



Staff Working Document 'Investing in Health'
Accompanying the document
Towards Social Investment for Growth

The European Coalition on Homeopathic and Anthroposophic Medicinal Products (ECHAMP) is the European association of companies that work closely together to ensure that its members can meet the demand from users and prescribers across the EU for homeopathic and anthroposophic medicinal products. This document sets out our comments on the Commission's Staff Working Document 'Investing in Health'.

Comments on the Staff Working Document's three main themes

ECHAMP warmly welcomes the Document, as it represents a genuine effort to bring forward a comprehensive European approach to health care and health care delivery. The fact that this Document is part of a more overarching effort to advocate Social Investment in general clearly highlights the Commission's recognition of the crucial importance of good health to realizing the EU's objectives in relation to growth and sustainability.

The Document focuses on three main themes, which should all contribute to health systems reform, ensuring access to high quality healthcare as well a more effective use of scarce resources:

- Investing in sustainable health systems
- Health as an investment in human capital
- Investing to reduce inequalities in health

ECHAMP's comments on each of these can be found below.

1 Investing in sustainable health systems:

A ECHAMP agrees with the Commission that health systems are at the core of the EU's high level of social protection. It is true that the economic crisis, demographic ageing and changes in the types of diseases affecting the EU population all underline the need to reform those systems, in order to keep them accessible as well as sustainable. The Commission emphasizes the need for efficiency gains and provides a number of areas where these gain could be effectuated , such as 'unnecessary hospitalization and use of specialists, strengthening primary care, encouraging the use of less expensive equivalent (generic) drugs, and using health technology assessment to evaluate the cost-effectiveness of health technologies as a basis for decision making'.

ECHAMP firmly believes that anthroposophic medicine and homeopathy have a huge role to play in obtaining efficiency gains. Currently, over a 150 million EU citizens make use of homeopathic and anthroposophic medicinal products (HAMPs) and this number is on the increase. Not only are more and more citizens actively choosing to make use of these therapies; these products are also highly sustainable from an environmental, economic, safety and public health perspective.



B Demographic ageing is one of the main current economic and social challenges and one of the main drivers of the need for more efficient use of resources. In this respect, ECHAMP would like to highlight the findings of a recent large scale survey carried out in the Netherlands. This clearly demonstrated that patients whose GP has additional training in homeopathy, acupuncture or anthroposophic medicine have substantially lower health care costs and lower mortality rates. Moreover, two recent observational studies conducted in primary care practices in Germany showed a beneficial role of homeopathic and anthroposophic medical treatment in the long-term care of older adults.

These results are obviously relevant within the context of the Staff Working Document as they make clear that considerable health care savings can be made when homeopathy and anthroposophic medicine are integrated as a part of mainstream health care delivery. In addition, finding alternatives for the strong (and in many cases, costly) prescription medicines with their many negative side effects would also have positive effects: in terms of patient safety, in terms of better health outcomes and in terms of cost saving.

ECHAMP therefore advocates that healthcare systems should be based on the principle of 'integrated healthcare', offering freedom of choice of healthcare, treatment and therapy, including homeopathy and anthroposophic medicine.

Example – Link

Health technology assessment rightly plays a major role in decisions about costs and resources. Several recent studies - published in highly regarded scientific magazines- have made found that homeopathy and anthroposophic medicines are effective¹

2 *Health as an investment in human capital*

ECHAMP warmly welcomes the Commission's recognition that health is a crucial element in maintaining and boosting economic growth as good health enables people to contribute to their direct surroundings as well as to the wider society. Therefore, the Commission's strong emphasis on the need for health care systems and policies to focus on disease prevention and health promotion is entirely justified.

Example – Link

Homeopathy and anthroposophic medicine can support efforts to prevent illness, for instance in the case of allergies².

1

<http://www.homeoinst.org/news/homeopathy-effective-according-swiss-federal-report>
<http://www.springer.com/medicine/complementary+%26+alternative+medicine/book/978-3-642-20637-5>
<https://www.ncbi.nlm.nih.gov/pubmed/16387585>
<https://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0048798/>
<http://www.ivaa.eu/?p=46>

2

<http://www.ncbi.nlm.nih.gov/pubmed/16387585>



3 *Investing to reduce inequalities in health*

A The third main area addressed by the Document is the need to address and reduce health inequalities. It is indeed still the case that ‘health outcomes vary considerably within and between Member States’ and that universal access to healthcare services is required to change this. Access to treatment is an important element in this respect and that also relates to the availability of medicines – the medicines that patients choose themselves. It is an indisputable fact that the role of the health care system as a supporter of patients to manage their own illness is becoming increasingly important. As already outlined, increasing numbers of patients and consumers specifically choose homeopathy and anthroposophic medicines as an alternatives to or complement of allopathic medicine.

Example – Link

However, recent studies point out that these medicines are used by people from the upper social classes in society as these medicines are usually not reimbursed³; in other words, unequal access is an issue in our area.

B Individuals are increasingly vocal and determined to 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 actively involved with their own healthcare, treatment options and decisions.

C ECHAMP has recently commissioned a study to PWC, with the aim to look into the availability of anthroposophic and homeopathic medicinal products in a representative selection of EU member states.

The findings can be summarised as follows:

In terms of *demand*, it was found that there is a significant to high demand for homeopathic and anthroposophic medicinal products in at least two thirds of EU Member States, and this applies to countries both with and without a long-term tradition for these products.

With respect to *availability* of these medicinal products it became clear that this is insufficient and that the demand cannot always be met. The types of products most widely available in pharmacies are those requested for self-medication.

This relates to the fact that implementation and enforcement of European medicines legislation for this sector has been slow. It is incomplete, even twenty years after its adoption. Divergent implementation, interpretation and enforcement policy in the Member States make it extremely difficult for companies to operate across Europe.



Allensbach_survey_E
N_4232.pdf

³ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3307506/> and



ECHAMP feels therefore that measures should be taken to ensure that patients and prescribers have easy access to the products and treatments of their choice. Not only is this in line with current paradigm changes, it will also contribute to combating health inequalities.

In conclusion:

ECHAMP, with its membership of leading manufacturers of homeopathic and anthroposophic products should be considered an expert in this area and we are ready and willing to offer this expert knowledge. Our association has close contacts with organisations representing patients, doctors, practitioners and researchers and is used to work in a multi-stakeholder environment. Given the increasing interest of European citizens in integrated health care alternatives to allopathic medicines, we feel that ECHAMP has a role to play in the further development of future EU thinking on health reform and better use of scarce resources.

Homeopathic and anthroposophic medicinal products (HAMPs) are part of the two traditional European medical approaches, homeopathy and anthroposophic medicine. These have their part to play in responsible and sustainable medication and self-medication. For the sake of public health as well as the increasing emphasis on patient-centredness and patient-choice, these medicinal products should be considered a natural part of healthcare options and debates on the best ways to treat patients and provide the best possible care.