GREEN PAPER
From Challenges to Opportunities:
Towards a Common Strategic Framework for EU Research and Innovation funding

1 General comments:

ECHAMP's views on a Common Strategic Framework for EU Research and Innovation funding

The European Coalition on Homeopathic and Anthroposophic Medicinal Products (ECHAMP) welcomes the Commission's Green Paper which launches a public debate on the future of EU activities in the field of research and innovation. Since it is the intention to come forward with specific proposals for funding programmes by the end of this year, we appreciate this timely opportunity to get actively involved in this highly important debate.

ECHAMP agrees with the Commission that research and innovation should be regarded as the 'key drivers of social and economic prosperity and environmental sustainability'. In this respect, the EU's 'Europe2020' strategy's objective to increase R&D spending to reach 3 % of GDP by 2020 can only be regarded positively. As part of 'Europe2020'', the Innovation Union flagship initiative advocates a strategic and integrated approach to research and innovation. This entails a welcome stronger focus on

- societal challenges and key technologies,
- the need to facilitate collaborative and industry-driven research,
- streamlining the various existing EU R&D funding instruments,

The Green Paper outlines the Commission's intention to bring together the full range of EU instruments for research and innovation work together in one Common Strategic Framework, with the aim to improve the efficiency of research and innovation funding at national and EU levels.
Furthermore, the Paper outlines various 'unprecedented challenges requiring innovative solutions', such as the need to return to growth and higher levels of employment, demographic development and the need to retain and reinforce its competitive position in the face of globalisation. This Common Strategic Framework will focus on 'addressing societal challenges, encouraging the competitiveness of Europe's industries and the excellence of its scientific and technological base'.
Such a Framework would provide one single point of entry as well as a one stop shop for providing advice and support to participants as well as a simpler and more efficient and streamlined structure. Within this context the Commission notes that 'consideration is needed to identify those challenges where EU level interventions can make a difference, while avoiding overly prescriptive scientific and technological choices'.

In addition to welcoming the above, ECHAMP is pleased to note the focus on enhancing the welfare of citizens and secure business competitiveness and the hugely important role and contribution of research in this respect. Linking research and innovation activities more effectively as well as making a better connection between R&D and policy objectives within a simplified and coordinated framework makes good sense. However, while this effort seems

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plausible and laudable in theory, efforts would need to be made to ensure that the aims of the specific initiatives will not be watered down as a result of bringing them all together. Moreover, bringing together four sizeable and complex initiatives into one coordinated framework will require a massive effort to ensure efficiency as well as the right (and balanced) focus on the wide variety of priorities currently financed by these programmes. Therefore, careful reflection on the governance and transparency of this common framework will be needed to ensure effectiveness as well as focus and desired results.

In this respect, the lessons learnt from the various existing initiatives are highly relevant for the development of a future EU R&D strategy. As underlined by the Green Paper, it is clear that the field of R&D will stand to gain from clear objectives (while retaining the flexibility to respond to emerging policy needs), less complexity, less duplication and fragmentation, easier access to participation, and better communication of objectives and the relevance of actions.

ECHAMP particularly welcomes the reference to the need and intention to better include the end-users of innovation, as this will ensure the relevance and take up of products and services.

2 More specific comments:

ECHAMP's views on the content of a Common Strategic Framework

While ECHAMP is aware that the content of the future Framework is not strictly the objective of this Green Paper, we would like to take the opportunity to outline some of our recommendations in this respect, more specifically in the area of health.

Who will decide on and develop the content of future EU R&D activities and programmes?

While the Commission is right in underlining the need for careful consideration of topics where EU R&D can have added value, it is not clear what this process of consideration will entail, e.g. who will be involved in proposing and deciding on R&D priorities and how these will be addressed and implemented. According to the Green Paper, the European Innovation Partnerships (EIP) - (such as the recently launched pilot addressing Active and Healthy Ageing - will play an important role, bringing together supply and demand side measures in addressing societal challenges. The EIP's intention to stimulate cooperation with and between all stakeholders involved in addressing the needs of end-users in specific and well-defined areas would seem a sound way forward in ensuring that innovation addresses real needs.
However, it is too early to tell how effective the EIP will be as the first pilot is only now about the take off; since a first assessment of this venture will not take place before the end of the year – in other words, not until after proposals for specific funding programmes will have been published – it seems to ECHAMP that it would be wise not to solely rely on these Partnerships as an implementation tool.

The need to involve stakeholders in setting priorities

ECHAMP would like to urge the Commission to strive for ultimate transparency and clear governance in deciding on which areas should be included in EU funded R&D programmes. If it is indeed the intention to actively include users, these users should also be actively involved with the development of the CSF's content.

