European Commission
Health and Consumer Protection Directorate-General
Health services consultation
B232 8/102
B-1049 Brussels
Belgium
31st January 2007

Re: Consultation Regarding Community Action on Health Services

To whom it may concern,

Pfizer welcomes the opportunity to input into this important consultation on developing a community framework for safe, high quality and efficient health services.

Pfizer is dedicated to better health and greater access to healthcare for people and their valued animals. Our purpose is helping people live longer, healthier, happier lives. Our route to that purpose is through discovering and developing breakthrough medicines; providing information on prevention, wellness, and treatment; consistent high-quality manufacturing of medicines, consumer products; and global leadership in corporate responsibility. Every day we help 38 million patients, employ more than 100,000 colleagues, utilize the skills of more than 12,000 medical researchers, and work in partnership with governments, individuals, and other payers for healthcare to treat and prevent illnesses—adding both years to life, and life to years.

This specific initiative on health services could not have come sooner. Systemic transparency around healthcare services and medicines is urgently needed as health systems and health policies become more and more interconnected.

There is evidently a clear need to improve legal certainty and address the wider application of European Court of Justice rulings regarding Treaty provisions on free movement of patients, professionals and health services.

Pfizer supports the Commission's view that European action can add value to Member States national action on health services. It will enable those responsible for health systems to have a clear framework of Community law within which to operate and take advantage of cooperation between health systems, where helpful, in providing safe, high quality and efficient health services.

Yours sincerely

Stuart Hurst
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Response to the Consultation regarding Community action on health services

Executive Summary

Pfizer welcomes the opportunity to comment on this important consultation on developing a community framework for safe, high quality and efficient health services. Systemic transparency around healthcare services and medicines is urgently needed at EU level as health systems and health policies become more and more interconnected.

Pfizer believes the addressing of the following points is essential to fulfilling the goals of the Commission's action plan:

- Information to patients is a cornerstone of any effective framework for health mobility. Given the nature of cross border healthcare, the means of ensuring the appropriate language of delivery to the patient should be considered. In order to enable the provision of adequate information, its delivery should be permitted from a broader variety of sources, including industry.
- EU action to improve the timely, effective and equal access to innovative medicines would significantly strengthen the efficiency and effectiveness of health services in Member States.
- More EU support is needed to support Member States in reducing long term health costs. Spend on health, including medicines, should be seen as a tool for keeping people productively healthy.

I. Pfizer Position

We have carefully considered all the questions asked in the Commission Communication and have sought to answer as many as possible and in particular whenever we felt we could usefully contribute. We have followed the order of the questions as asked by the Commission to structure our response.

Section 3.1 Legal Certainty

2. What specific legal clarification and what practical information is required by whom (e.g. authorities, purchasers, providers, patients) to enable safe, high quality and efficient cross border health care?

The provision of information to patients (ITP) is a cornerstone of any effective framework for health mobility. Access to, and provision of, information to patients on health resources, costs, providers, and treatment options including medicines are essential to safeguarding "safe, high-quality and efficient cross-border healthcare". Such information must be objective, reliable, comprehensive and comprehensible. Given the nature of cross-border healthcare, the ability to ensure the appropriate language of delivery to the patient is a key point. Legal clarity needs to be brought to bear on who is responsible for the provision of such information. The inconsistent interpretation of European legislation (Directive 2001/83/EC as amended) across Member States could have negative ramifications for patients travelling to receive medical treatment. The level of information provided should be a reflection of the medical needs associated with the procedure, rather than the level of information provided in the patient's home country.

In terms of delivery of information, only 50% of EU citizens have internet access (and significantly less in many Member States), and much existing online information is unverified and only in English. It is therefore important that the provision of such information should use a variety of measures that includes, but is not limited to, online information.

The increasingly limited healthcare resources in Europe and the challenges now faced here, such as the explosion in diabetes rates, means that multiple stakeholders, including the pharmaceutical industry, should be permitted to provide information to patients.

Section 3.2 Support to Member States

8. In what ways should European action help support the health systems of the Member States and the different actors within them? Are there areas not identified above?

