

European Commission  
DG Health and Food Safety  
Rue Breydel 4  
B-1040 Brussels

Brussels, 14 July 2016

## **Opinion of the Expert Platform of Effective Ways of Investing in health Access to Health services**

### **ECHAMP's point of view**

#### **Introduction**

The European Coalition on Homeopathic and Anthroposophic Medicinal Products (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 improved access to healthcare across the EU. This short document therefore outlines our views and issues.

#### **Our views**

ECHAMP warmly welcomes the Opinion and the comprehensive work that has been carried out to develop the document. This comprehensive work can clearly be seen in the listing of the factors affecting equitable access to health services, i.e.

- Financial resources should be linked to health need;
- Services are affordable for everyone;
- Services are relevant, appropriate and cost-effective;
- Well-equipped facilities are within easy reach;
- There are enough health workers, with the right skills, in the right place;
- Quality medicines and medical devices are available at fair prices;
- People can use services when they need them;
- Services are acceptable to everyone.

ECHAMP responded to the consultation on the Opinion, highlighting a number of other factors as crucial elements of accessible and well-functioning health systems. These could be captured under three headings:

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

In our response we emphasized that individuals are increasingly vocal and determined to making their own choices. Currently, over a 150 million EU citizens make use of Homeopathic and Anthroposophic Medicinal Products (HAMPs) - both OTC and via prescribers - and this number is on the increase. Clearly, 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.

*2. Availability of the healthcare of choice*

Availability is one of the determinants of access to healthcare. In this context ECHAMP highlighted our 2013 report on the availability of homeopathic and anthroposophic medicinal products, which incorporates two reports of surveys carried out by PwC. Moreover, the Matrix Insight report on this topic, which was prepared at the request of the Commission and published in 2014, supports our conclusion that it is EU regulation that constitutes a serious bottle neck to sustainable availability. This is a serious issue which needs to be addressed by the Commission as well as the Member States.

*3. Contributing to sustainable health systems*

In our response we underlined that, apart from their positive impact on the health of individuals and patient satisfaction, HAMPs have advantages in relation to finances, both for the patients themselves as well as for Member States' troubled health budgets. In this respect we referred to a large scale survey, 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 Germany also showed a beneficial role of homeopathic and anthroposophic medical treatment in the long-term care of older adults.

*4. Integrative healthcare systems: a necessity for choice, safety and cost-effectiveness*

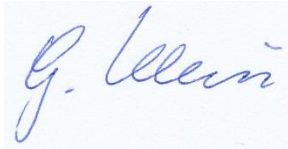
We stated that integration of care should take place between different levels of healthcare (primary care, hospital care, etc.) as well as between health and social care, particularly with regard to older people or people with chronic illnesses. ECHAMP maintains that healthcare systems should be based on the principle of 'Integrative healthcare', offering freedom of choice of healthcare, treatment and therapy, including homeopathy and anthroposophic medicine.

Unfortunately, the final Opinion has not taken over any of our suggestions. This surprising as it can be argued that the four points made by ECHAMP on HAMPs are equally valid for allopathic medicinal products - an important to patients.

Once again we would like to offer our expert knowledge to contribute to the debate on accessible and resilient health care systems as 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.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "G. Klein".

Gesine Klein  
President

A handwritten signature in blue ink, appearing to read "Mol".

Christiaan Mol  
Secretary General