

European Commission  
Health and Consumer Protection Directorate-General  
Health Services Consultation  
B232 8/102  
B-1049 Brussels  
Belgium

Brussels, 12 February 2007

***Re: Discussion Document for a Health Strategy***

Dear Director, Public Health,

Thank you very much for the opportunity to input into the above Discussion Document.

EuropaBio is the European Association for Bioindustries, representing 70 direct members operating worldwide, 12 associate members and 5 bioregions, as well as 24 national biotechnology associations representing some 1800 small and medium sized enterprises involved in research and development, testing, manufacturing and distribution of biotechnology products.

As a general overall comment, EuropaBio supports the effort being made to develop an overarching Health Strategy for the European Union and, in particular, for its citizens. We believe that the proposed focus set out in the Discussion Document is an appropriate one, and would only like to make the following comments:

- Where talking about supporting citizens and patients, including by making more healthy choices available and improving information to patients, we would like to see that the Commission ensures that legitimate patient organisations receive financial funding from the Commission. This will allow them to participate in the on-going healthcare policy and other relevant discussions, whilst becoming less dependant on other sources of funding.
- On a similar note, it is important that the High Level Pharmaceutical Forum's, as well as the Commission's drive to improve information to patients includes a solution that allows the healthcare biotechnology industry to actively contribute to this effort. This is because knowledge on the most advanced biotechnological medical therapies often sits only within biotech companies, due to the novel and complex approaches to disease management that these therapies offer.

- In seeking to help reduce health inequalities, and narrowing health gaps within and between countries, we believe that the Commission should publish, on a yearly basis, key healthcare indicators of the different EU member States. This would include, amongst others:
  - survival rates;
  - access to medicines in terms of time, level of funding coverage or reimbursement, and the way they are accessed (for example, whether they are accessed easily via hospitals, pharmacies etc); and
  - standard of care indicators.

Such data will allow for the development of quality of care overviews for Europe, which will, in turn, help to identify best practices and benchmark activities.

- In Subsection 4.1, "mental disease" is singled out as a priority challenge. We suggest that it would be better to list here the priority diseases for Europe, rather than singling out just one disease (without an indication as to why that disease was chosen).
- One important core issue that we believe is missing from the Discussion Document is that of prevention. As we move from a phenotype to a genotype approach to disease management, diagnostics will play a more and more vital role in ensuring a healthier Europe.
- The first paragraph of Subsection 4.2 refers to 'demographic change and ageing' as a field where health has a cross-sectoral impact. We would like to see low birth rates included in this field, as we believe these issues are related.
- For the sake of scope and responsibilities, we believe it would be helpful if the Commission clearly indicated which policy or other initiatives:
  - fall within its own competence;
  - are shared competencies with the Member States; or
  - fall outside its competence, but where the Commission wants to be a driver of ideas, national initiatives, bench-marker, etc.

- Finally, we believe that an EU health strategy should encompass a holistic approach covering all elements of healthcare and its stakeholders.

Thank you very much again for the opportunity to comment, and we look forward to being involved in the next stages of this process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Johan Vanhemelrijck', with a long, sweeping horizontal line extending to the right.

Johan Vanhemelrijck  
Secretary General