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Survey on the Pharmaceutical Strategy - Timely patient access to affordable medicines

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Introduction

The EU strives to be a frontrunner in ensuring universal health coverage. In addition, it is a global leader in healthcare research and development and a major trading partner in pharmaceuticals and medical technologies. People across the EU expect to benefit from equal access to safe, state-of-the-art and affordable new and established therapies. Medicines play an important role in this regard, as they offer therapeutic options for diagnosis, treatment and prevention of diseases.

The unprecedented coronavirus pandemic (COVID-19) clearly demonstrates the need to modernise the way the EU ensures that its citizens get the medicines they need. Although this has been thrown into sharp relief by the coronavirus pandemic, it is not a new problem: even prior to the pandemic we witnessed shortages of essential medicines, such as cancer treatments, vaccines and antimicrobials. This calls for a thorough examination of how the supply chain - from the importing of active ingredients, raw materials, and medicines from third countries to internal EU production and distribution – can be made more secure and reliable.

Securing the supply of medicines is not only about existing therapies. There is also a need to ensure that the European pharmaceutical industry remains an innovator and world leader. Innovative technologies such as artificial intelligence as well as data collected from clinical experience ("real world data") have the potential to transform therapeutic approaches and the way medicines are developed, produced, authorised and placed on the market and used. Innovation needs to be focused on areas of most need.

At the same time, more must be done to ensure that innovative and promising therapies reach all patients who need them: at present, this is not the case, with patients in smaller markets being particularly affected. Health systems, which are also seeking to ensure their financial and fiscal sustainability, need new therapies that are clinically better than existing alternatives as well as cost effective.

Finally, we are more aware than ever of the need to reduce the environmental footprint of medicines.

All these challenges will be addressed in the forthcoming EU Pharmaceutical Strategy, which should cover the whole life-cycle of pharmaceutical products from scientific discovery to authorisation and patient access.

More information on the context of the initiative, on the challenges identified so far and on the objectives can be found in the roadmap (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12421-Pharmaceutical-Strategy-Timely-patient-access-to-affordable-medicines). Whether you are a concerned citizen or a professional in the area of medicines we would like you to let us know if you share our

objectives, what actions we should focus on and whether there are any additional aspects that we should cover.

After some introductory questions about yourself, the questionnaire continues with questions on the Pharmaceutical strategy.

When replying, please keep in mind that the questions in this survey were developed to address the long-standing issues identified in the EU pharmaceuticals system. These may be related to the problems arising from the coronavirus pandemic but are broader than that. The end of the survey includes dedicated questions on coronavirus related issues.

Please note that in this questionnaire, we do not intend to obtain data relating to identifiable persons. Therefore, in case you will describe a particular experience or situation, please do it in a way that will not allow linking to a particular individual, whether it is you or somebody else.

We thank you in advance for your time and input.

Latvian

Lithuanian

Portuguese

Maltese

Polish

About you	
*Language of my contribution	
Bulgarian	
Croatian	
Czech	
Danish	
Dutch	
English	
Estonian	
Finnish	
French	
Gaelic	
German	
Greek	
Hungarian	
Italian	

2

Romanian
Slovak
Slovenian
Spanish
Swedish
*I am giving my contribution as
Academic/research institution
Business association
Company/business organisation
Consumer organisation
EU citizen
Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)
Public authority
Trade union
Other
*Scope
International
Local
National
Regional
*Organisation name
255 character(s) maximum
Ministry of Public Health, Welfare and Sport
*Organisation size
Micro (1 to 9 employees)
Small (10 to 49 employees)
Medium (50 to 249 employees)
• Large (250 or more)

Transparency register number

255 character(s) maximum Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decisio making.
Which stakeholder group do you represent?
Individual member of the public
Patient or consumer organisation
Healthcare professional
Healthcare provider organisation (incl. Hospitals, pharmacies)
Healthcare pricing & reimbursement body and/or final payer
Centralised health goods procurement body
Health technology assessment body
Academic researcher
Research funder
Learned society
European research infrastructure
Other scientific organisation
Environmental organisation
Pharmaceuticals industry
Chemicals industry
Pharmaceuticals traders/wholesalers
Medical devices industry
Public authority (e.g. national ministries of health)
EU regulatory partner / EU institution
Non-EU regulator / non-EU body
Other (please specify)
Are you responding on behalf of a Small or Medium Sized Enterprise?
Yes
No
First name
Mirjam