3.2.2 Realising the potential of health innovation

With regard to EU support of the management of health innovation in the Member States, Pfizer supports the work of the European Commission's High Level Pharmaceutical Forum working group on Relative Effectiveness in its goals to establish common criteria with a view to establishing an evidence base at European level to help spread best practice, avoid duplication of resources and develop core information packages and techniques which can be used by Member States, to help them make best use of new technologies, therapies and techniques.

3.2.3 A shared evidence base for policy-making

EU action to improve the timely and effective access to innovative medicines would significantly strengthen the efficiency and effectiveness of health services in Member States. European patients should have faster access to new innovative therapies. Today, patients across Europe are not getting speedy and equal access to innovative medicines, essentially because of delays in pricing and reimbursement decisions, which take place at national level. Consequently, more than two years may elapse from the awarding of a marketing authorisation before a new medicine becomes available on some national markets. This is clearly unacceptable. The time needed for setting reimbursement prices

at national level must be shortened, in line with the time limits set by the Transparency directive. In addition, co-payment models and competitive generic prices should create headroom for financing innovative medicines. Access to innovative treatment is highly desirable, and the EU should work to seek access to high quality treatment for EU citizens. Europe is evolving – and it is no longer acceptable that glaring inequalities in access to treatment continue to exist within Europe's united continent. Europeans expect more.

Moreover, Member States' health services would be strengthened and more efficient if more EU support was provided to reduce long term health costs. Health is wealth. Attempts to contain costs in healthcare sometimes fail to recognise that good health underpins the economy. Economic gains result from well spent healthcare resources and access to high quality, modern medicines will help mitigate the future economic problems which Europe's aging population will create. Europeans need to challenge an entrenched point of view on healthcare – the view that this is a cost to government instead of an investment in people. For more than a decade, political debate has framed healthcare as an expense. A more far-sighted view would consider health spending as an investment in an economic engine. The reality of an ageing population requires Europe to think anew. There will be dramatic changes in the age structure of the EU which will be of great economic significance. Starting already from 2010, the working-age population (15 to 64) is projected to fall by 48 million (or 16 %) by 2050. In contrast, the elderly population aged 65+ will rise sharply, by 58 million (or 77 %) by 2050. The old-age dependency ratio is projected to double, reaching 51 % in 2050. Europe will go from having four people of working age for every elderly. [1]

Therefore, spend on health, including medicines – which can prevent serious (and expensive) conditions, and manage chronic conditions – should be seen as a tool for keeping people productively healthy. Medicines can add years to life and life to years. Healthcare systems across Europe are reluctant to pay for health, including innovative medicines that could not only extend life, but also improve a person's health throughout their life. Diet, exercise, and appropriate medical intervention for disease prevention can help maintain health, forestall disease, manage chronic conditions and allow seniors to contribute economically by remaining healthy and productive. Perhaps the best example of this benefit/cost tension is found in the treatment for cardiovascular disease – the largest killer in Europe. Further European support for healthcare systems which promote cardiovascular health through a comprehensive programme of diet, exercise and proper use of the best medicines to prevent illness from progressing would be a major step forward. Pfizer welcomes Council conclusions which have already been adopted for cardiovascular disease (in 2004) and Type 2 diabetes (in 2006). Such Conclusions should be viewed as the first step in creating more tangible EU action, in the form of Council Recommendations for major diseases, as part of the *acquis communautaire*, and well within the limits of Community competence.

3.2.4 Health systems impact assessment

Pfizer supports the ongoing work of the working group on Health Impact Assessment and Health Systems. A methodology to prospectively and systematically address the potential impacts of non-health policies on health systems is an essential tool in improving the quality of life of the European citizen and the sustainability of national health systems. We also welcome the involvement of stakeholders in this process and the assessment's continuous monitoring and evaluation of EU policies on health systems. Moreover, the "Health in All Policies" initiative by the Finnish Presidency will go a long way to ensuring that EU policies have a positive impact on health.

II. Conclusion

Pfizer believes that a Community action on health services is crucial to improving the quality of life of the European citizen and the sustainability of European health systems. We believe that it is essential all

[1] European Commission, "European Economy" Special Report No 1 (2006)

stakeholders are committed to working in partnership to ensure all EU citizens have access to safe, high quality and efficient health services.