



COMMUNICATION FROM THE COMMISSION
On effective, accessible and resilient health systems

A commentary

Introduction

The European Coalition on Homeopathic and Anthroposophic Medicinal Products (ECHAMP) warmly welcomes the Commission's efforts to develop an EU and member state agenda to ensure health systems to be more effective, accessible and resilient.

ECHAMP acts as the voice of the vast majority of the industry for homeopathic and anthroposophic medicinal products in Europe. Our main objective is to enable our members to meet the increasing demand from users and prescribers across the EU for homeopathic and anthroposophic medicinal products; in that respect, we aim to cooperate with the EU institutions as effectively as possible.

As producers of homeopathic and anthroposophic medicinal products, ECHAMP would like to contribute to this debate. This short document therefore outlines our views and issues.

Our comments

Good health is the basis for individual wellbeing, sustainable health and social security systems, thriving workforces and well-functioning economies.

As underlined by the Communication, European health systems face growing common challenges: increasing cost of healthcare, population ageing associated with a rise of chronic diseases and multi-morbidity leading to growing demand for healthcare, shortages and uneven distribution of health professionals, health inequalities and inequities in access to healthcare. Sustainability has also been an issue across the EU, against the backdrop of the economic crisis and the austerity measures that have been put in place as a result.

It is encouraging to note the Commission's attention to these issues, as well as the coordinating and guiding role it has assumed in this respect, despite the limited EU-level health remit.

The fact that Member States are increasingly willing to cooperate in the area of health is a direct demonstration of the positive effect of the Commission's actions. Moreover, health – as recognised as a value in itself as well as a precondition for prosperous societies and economies – is increasingly and continuously rising up the EU agenda, as can be seen by strong references to health in the 2014 Annual Growth Survey (AGS) and Europe 2020. ECHAMP warmly welcomes this development.

The Communication aims to provide a framework for action under three headings:

- Strengthen the effectiveness of health systems
- Increase the accessibility of healthcare
- Improve the resilience of health systems

ECHAMP would like to make the following suggestions for any future work in these areas:

1 Strengthening the effectiveness of health systems:

This Communication underlines the focus of the Communication, i.e. the ability of health systems to produce positive health outcomes. It makes the case for proper measurement of this effectiveness,



and outlines achievements in this area as well as the initiatives already taken at EU level. ECHAMP would like to emphasize the following factors as crucial elements of well-functioning health systems:

a. Patient choice, informed patients and self-management of health

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. This is particularly pertinent in relation to chronic diseases, where the various stages of the patient pathway require different levels of involvement.

Homeopathic and anthroposophic medicinal products (HAMPs) are part of the two traditional European medical approaches, homeopathy and anthroposophic medicine. Currently, over a 150 million EU citizens make use of HAMPs¹ (OTC and via prescriber) and this number is on the increase. These products 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 the best possible care.

b. Increase health research efforts

Health research – approached in an integrated and patient-centred way, including prevention, health promotion, treatment, care, health services delivery and health outcomes– is one of the indispensable areas where EU research and innovation should focus. ECHAMP therefore welcomes the strand 'healthy ageing, demography and well-being', as part of Horizon 2020.

Health research in relation to health systems should include topics relating to patient preference and choice, integrated health care systems and the impact of health systems on well-being. It should also address the effect of treatment, both of allopathic as well as of complementary medicine in a spirit of integration and for the benefit of public health.

Moreover, EU level R&D can make a contribution to developing a plurality of health choices and promote access to and availability of the services that consumers and patients require and prefer.