*Surname

Heikens			

*Email (this won't be published)

m.heikens@minvws.nl			

*	Cou	ntrv	of	origir	ì
		,	•		•

Country of origin			
Please add your country of origin, o		Libyo	Saint Martin
Afghanistan	Djibouti	Libya	
Aland Islands	Dominica	Liechtenstein	Saint Pierre
			and Miquelon
Albania	Dominican	Lithuania	Saint Vincent
	Republic		and the
			Grenadines
Algeria	Ecuador	Luxembourg	Samoa
American	Egypt	Macau	San Marino
Samoa			
Andorra	El Salvador	Madagascar	São Tomé and
			Príncipe
Angola	Equatorial	Malawi	Saudi Arabia
	Guinea		
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and	Eswatini	Mali	Seychelles
Barbuda			
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	Marshall	Singapore
		Islands	
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	Solomon
			Islands
Bahamas	French Guiana	Mexico	Somalia

Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	French Southern and Antarctic Lands	Moldova	South Georgia and the South Sandwich Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar	Svalbard and
		/Burma	Jan Mayen
Bolivia	Grenada	Namibia	Sweden
Bonaire SaintEustatius andSaba	Guadeloupe	Nauru	Switzerland
Bosnia and Herzegovina	Guam	Nepal	Syria
Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian Ocean Territory	Guinea-Bissau	Nicaragua	Thailand
British Virgin Islands	Guyana	Niger	The Gambia
Brunei	Haiti	Nigeria	Timor-Leste
Bulgaria	Heard Island and McDonald Islands	Niue	Togo
Burkina Faso	Honduras	Norfolk Island	Tokelau
Burundi	Hong Kong	NorthernMariana Islands	Tonga

	Tobago
Cameroon Iceland North Macedonia	Tunisia
Canada India Norway	Turkey
Cape Verde Indonesia Oman	Turkmenistan
Cayman Islands Iran Pakistan	Turks and
	Caicos Islands
Central African Iraq Palau Republic	Tuvalu
Chad Ireland Palestine	Uganda
Chile Isle of Man Panama	Ukraine
China Israel Papua New	United Arab
Guinea	Emirates
Christmas Italy Paraguay	United
Island	Kingdom
Clipperton Jamaica Peru	United States
Cocos (Keeling) Japan Philippines	United States
Islands	Minor Outlying
	Islands
Colombia Jersey Pitcairn Islar	nds [©] Uruguay
Comoros Jordan Poland	US Virgin
	Islands
Congo Kazakhstan Portugal	Uzbekistan
Cook Islands Kenya Puerto Rico	Vanuatu
Costa Rica Kiribati Qatar	Vatican City
Côte d'Ivoire Kosovo Réunion	Venezuela
Croatia Kuwait Romania	Vietnam
Cuba Kyrgyzstan Russia	Wallis and
	Futuna
Curaçao Laos Rwanda	Western
	Sahara
Cyprus Latvia Saint	Yemen
Barthélemy	

Czechia	Lebanon		Saint Helena Ascension and Tristan da Cunha	Zambia
DemocraticRepublic of theCongo	Lesotho	0	Saint Kitts and Nevis	Zimbabwe
Denmark	Liberia	0	Saint Lucia	
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■ I agree with the per	sonal data protection	ı pro	<u>OVISIONS</u>	

International dependency and manufacturing

The EU is increasingly dependent on active ingredients originating from outside the EU. This has implications, including as regards increasing the risk of quality issues and shortages of medicines. The recent outbreak of COVID-19 shows that a disruption in the pharmaceutical products supply chain originating from outside the EU could present a major health security issue.

1. What type of EU action or initiative do you consider helpful to incentivise the production of active pharmaceutical ingredients for essential medicines (e.g. antibiotics, oncology medicines) in the EU?

