engagement - Maintain effective connection across industry regulatory forums, including ABPI- PQEN, BIA-MAC | Throughout 2017 |







Medicines Manufacturing in the UK 2017

MMIP Close Out by Ian McCubbin

Senior Vice President for Global Supply and Manufacturing, GSK & Former Chair MMIP





ATMP TASKFORCE

Completed 6 months of Task force engagement activities – Skills, International Competitiveness and Manufacturing/ Technology

ABPI/PWC delivered project to define the 'size of the prize'.

End of November: Final report presentation at MISG/ Bioprocess

FISCAL & BUSINESS ENVIRONMENT

- Concluded GVA demystification work and developed Fiscal guide and webinar
- Continued work with UKTI to market UK's fiscal and manufacturing offers.

TECHNOLOGY AND INNOVATION

- Refresh of the T&I roadmap nearing completion for future theme selection.
- Built portfolio of projects: ADDoPT, REMEDIES
- Letters of support for MMIC and UCL manufacturing hub bid
- Ongoing project scouting: NHS batch optimization, electronic leaflets, analytics, among others

SKILLS

- Supported SIP report providing industry's angle and developed MMIP skills plan
- Published MMIP Skills Solutions / Actions document to define industry objectives
- Commencing implementation of action plan

REGULATORY

- Established links across other regulatory groups and UK Industry Associations
- Developing concept paper with MHRA to explain existing regulatory flexibilities
- Promoted MHRA's Innovation Office and 'one-stop-shop', including case studies.

Lunch & Site Tours



| Group | Agenda | | |
|--|--|--|--|
| Group 1 (Tax - Red) | 12:00 – Zoladex Tour followed by Lunch | | |
| Group 2 (Skills - Green) | 12:00 – Packing Tour followed by Lunch | | |
| Group 3 (Technology - Yellow) | Lunch followed by Zoladex Tour @ 12:45 | | |
| Group 4 (Financial incentives - Blue) | Lunch followed by Packing Tour @ 12:45 | | |
| All back in the Saffron Rooms by 14:00 | | | |





Review of 2017 MMIP activity will be showcased at BIA's

Annual bioProcessUK Conference

29-30 November, Cardiff

For further details please contact: aengland@bioindustry.org





For further details please contact

aengland@bioindustry.org



save, connect, influence

Taxis



- We have notified local companies, however, to avoid delays leaving site, you are best to prebook your taxi to the station
 - Options include:
 - Macclesfield Radio Cars
 - 01625 421 111 or 01625 421 112
 - Pronto Taxi 07818991663





Medicines Manufacturing in the UK 2017

How manufacturing might be evolving: current thinking on Advanced therapies and Advanced Manufacturing

Introduced by: Ian McCubbin

Supported by: Prof Lionel Clarke

Steve Bagshaw

Andy Evans

Roger Kilburn







MMIP Response to the Industrial Strategy by Andy Evans





Key asks from MMIP in letter to Sir John Bell



Focus on Advanced Therapies and Advanced Manufacturing underpinned by 6 enablers:

- 1. Further improvements to Tax and Capital Allowances
- 2. Skills Support
- 3. Financial Support and Incentives
- 4. Innovation Support
- 5. Strong Account Management
- 6. Market Access Improvements







Tax & Capital Allowances
By Richard Turner

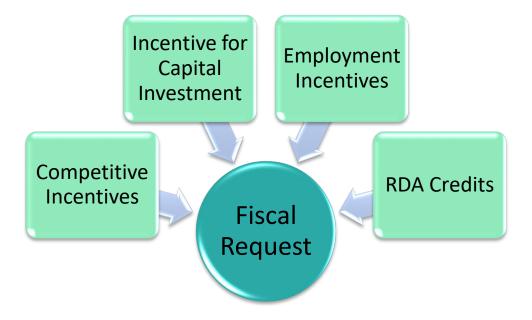






Industrial Strategy – The Fiscal Request





MMIP's submission to Sir John Bell

Tax is a key issue in making manufacturing decisions. The UK situation has improved with a lower rate, targeted incentives such as the patent box and R and D credits but needs to remain competitive. An area that has lagged behind is improvements to the environment for encouraging high tech manufacturing and associated jobs and we strongly recommend targeted tax relief on incremental capital investment in order to improve the UK's position of 17th in the G20. This would cover incremental high tech buildings, and plant and machinery at rates similar to R&D incentives and would set the UK apart. Tax credits for incremental high tech jobs would also encourage investment and associated employment. When SMEs critically need to invest in GMP capability they would benefit greatly from tax credits, and we have recently submitted a proposal for an R&D allowance credit for capital investment as part of HMT's current review of research incentives.





