



On 8 December 2016, the CPME Executive Committee adopted the ' CPME Response to public consultation on European Pillar of Social Rights' (CPME 2016/105 FINAL)

CPME Response to public consultation on European Pillar of Social Rights

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU institutions and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.¹

CPME welcomes the opportunity to provide comments to the European Commission's plans to develop a European Pillar of Social Rights.

General remarks

CPME welcomes the confirmation that sustainable economic growth is not achievable without an equitable and inclusive foundation of social rights. CPME continuously underlines that health is a value in itself and must be safeguarded. In addition, CPME has long-since argued that there is a direct correlation between health and wealth. Defending and developing social rights, including health, is therefore equally important as ensuring economic and fiscal objectives such as those of the Stability and Growth Pact are met.

When it comes to health, responsible policy action is required both by the treaty's commitment to ensure that "[a] high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities", as set out in Article 168 (1) TFEU, and the addition that "[e]veryone has the right of access to preventive health care and the right to benefit from medical treatment under the conditions established by national laws and practices", confirmed in Article 35 of the Charter of Fundamental Rights in the EU. These provisions should therefore already be respected by EU institutions and Member States alike as "essential principles which should become common to participating Member States for the conduct of their employment and social policy."

Given that this is the explicit aim of the European Pillar of Social Rights, it follows that there is additional need to ensure EU institutions and Member States honour their obligations. The European

¹ CPME is registered in the Transparency Register with the ID number 9276943405-41.



Pillar of Social Rights would demonstrate added value if it can contribute to the real implementation of these objectives.

Health in the European Pillar of Social Rights

CPME promotes a ‘health in all policies’ approach to implement the objective of ensuring the best possible quality of health and that healthcare is accessible for every patient. It is not possible to view factors such as housing, education, conditions for employment and unemployment, equal opportunities and non-discrimination and access to social security and protection out of context, as they act as the social determinants of physical and mental health. The impact on and potential co-benefits to health should be taken into account in all of these policy areas.

With ‘Healthcare and sickness benefits’ having been identified as an area for action, CPME wishes to highlight the need to ensure that EU policies must be coherent in ensuring access to healthcare on an equitable, affordable and sustainable basis. In this context several factors must be highlighted:

- It is necessary to invest in the medical workforce to ensure the continued recruitment and retention of doctors and thus availability of care. Doctors must have the best possible education and training which can consequently translate to high quality healthcare. Similarly doctors must be afforded lawful and safe working conditions, with real opportunities for professional development and appropriate remuneration. EU-level initiative on health workforce planning as well as other relevant EU-level legislation must respect these criteria. On the specific issue of working time, CPME wishes to underline its support for the current *acquis* and calls for continued efforts for its full implementation.
- Within the bounds of EU competence, it is necessary to ensure that access is not obstructed by financial barriers at patient-level, such as co-payments or out-of-pocket payments, or at systemic level. CPME believes that patients have the right to healthcare and to receive the best treatment available, regardless socio-economic conditions². In relation to health technologies, it is necessary to ensure that transparency of pricing, authorisation procedures, and research priorities have the objective of ensuring equitable and safe access for patients based on robust health technology assessment.

Similarly, it is necessary to qualify the objective of providing cost-effective care:

- While CPME warmly welcomes the emphasis on the need to allocate more resources to disease prevention and health promotion, it is necessary to understand the quality of care and patient safety must always take precedence over cost-efficiency. CPME rather highlights the need to focus more on effectiveness, including in the choice of policy tools. There is a body of evidence available on the relative effectiveness of different policy options’ benefit to public health. It is necessary to ensure policy-makers at EU and national level follow this evidence-base. In

² [CPME policy on access to medicines and pharmaceutical pricing](#), adopted in November 2016



particularly in disease prevention, there is a need to ensure that i.a. agricultural policy, tax policy, regulation of advertising and marketing are coherent with public health objectives, to fully realise the potential gains.

On the basis of these observations, CPME asks the Commission:

- To ensure that any future development of the European Pillar of Social Rights has as its central objective the effective enforcement of EU citizens' rights, without making them conditional on their potential to serve economic targets.
- To clarify the objectives and work programme of the European Pillar of Social Rights, in particular the added value in the development of the initiative and its interrelation with on-going activities such as the European Semester, the State of Health in the EU, and health system performance assessment.
- To ensure direct stakeholder involvement in the continuation of the development of the European Pillar of Social Rights, including in the development of indicators and benchmarks, e.g. on access to healthcare, the effective burden of healthcare-related expenditure, as well as the evaluation of effectiveness of the mechanism.