800 character(s) maximum

Please consult the attached statement, namely the section on 'Discussing need and scope of medicines'
listings (p.4).

 2. What action do you consider most effective in enhancing the high quality of medicines in the EU? between 1 and 1 choices Stronger enforcement of the marketing authorisation holder responsibilities Increased official controls in the manufacturing and distribution chain Other (please specify) I don't know 			
Please elaborate your reply.			
500 character(s) maximum			
Increasing official controls in the manufacturing and distribution chain, through routine and unannounced inspections would help enhance medicines' quality.			
Access to affordable medicines			
A shortage of a medicine occurs when there are not enough medicines in a country to treat every patient with a given condition. Shortages can have a big impact on patients if their treatment is delayed because there is no alternative, or the alternative is not suited to their needs. 3. Are you concerned about medicines shortages in the EU? I am concerned I have no particular opinion			
I have no particular opinion			
If you wish, please elaborate your reply. 500 character(s) maximum			
Please consult the attached statement, namely the section on 'Addressing pharmaceutical chain vulnerability by diversifying sourcing and suppliers, building stocks and incentivizing production relocation to the EU' (p.6).			
4. Which actions do you think would have the biggest impact on reducing shortages			
in the EU?			
at most 3 choice(s) Stronger obligations on medicines producers, and other players in the supply chain to ensure medicines are available			

 Transparent information exchange among authorities on medicine stocks available in each country Increased cooperation among public authorities/national governments on shortages Multi-lingual packaging and electronic product information leaflets facilitating purchasing in different countries Providing incentives to companies to increase the production of medicines in the EU Inform on and make available to patients suitable substitutes for medicines that are at risk of shortage Other (please specify). 				
Please elaborate your roply				
Please elaborate your reply. 500 character(s) maximum				
Other: Increasing the availability of stocks within the pharmaceutical chain. The above actions require increased cooperation among EU Member States. Please see attachment, i.e. the section on 'Striving for equal access by securing supplyetc.', with a focus on: 'Gathering data and analyzing dependencies'; 'Tackling shortages collectively through'; 'Introducing multi-language packaging information'; 'Optimizing existing supply chains' (p. 6-7).				
Innovative medicines have to undergo a centralised EU-wide marketing authorisation. Companies often initially market them in a limited number of EU countries. It can take several years before patients in the other EU countries have access to those products.				
5. Do you think that companies that apply for and receive an EU-wide marketing				
authorisation should be required to make that product available in all EU countries?				
I agree				
I neither agree or disagree				
I disagree				
I don't know				
If you wish, please elaborate your reply.				
500 character(s) maximum				
Please consult the attached statement, namely the section on 'Addressing selective market introduction' (p. 9).				

In recent years, there has been an <u>increase</u> in the number of medicines withdrawn from the market upon decisions by the manufacturers.

6. Do you have an opinion on the reasons for these market withdrawals?
Yes
[™] No
If yes, please elaborate.
500 character(s) maximum
Please consult the attached statement, namely the section on 'Dealing with circumstances leading to market withdrawals' (p.9).
7. Are you aware of patients not receiving the medicine they need because of its price?
Yes
No
If you wish, please elaborate your reply. 500 character(s) maximum
Please consult the attached statement, namely the section on 'Facilitating debates on transparency of costs of research and development' (p.8).
8. Do you think that medicine prices are justified, taking into consideration the costs associated to their development and manufacturing? Yes
No
I don't know
If you wish, please elaborate your reply.
500 character(s) maximum
Please consult the attached statement, namely the section on 'Facilitating debates on transparency of costs of research and development' (p.8).

High prices for new medicines put pressure on public health spending. The costs for research and development are not publically disclosed and there is no agreement on how to calculate such costs. In certain cases, some EU countries join forces to increase their negotiating power when discussing prices with pharmaceutical companies. Individual pricing decisions in some EU countries may affect others. As an example, some EU countries limit the prices of medicines by linking that price to average prices in other EU countries (we call this "external reference pricing"- ERP). Because of ERP, a pricing decision in one EU country can inadvertently affect the prices in others. Once patents and other forms of market protection expire, generic and biosimilar medicines can enter the market and compete with the existing ones, this also typically brings down prices. Finally, there are plans to strengthen support to EU countries to work with each other on the clinical effectiveness of new medicines compared to existing alternatives, simply put how much better a medicine works compared to another one. This is part of the so called "health technology assessment "process."