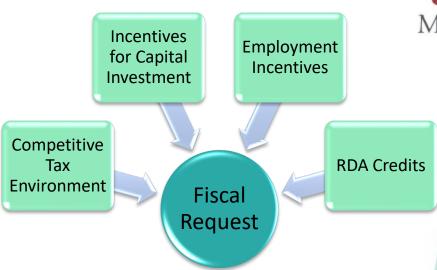
Industrial Strategy – The Fiscal Request



Tax Breakout - Discussion

- 1 Is the UK competitive?
- 2 Which territories offer the greatest competition?
- 3 Has the fiscal environment (UK and International) influenced investment decisions?
- 4 What should be preserved in the UK?
- 5 What are the principal disincentives?
- 6 What fiscal improvements would make most difference?
- 7 Tax incentives or Government grants?

Request – Case studies and representation







Skills
By Alex Felthouse





Skills Discussion Points



- We are faced with challenges in attracting skilled people to our industry
- A strategy is required to enhance the focus on STEM subjects
- The need for an improved HE offering in practical skills for undergraduate, masters and doctoral levels.
- Provision of regional technical training centres



Technology & Innovation
By Magda Papadaki & Mike Sullivan

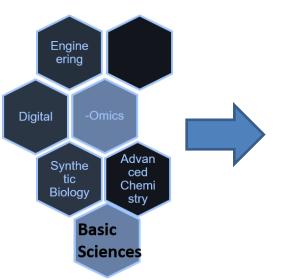




Sustain investment in the UK's science and manufacturing infrastructure

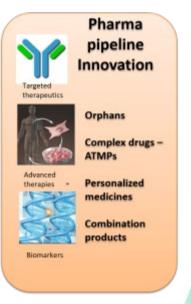


 Strengthen the UK research base by creating unique opportunities in the areas of personalised medicines, cell and gene therapies, genomics, diagnostics and digital technologies, as well as the underpinning tools, technologies and processes









To achieve this it will be important that funding is directed across a number of enabling areas, beyond the ongoing funding for basic science, that cover:

- 1. Cross-disciplinarity and collaboration across sectors and stakeholders
- 2. Measures to improve UK commercialisation and industrialisation of research
- 3. Skilled workforce and sustained talent pool
- 4. An enabling and future-proofed regulatory framework





1. REVOLUTIONIZING MEDICINES THROUGH

ADVANCED MANUFACTURING TECHNOLOGIES



A portion of funding should be devoted to the design and launch of specialized capacity facilities, aligning technology development and commercialization, to support the generation and application of advanced manufacturing technologies, specifically:

- New Modalities' Centre of Excellence, focused on the production of highly potent assets, as well as sterile capability development.
- Medicines Manufacturing Innovation Centre (MMIC) Building on current MMIP proposal on continuous manufacturing (£28m), further developed to include: digital capabilities and potentially complex chemistry/enzymes and additive technologies (3D printing).
- Packaging and Device Centres of Excellence, designed to develop and produce optimised packaging solutions for medicines and the medicines supply chain.





2. ADOPTING THE RECCOMENDATIONS OF THE ATMP MANUFACTURING TASKFORCE



It is also critical that part of the £2b Fund is also geared towards meeting the recommendations of the ATMP Taskforce report:

- Support advanced therapies manufacturing investments in 2016/17, providing a level of competitive or loan/grant funding in the range of £30m p.a. over three years to attract and anchor a calculated £350m in ATMP manufacturing investment.
- Establish a network Gene Therapy Treatment Centres, with public funding (£30m) delivered through a competitive process.
- Establish competitive Government funding to support viral vector capability within two years, through the development of a specialist manufacturing operation that will also leverage existing infrastructure.
- ATMP end-to-end talent plan (£1.5m): support the creation and implementation of an end-to-end talent plan covering multiple entry-points, from manufacturing technicians to post-doctoral and professional levels.