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Health research as an indispensable area towards prosperity and growth

Health is currently one of the 9 priority R&D areas within FP7. Health is also one of the basic requirements if the 'Europe2020' objectives are to be reached as only a healthy population can contribute to a functional and effective labour market and economic growth.
Health research – approached in a holistic way, including prevention, health promotion, treatment, care, health services delivery and health outcomes– would therefore seem to be one of the indispensable areas where EU research and innovation should focus and ECHAMP would like to urge the Commission to maintain this hugely important area on its priority agenda.

Health research should include Complementary Medicine

In the area of treatment, ECHAMP would like to urge the Commission to consider traditional allopathic treatment as well as complementary medicine. Our rationale in this respect is as follows:

In the EU, individuals are increasingly vocal and set on making their own choices. This is particularly pertinent in the field of healthcare where the traditional 'doctor knows best' paradigm is giving way to patients and consumers wanting to be involved with their own healthcare and treatment options and decisions. A trend towards a greater demand for choice and quality of life can clearly be witnessed. Therefore, healthcare systems should offer freedom of choice of healthcare, treatment and therapy (including healthcare services offered by recognised complementary and alternative medicine providers (CAM) as well as homeopathic and anthroposophic medicinal products. EU level R&D can make a contribution to developing this plurality of health choices and promote access to and availability of the services that consumers and patients require and prefer.

Barriers towards R&D in Complementary medicine should be overcome

Currently however, CAM does not feature very highly on the EU research and innovation agenda. Yet, over a 150 million EU citizens make use of CAM healthcare services and the respective. medicinal products[1]. Not only are more and more citizens actively choosing to make use of these therapies; these products are also sustainable from an environmental, socio-economic and public health point of view. Therefore, ECHAMP believes that barriers to investing in research and development in the field of CAM should be overcome as this area offers great deal of potential for real life innovation for individuals of all ages. For instance, a recent large scale survey, [2]. carried out in the Netherlands, demonstrates that patients whose GP has additional training in homeopathy, acupuncture or anthroposophic medicine have substantially lower health care costs and lower mortality rates. The lower costs result from fewer hospital stays and fewer prescription medicines.

[1] source: Charité University, Berlin

[2] http://members.ziggo.nl/peterkooreman/gpcs.pdf

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Apart from being positive for patients and their families, this is interesting news for any health insurance company and any government that want to reduce the soaring healthcare costs and increase life expectancy and quality of life.

Given the above, the research community can support the quest for more sustainable solutions for changing health care needs, choices and preferences. It would help to find alternatives for the strong prescription remedies and medicines which have many side effects and, given the fact that our population is ageing, are increasingly taken in combination as a result of co-morbidity. Concomitant intake of several drugs for a huge variety of (not only degenerative) diseases are leading to a multiciply of adverse drug reactions (ADR) in elderly patients, and therefore any measure to improve patient´s safety, compliance, and quality of life should be stimulated. The recent new directive on pharmacovigilance measures constitutes a good first step into more safety for patients.
Further developing the CAM products and services area should be considered as desirable innovation, which is in line with both health and more safety as well as with individual requirements.

FP7 project: CAMbrella

A concrete example: FP7 is currently sponsoring a pan-European multi stakeholder research network for complementary and alternative medicine, CAMbrella[3]. The goal of this collaboration is to develop a roadmap for future European research in CAM that is appropriate for the health care needs of EU citizens, and acceptable to national research funders and healthcare providers. The project will enable meaningful, reliable comparative research and communication within Europe and create a sustainable research and policy structure. Amongst its specific objectives are the creation of a knowledge base that facilitates our understanding of patient demand for CAM and its prevalence, a review the current legal status and policies governing CAM provision in the EU and an exploration of the needs, beliefs and attitudes of EU citizens with respect to CAM. The project will develop and propose a roadmap for sustainable and prioritised EU research in the area of CAM, which could serve future EU-sponsored R&D in this area.

EU R&D can support knowledge development as well as plurality of choice

The current lack of 'scientific openness' towards innovation which can be offered by CAM is not in line with the opinion of a large number of (satisfied) users. Therefore, In view of the large number of EU citizens making use of CAM (including older people at home or in care institutions, which is highly relevant within the current European Innovation Partnership on Healthy and Active Ageing) it would be useful to have more information about

- which specific medicinal products are being used
- for what clinical symptoms and in which indications these are being used
- treatment effects, safety profile and the level of satisfaction and QoL with these medicinal products
- level of access and availability of these medicinal products
- how many ADR's can be avoided by the integration of CAM into healthcare provisions
- what could be the socio-economic impact of such an integration

[3] http://www.cambrella.eu/home.php

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In conclusion....

From ECHAMP's point of view, the real challenge is to develop genuine plurality of options and choice in healthcare, and to widen the conventional medicine perspectives to include different proven and tested natural medical traditions such as homoeopathy and anthroposophic medicine. The EU research agenda can and should make a contribution towards meeting this challenge.

ECHAMP remains as the Commission's disposal for further information and support.

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