9. What are the most effective ways the EU can help improve affordability of medicines for health systems?

at most 3 choice(s)

- Support the EU countries in better assessing and/or evaluating the value of medicines, meaning the effectiveness of a (new) medicine compared with existing ones
- Help EU countries share experiences and pool expertise on pricing and procurement methods
- Better coordination among EU countries to ensure that pricing decisions taken by one EU country do not lead to negative impacts on patient access in another EU country
- Facilitate, market entry and a healthy market functioning for generics and biosimilars
- More transparency on how the cost of a medicine relates to the cost of its research and development
- There should be a fair return on public investment when public funds were used to support the research and development of medicines
- I don't know
- Other

* Please explain.

100 character(s) maximum

EU+MS should discuss joint approach for greater transparency on R&D costs. See attachment (p.7-8).

Innovation in early development and authorisation

The European Commission actively supports health research and development through various funding mechanisms (e.g. Multiannual Financial Framework, Horizon 2020, Innovative Medicines Initiative partnership) and through collaborations between academia, healthcare systems and industry. Furthermore, the EU pharmaceutical legislation includes incentives to stimulate the development of innovative new medicines in areas such as paediatric and rare diseases; and market exclusivity rights to industry.

10. What actions at EU level do you consider most effective in supporting innovative research and development of medicines?

at most 3 choice(s)
Make the legislative framework more adaptive to new technologies and
advances in science
Provide more public funding for research
Support (including through funding) private-public partnerships
Support (including through funding) the creation of start-ups in medical research
Foster research collaboration between universities, research centres and industry
Provide research and development incentives in the form of intellectual property or market exclusivity rights for pharmaceutical companies investing in research
Simplify the requirements for the conduct of clinical trials
Other (please specify)
I don't know
Expected return on investment in research and development for the pharmaceutical industry depends als on the expected volume of sales; this seems to be one of the root causes of limited availability of certain medicines (e.g. medicines for rare diseases or medicines for children).
11. What do you consider are the most effective actions related to research and
development of medicines in areas where there are limited or no therapeutic
options (unmet needs)?
at most 3 choice(s)
Provide market protection (protect a new medicine from competition)
Provide intellectual property protection
Provide data protection (protection of the data related to a medicine's clinical trials)

V	Agree on a common understanding on what are the areas of unmet need in
	the EU
V	Funding more targeted research at EU level
	Funding more targeted research at national level
	Provide national schemes to support companies economically
	I don't know / no opinion
	Other (please specify)

The health sector is becoming more digitised, thanks to the increased availability and collection of health data from sources such as electronic health records, patient and disease registries and mobile apps (i.e. real world data) and through the use of artificial intelligence (AI) (i.e. systems that display intelligent behaviour and the use of complex algorithms and software in the analysis of complex health data). These developments, combined with real world data are transforming health, including the discovery of medicines.

12. Which **opportunities** do you see in digital technologies (such as artificial intelligence and use of real world data) for the development and use of medicines?

600 character(s) maximum

Some relevant opportunities:

- Personalized medicine Use of imaging, AI and machine learning to analyse data and support diagnostic and clinical decision-making Using sub-group analysis & prediction diagnostics (based on DNA-analysis).
- Use of real world data analysis to study medicines' safety, efficacy and effectiveness Within a registry project in the Netherlands, national disease registries are being established. The aim is to encourage shared decision making, and HTA (re-)evaluation.
- Support, sustain and stimulate patient adherence to therapy using technology.

13. Which **risks** do you see in digital technologies (such as artificial intelligence and use of real world data) for the development and use of medicines?

600 character(s) maximum

Once the opportunities for the use of digital technologies in the context of medicinal products have been identified by the European Commission and the Member States, it would also be important to discuss their associated risks.

