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## **A European Health Data Space**

### **Comments on Roadmap-Inception Impact Assessment**

ECHAMP welcomes and supports this important initiative, which will be an essential cornerstone for the Pharmaceutical Strategy.

We are pleased to see that the proposal emphasizes the importance of allowing patients and citizens control over their own health data and of exploring how to facilitate the inclusion of citizen-generated data.

The further digitalisation of the healthcare sector will benefit all stakeholders by facilitating and enhancing appropriate research and innovation. Better access to health data will allow researchers and policy makers to understand the real use of and actual demand for different treatments and health services and to adapt policies and strategies accordingly. It is therefore important that the information gathered relates to both new and established treatments and medicinal products.

Traditional and complementary medicine is an important part of the health system in many countries and has an increasingly significant role to play alongside conventional medicine both in preventive strategies and in the treatment of disease to improve health outcomes (integrative approach). An accumulation of data on real world use of these treatments and medicines will allow their full potential to be explored and exploited, so as to maximise their contribution to reducing any unnecessary burden on health systems at a time when resources are already stretched.

A truly holistic, patient-centred, fit-for-purpose Pharmaceutical Strategy will combine the best of the established therapies with the new. The conscious integration of pluralism into the EU health and care system will ensure that patients and health professionals have access to a wide choice of reliable, high-quality medicinal products, including homeopathic and anthroposophic medicines. These elements need to be fully integrated into the development of an optimal health data space.



For example, our experience in accompanying the EMA, ISO IDMP substance, product, organisation and referential (SPOR) task force in the development of SPOR data management services has shown us how essential it is to ensure that all medicinal product types and all treatment options are included from the outset in the development of any relevant database. Standards developed need to allow for the specificities of each family of medicinal products to maximize the availability of data that can be used to facilitate and support patients with a broad choice of medicinal products.

We look forward to contributing to the on-line consultation from the perspective of integrative medicine.