



# Comments concerning “A reflection process for a new EU Health Strategy“ of David Byrne (European Commissioner for Health and Consumer Protection) 15/07/2004

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Strasbourg, 23 September 2004



Mr David Byrne  
Member of the European Commission  
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Strasbourg, 23 September 2004

Re: ECPM Comments on your Paper entitled “A reflection process for a new health strategy“ of 15 July 2004

Dear Mr Commissioner

In the name of ECPM, I want to express the great interest of our Council in the Document “Enabling Good Health for all – A Reflection process for a new EU Health Strategy”, and our sincere congratulations to the European Commission for this project showing a definit change of paradigm.

WHAT IS ECPM?

ECPM is a European Federation of Medical Doctors' Associations with more than 50,000 members practicing Alternatives and Complementary Medicines (CAM)

In addition to the 45 medical member associations (homeopathy, Chinese medicine and acupuncture, herbal medicine, naturopathy, neural therapy, manual medicines), it includes also as corresponding members two major european associations of patients using CAM and the european association of laboratories the producing homeopathic and anthroposophic medicinal products. All these associations are established in the various Member States of the EU.

The aim of ECPM is to promote plurality in medicine at EU level as well as in the different member states of EU.

In order to make pluralism become a reality, ECPM works to achieve the following objectives :

- To promote freedom of medical practices and the patients free choice.
- To ensure that European Laws and Regulations will guarantee freedom of medical practices and patients free choice.
- To communicate with EU Politicians and Representatives of Health Authorities and Agencies at international level on such matters.
- To make sure that medicinal products prescribed by CAM are available on the market.

- To participate in adequate evaluation of CAM medical practices and of CAM medicinal products therapeutic quality and effectiveness.
- To promote quality education and training for CAM practitioners.
- To make available to practitioners and patients all needed information to make well informed choices.

## KNOWLEDGEABLE PATIENTS MAKING RESPONSIBLE CHOICES

I am pleased to say that our Council most appreciated the basic principle on which the development of the new strategy will be based in the future, that is "Achieving good health for all means not just reacting to ill-health, but proactively promoting health, preventing diseases and helping people make healthy choices."

This idea is at the very heart of CAM practice.

About 40% of European patients choose CAM medicines because they have become aware of the need to be responsible of one's own health and have decided to take an active part in their own personal growth and in the prevention and treatment of diseases.

These patients have become conscious of the importance of lifestyle for health and know that there is a more global approach to health than merely curing diseases. They choose to use CAMs because they seek medical practices that go beyond the somatic body and consider as well soul and spirit. They use CAM medicines also because they want to avoid as much as possible undesirable side effects, for main CAM medication as well as for supporting medication of conventional medical treatments. We know that such patients, over the past ten years, have become aware through heavy media exposure of the iatrogenous effects of certain treatments.

In this regard, it is interesting to note that Drug testing and control Agencies in Europe, so far and to the best of our knowledge, have never reported on any accidents due to CAM medicinal products, which confirms their harmlessness.

More and more doctors throughout Europe attend CAM medical training courses (most of them provided by private institutions) because they feel the need to extend their "Art of healing", and have been convinced that human being's make up extends far beyond its more biomolecular existence.

## ECPM PROPOSAL FOR CAM PATIENTS PROTECTION

In your proposal, you recall that "The role of the EU is to protect citizens, foster synergies by fostering partnerships, maintaining health into all EU policies and inform citizens and health players". May we suggest that you include in your discussion paper the following information about European citizens who use CAMs and practitioners who prescribe them:

1. If it appropriate to allow European "Citizens to make right choices", then we must also allow them to choose CAMs freely. This is why we consider it essential that CAMs have official recognition within EU Official documents. In this connection, let us recall that the proposed Directive on "the status of non-conventional medicines in Europe" voted in 1997 by the European Parliament in Brussels was requiring the European Commission (Paul Lannoye Report) to pass legislation on this subject.
2. In your proposal, you have observed that "... gives the EU the role of setting quality and safety standard for medical products and devices."  
As we have said earlier, medicinal products used by CAM have only very few side effects.

It is therefore appropriate to use specific evaluation criteria suitable for these practices, instead of extreme standard evaluation criteria well adapted to conventional pharmacology with potentially dangerous side effects.

This is why it would be advisable to finance on a CAM specific budget clinical studies undertaken with the participation of experts experienced in such medicines. Indeed, only CAM experienced experts are able to provide adequate and competent advice regarding the use of such practices.

3. In order to ensure adequate patient protection, it is also advisable to guarantee CAM practitioners' competence. This is why we recommend that in the future, private training institutes be recognized officially and included as much as possible into official university medical curricula to make for effective transfer of consistent medical knowledge and practice to students and offer them full training if they wish.
4. If you want to "involve patients and citizens in policy making", it is advisable to call upon the 40% of European citizens who are currently CAM users and who wish its official recognition.
5. The low cost of CAM treatments is well consistent with your remark:  
 "Employing more expensive therapies when less expensive equally effective alternatives exist is a waste of taxpayers' money". From this point of view, it is extremely surprising that CAMs are excluded from Health Insurance refunding in several European countries, which is an unjust measure for CAM users, in particular for the poorest of them... Such policies prevent citizens from making therapeutic free choice which is a fundamental human right.
6. As we have said earlier, a special budget shall be allocated to CAM to promote further research in the field. Although this had been envisaged in the past (COST Action B4 - Unconventional medicine), there have been very few measures taken so far.

Moreover, recommendations in the Cost Action B4 underlined the need to establish an independent Healthcare Office with the participation of CAM experts.

The mission of this committee was to promote research in non-conventional medicine.

But the European Commission never followed up in this initiative.

7. You wish to cooperate with the WHO. We want to call your attention to the fact that WHO has been involved for several years in the publication of documents regarding CAMs: "Legal Status of Traditional and Complementary/Alternative Medicines" and "Guidelines for Consumers on Proper Use of Traditional Medicine and Complementary/Alternative Medicine" for example.
8. If the aim of EU's new health strategy is to help all citizens to discover a new health concept extending beyond the fight of disease, it is necessary to provide accurate and clear information regarding CAM practices. All CAM patients and practitioners associations will be delighted to take part in such effort.

We hope the above comments and suggestions will be of help to the European Institutions.

Please free to contact us for further information.

Looking forward to hearing from you.

Yours truly,

Dr Robert KEMPENICH, ECPM President





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