



Professor Jan de Maeseneer
Chair Expert Panel on Effective Ways of Investing in Health
c/o European Commission, DG SANCO

Brussels, 16 September 2014

Dear Professor De Maeseneer,

ECHAMP, the European Coalition on Homeopathic and Anthroposophic Medicinal Products, aims to enable its members to meet the demand from users and prescribers across the EU for these medicinal products. It works to develop the industry for homeopathic and anthroposophic medicinal products so as to ensure availability of medicines for self-medication and medicines recommended by prescribers. It advocates in favour of an appropriate regulatory environment for these products in the EU.

ECHAMP is pleased to note the effort made by the Commission and the Expert Panel on Effective Ways of Investing in Health to produce an opinion on a future EU agenda on quality of health care with a special emphasis on patient safety. We warmly welcome this opinion, which is comprehensive, multi-faceted and highly balanced.

ECHAMP is particularly happy to note the Expert Panels' five core dimensions which should apply to all health services, i.e. they should be

- Effective, and improve health outcomes;
- Safe, and prevent avoidable harm related with care;
- Appropriate, and comply with current medical knowledge as well as meeting agreed standards;
- Patient-centred, and involve patients/people as key partners in the process of care;
- Efficient and equitable, and lead to the best value for the money spent and to equal access to available care for equal need, utilization and equal quality of care for all.

All five dimensions are directly in line to what our sector is contributing to health care: t: The quality and safety of HAMPs are well documented, and a number of studies demonstrate their effectiveness and cost-effectiveness¹.

Quality:

Licensed homeopathic and anthroposophic medicinal products comply with the quality standards of official pharmacopoeias for manufacture and quality control. They are produced according to Good Manufacturing Practice.

Safety:

Long-term experience, as confirmed by studies, demonstrates that these medicines have a high safety profile. The frequency of adverse reactions to homeopathic and anthroposophic medicinal products is very low and serious adverse reactions are very rarely reported.

¹ See www.facultyofhomeopathy.org/research/ and www.ivaa.info/research/ for research references for each of these topics.



Effectiveness

A significant number of clinical studies demonstrate the effectiveness of homeopathy and anthroposophic medicine. In addition, observational studies consistently demonstrate real-world effectiveness - that is significant decrease of disease severity and major improvements for quality of life.

Cost-effectiveness

Patients whose GP knows homeopathy or anthroposophic medicine tend to have lower costs and live longer. Integration of homeopathy and anthroposophic medicine with conventional treatment is associated with better clinical outcomes for similar or lower costs. Homeopathic and anthroposophic medicines are normally less expensive than conventional prescription drugs, because they are generic, non-patented and non-patentable medicinal substances, produced at low cost. These therapies have the potential to offer significant cost savings to public health bodies and the wider economy.

Patient-centred:

The patient truly is at the centre in homeopathy and anthroposophic medicine, as an integral part of the therapeutic system. A growing number of patients and consumers actively choose our products for their health care: currently three out of four Europeans know about homeopathy and of these, 29% use it for their health care. In addition, over 100 million European citizens use over-the-counter or prescribed homeopathic medicines.² Respecting and enabling patient choice is highly important.

In conclusion, we would again congratulate the Expert Panel on this Opinion, and would be happy to contribute to further work in this area.

With many thanks for your attention and interest,

Yours sincerely,

A handwritten signature in blue ink, appearing to read "G. Klein", enclosed in a yellow rectangular box.

Gesine Klein
President

A handwritten signature in blue ink, appearing to read "Mol", enclosed in a light blue rectangular box.

Christiaan Mol
Secretary General

² Commission Report to the European Parliament and Council on the Application of Directives 92/73 and 92/74, Com(97) 362 final