Continuous manufacturing, advanced process analytics and control, 3D printing and portable/modular systems, may revolutionise the way medicines are manufactured.

14. Are you aware of any obstacles in the EU in taking advantage of technological progress in the manufacturing of medicines?

[◎] No

I don't know

If yes, could you please specify.

500 character(s) maximum

Please consult the attached statement, namely the section on 'Adapting the legislative framework to respond to digital, scientific and technological advances' (p.4).

<u>Clinical trials</u> are investigations in humans to discover if a new medicine is safe and effective. Clinical trials can also be used to test if a new treatment is more effective and/or safer than the standard treatment. Finally, so called "pragmatic clinical trials" can be conducted to compare the safety and effectiveness of different standard treatments in real world setting.

15. How could clinical trials in the EU be driven more by patients' needs while keeping them robust, relevant and safe for participants?

at most 3 choice(s)

- By providing more national support for the conduct of so-called "pragmatic trials" with the aim to optimise treatment to patients
- By better coordination for larger trials comparing different treatment strategies (covering medicines and other treatments such as surgery, radiotherapy, physiotherapy)
- By providing support for non-commercial organisations to conduct clinical trials in fields where financial interest is weaker
- By involving patients' experiences in early phases of medicine design (e.g. factor-in how the disease affects their lives and develop medicines to target symptoms that are particularly important to patients)
- By designing more trials that collect information on medicine tolerability or the impact of a treatment on the quality of life
- By taking into consideration during the design of a trial the burden of trial participation on patients' life
- Other (please specify).

Please elaborate your reply.

100 character(s) maximum

Clinical trials, incl. pragmatic CTs, should have sufficient participants to have statistical power.	
Certain medicines are developed based on genes, cells or tissue engineering. Some of these products a developed in hospitals. These are covered by the notion of advanced therapy medicines.	re
16. Is the current legal framework suitable to support the development of cell-bas	ed
advanced therapy medicines in hospitals?	
I strongly agree	
I partially agree	
I disagree	
I don't know	
* If you responded partially agree or disagree, please provide examples of changes that, in your view, would be required to support the development of these product 500 character(s) maximum	
Please consult the attached statement, namely the section on 'Promoting dialogue on Advanced Therapy Medicinal Products and reviewing their legal framework' (p.5).	
Environmental sustainability of medicines and health challenges	
Residues of several medicines have been found in surface and ground waters, soils and animal tissues across the Union. As of yet, no clear link has been established between medicine residues present in the	9
environment and direct impacts on human health. However, the issue cannot be ignored and there is a need for a precautionary approach.	
environment and direct impacts on human health. However, the issue cannot be ignored and there is a need for a precautionary approach.	'e
environment and direct impacts on human health. However, the issue cannot be ignored and there is a need for a precautionary approach. 17. What actions at EU level do you consider most effective in limiting the negative	'e
environment and direct impacts on human health. However, the issue cannot be ignored and there is a need for a precautionary approach.	'e

Enhanced application of the polluter pays principle

Review the way the Environment Risk Assessment of a medicine is

conducted and its consequences on the authorisation process

Clear labelling of environmental risks to allow informed choices among equivalent therapeutic options
Reference to environmental risks in advertising for over-the-counter
medicines
Make medicines known to pose an environmental risk available by
prescription only
Strict disposal rules for unused medicines
Prescribe medicines only when it is absolutely necessary (more prudent use)
■ Medicines dispensed to patients in the quantity actually needed (e.g. number
of pills, volume of solution)
Enhanced wastewater treatment if certain residues could be better removed
Other (please specify)
ease elaborate your reply.
100 character(s) maximum
Transparency on environmental risks for water sector, patients and health care professionals.

Antimicrobial resistance (AMR) is the ability of microorganisms (such as bacteria, viruses, fungi or parasites) to survive and grow in the presence of medicines. It reduces progressively the effectiveness of antimicrobials and is caused, among other things, by extensive and improper use of antimicrobial medicines. Antimicrobials include antibiotics, which are substances that fight bacterial infections. AMR can lead to problems such as difficulties to control infections, prolonged hospital stays, increased economic and social costs, and higher risk of disease spreading. AMR is one of the most serious and urgent public health concerns.