2 Increasing the accessibility of health systems

ECHAMP fully shares the Commission's statement that health systems must be accessible, as also stipulated by the European Social Charter. This emphasises the importance of transparent criteria for access to medical treatment, and the obligation for States to have an adequate healthcare system which does not exclude parts of the population from receiving healthcare services'. Again, we would like to add some suggestions:

a. Availability of the healthcare of choice

The Commission lists availability as one of the determinants of access to healthcare. In this context ECHAMP would like to inform the Commission that we have recently elaborated an availability report² which incorporates two reports of surveys carried out by PwC. The main findings can be summarized under the following 5 headings:

¹ source: Medizin Aspekte 2012: http://www.medizin-aspekte.de/2007/11/alternativmedizin_4354.html

² 'The Availability of Homeopathic and Anthroposophic Medicinal Products in the EU'



- **Demand:** There is 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.
- **Availability:** Availability of homeopathic and anthroposophic medicinal products in the EU is insufficient and the demand cannot always be met. The types of products most widely available in pharmacies are those requested for self-medication.
- **European legislation:** Implementation and enforcement of European medicines legislation for this sector has been slow and is very 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.
- **Regulatory environment:** The regulatory environment, including assessment capacity and policy at national level, is not proportionate to the large range of stocks and multiple finished medicinal products produced from these stocks, which are used in homeopathic and anthroposophic therapy. In many Member States the number of registered products poorly reflects the high numbers of homeopathic prescribers.
- **Sustainability:** Availability is threatened in some Member States by the lack of a registration process, and in others by an incomplete process for the renewal of existing registrations. The bureaucratic and regulatory burden is such that it is not sustainable to maintain registrations for the full range of medicinal products required for proper practice of these therapies.

The report supports our conclusion that it is EU regulation that constitutes a serious bottle neck to sustainable availability. We have discussed this on previous occasions with health Commissioners and their staff, and would like to call on the next Commission, taking office at the end of this year, to ensure that this issue will be addressed in a satisfactory manner.

3 Improving the resilience of health systems

According to the Communication, sustainability is a key determinant for the resilience of health systems. While ECHAMP fully agrees with the factors listed that help or hinder sustainability - stable funding mechanisms, sound risk adjustment methods, good governance, sound information flows , adequate costing of health services adequate health workforce and health systems performance assessment – we would also like to outline the potential contribution of homeopathy and anthroposophic medicines as follows:

a. Contributing to sustainable health systems

Apart from their positive impact on the health of individuals and patient satisfaction³, HAMPs have advantages in relation to finances, both for the patients themselves as well as for Member States' troubled health budgets. Developing this product and services area should be considered as desirable health and societal innovations, which are in line with both health as well as individual requirements. In addition, it will increase sustainability of health care provisions in general.

³ <http://members.ziggo.nl/peterkooreman/gpcs.pdf>



In this respect we would like to refer to a large scale survey⁴, carried out in the Netherlands, demonstrating that patients whose GP has additional training in homeopathy, acupuncture or anthroposophic medicine have substantially lower health care costs and lower mortality rates. Two other studies conducted in primary care practices in Germany⁵ showed a beneficial role of homeopathic and anthroposophic medical treatment in the long-term care of older adults. In addition, finding alternatives for the strong prescription medicines with their many negative side effects would have positive effects, in terms of finances, patient safety as well as better health outcomes. And finally, HAMPs reduce the threat of antibiotic resistance as much less antibiotics can be used (demonstrated by scientific research⁶).

b. Integrated healthcare systems: a necessity for choice, safety and cost-effectiveness

According to the Communication, integration of care should take place between different levels of healthcare (primary care, hospital care, etc.) as well as between health and social care, particularly with regard to older people or people with chronic illnesses.

ECHAMP maintains that healthcare systems should be based on the principle of 'Integrated healthcare'⁷, offering freedom of choice of healthcare, treatment and therapy, including homeopathy and anthroposophic medicine.

Conclusions

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 to further develop the debate on effective, accessible and resilient health care systems.

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 more integrated health care alternatives to allopathic medicines, we feel that ECHAMP can contribute to the current discussions on health systems and their contribution to better health outcomes. We would be happy to fulfil that role.

⁴ <http://members.ziggo.nl/peterkooreman/gpcs.pdf>

⁵ <http://www.biomedcentral.com/content/pdf/1471-2318-10-48.pdf>

⁶ http://camdoc.eu/CAM_for_Europe/EventsEurocam.html

⁷ <http://www.regione.toscana.it/-/coordinamento-della-rete-toscana-di-medicina-integrata> and <http://www.usl9.grosseto.it/default.asp?idLingua=1&idContenuto=939>