Financial incentives
By Andy Evans







Focus Groups





Focus Groups



| Group | Topic | Location | Facilitators |
|-------|-------------------------|--|---|
| 1 | Tax | JC Ryle (2 nd Floor) | Richard Turner Sarah Golding |
| 2 | Skills | Thomas Wardle (2 nd Floor) | Alex Felthouse Tim Windle |
| 3 | Tech & Innovation | Saffron Rooms (1st Floor, here) | Magda Papadaki Mike Sullivan Andy Jones |
| 4 | Financial Incentives | Charles Roe (2 nd Floor) | Andy Evans Matt Doherty |





Medicines Manufacturing in the UK 2017

Focus Group Feedback & Open Discussion

Chaired by: Andy Evans

Supported by: Richard Turner

Alex Felthouse

Mike Sullivan

Magda Papadaki







Closing Remarks by Andy Evans







Drinks Reception

Security are on call until 18:30. Please leave the building before this time







Medicines Manufacturing The Tax Environment

Richard Turner







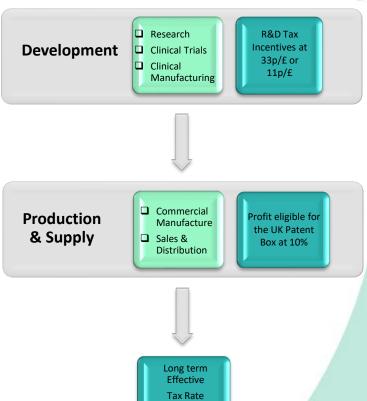


Benefits of retaining medicine manufacture in the UK



The UK has created a very favourable tax environment for innovation and commercialisation. In the past, UK companies would locate elements of the supply chain across two or more territories in order to optimise the tax position. The UK tax landscape has changed in recent years to present a much more compelling case for retaining the entire supply chain from development through to manufacture in the UK. The tax benefits of this are set out below with further efficiency through the lower cost of compliance with reduced cross border transactions and product flow.

- □ Tax rates The current corporation tax rate is 20% regardless of the size of the business and will reduce to 17% by 2020. This is one of the lowest rates of tax among the developed economies, such as France (33%), Germany (30%-33%), US (35%-40%), Japan (30%), Ireland (12.5% trading income/25% non-trading income), Switzerland (10%-25%).
 - **Patent box** Tax on profits attributable to qualifying patented technologies is reduced to 10%. Enterprises undertaking all development and manufacture in the UK, might therefore expect a log term effective tax rate in the region of 11%-13%.
 - **R&D relief** Available to all companies undertaking qualifying R&D activities inc manufacturing for clinical development
 - For SMEs (less than 500 employees and either Annual turnover <€100m or Balance sheet <€86m) the relief ranges between 25p-33p/£ on qualifying expenditure and either reduces the tax liability or is repaid as a credit. Qualifying expenditure includes work contracted out to 3rd parties.
 - Where a group exceeds the SME criteria, it can claim a taxable credit (RDEC) of 11p/£ of qualifying expenditure. For Large Enterprises (non SMEs), qualifying expenditure does not include work contracted to 3rd parties or overseas connected companies.
- Clinical manufacture With planning, a significant element of clinical manufacturing expenditure should attract the R&D incentive either at 33p/£ or 11p/£. This would include labour cost, materials and attributable utility costs. If this activity was undertaken in-house but outside the UK not only would these incentives no longer be available for large enterprises, it could impact the amount of patent box relief that is subsequently available.
 - **Tax losses** These can be carried forward indefinitely and offset against future profits and therefore shelter taxable income arising after product launch. Group relief also allows effective loss relief between connected parties.



11% - 13%







Benefits of the UK for EMEA medicines manufacture



The UK as a Holding Company

- There is no withholding on dividends paid by UK companies
- There is typically no corporation tax charged on dividends received from overseas subsidiaries
- There is a capital gains tax exemption for gains arising on the sale of substantial shareholdings (where the holding company owns more than 10% of the ordinary share capital).
- □ **Double Tax Treaties** The UK enjoys a comprehensive treaty network worldwide, resulting in the reduction or possible elimination of withholding taxes.
- ☐ Tax Losses These can be carried forward indefinitely and offset against future profits and therefore shelter taxable income arising after product launch. Group relief also allows effective loss relief between connected parties.
- ☐ CFC regime That only targets profits artificially diverted from the UK.
- Tax Relief on Intangible Assets Intellectual Property Rights transferred to UK companies will attract tax relief in the UK as the assets are amortised or at 4% p.a.







Medicines Manufacturing Skills

Alex Felthouse Eisai Manufacturing Ltd