18. Which actions do you think would have the biggest impact on fighting AMR concerning the use of medicines for patients?

at most 3 choice(s)

Ρ

- More prudent use of antimicrobials (if necessary through restrictions on prescriptions)
- Improve the treatment of wastewater and/or manure to lower the levels of antimicrobials
- Raise citizens' and healthcare practitioners' awareness by informing them on appropriate use of antimicrobials and the correct disposal of unused medicines

 Introduce an obligation to use diagnostic tests before prescribing antimicrobials, for example to verify whether it is a bacterial infection before prescribing antibiotics and to define the most adequate antibiotic Public finance research and innovation on new antimicrobials, their alternatives and diagnostics Encourage public health campaigns that prevent infection through better general health including increased immunity Encourage public health campaigns that prevent infection through the use of vaccines Encourage better hygiene measures in hospitals Other (please specify) I don't know 			
Innovation in antimicrobials is limited. For example, no new classes of antibiotics have been discovered for decades. Restricting the use of antibiotics to minimise the risk of developing resistance is a commercial disincentive for investment, as potential investors are concerned that their investment will not be profitable.			
 19. Where, in your view, should the EU focus its support for the creation of new antimicrobials or their alternatives? at most 2 choice(s) Support academia for researching/discovering new antimicrobials or their alternatives ✓ Support industry for developing new antimicrobials or their alternatives Provide specific support to small and medium-sized enterprises (SMEs) Other (please specify) I don't know 			
Health threats such as the coronavirus disease test the limits of public health systems, the pharmaceutical industry and of the pharmaceutical legislation. From the beginning of the coronavirus (COVID-19) pandemic, the EU has taken measures to coordinate a <u>response</u> , which includes actions ensuring the availability of medicines.			
20. How has the coronavirus (COVID-19) pandemic affected you in relation to			
access to medicines and treatments?			
600 character(s) maximum			
Please consult the attached statement, namely the section on 'Taking stock on lessons learnt from the Coronavirus (COVID-19) Pandemic' (p.11).			

21. In your opinion and based on your experience, what can the EU do to prepare for and manage such a situation better in the future in relation to pharmaceuticals?

600 character(s) maximum

The European consultation and coordination structures should be operational, clear and efficient so that Member States are aware and able to foresee upcoming initiatives, both at national and European level. In doing so, cohesion among Member States is enhanced and the risk of unilateral decisions minimized. Overlap of activities creates extra burdens on the system. More oversight and transparency for actions at European level would be welcomed. Likewise, greater coherence and coordination among the various structures at the EU level would be helpful.

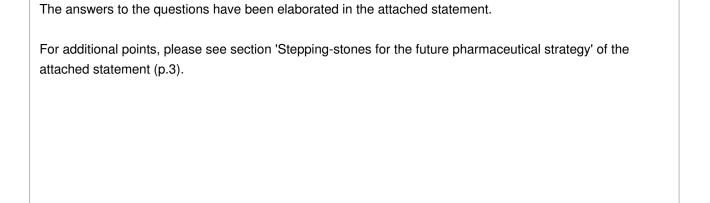
Summary question

22. While the Commission is working on improving the EU pharmaceuticals framework, which areas of work do you find most urgent?

t mo	ost 3 cnoice(s)
1	Improve patients' access to medicines
1	Reduce shortages
	Help national authorities ensure affordability for patients and increase health
	systems sustainability
	Support innovation for unmet needs
	Use of digitalisation to develop medicines
	Help reduce anti-microbial resistance
	Reduce the dependency on essential active ingredients and medicines
	produced outside the EU
	Environmental sustainability of medicines
	I don't know
	Other (please specify)

- 23. If you were asked before the coronavirus (COVID-19) pandemic, would you have responded differently to any of the previous questions?
 - Yes
 - No
 - I don't know
- 24. Is there anything else you would like to add that has not been covered in this consultation?

900 character(s) maximum



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Contact

EU-PHARMACEUTICAL-STRATEGY@EC.EUROPA.EU