

FINNISH DIABETES ASSOCIATION
4.4.2008

The Commission of the European Communities
CONSULTATION RESPONSE 'Legal proposal on Information to Patients'

The purpose of the 'Information to Patients' proposal is to ensure good quality, objective and reliable, non promotional information on prescription only medicinal products and to harmonise the existing situation in Member States. Both of the purposes should be regarded as principal guidelines in future development. Patients should have access to the medicinal information that meets the requirements they have. Unfortunately EU-citizens have unequal access to medicinal information.

Finnish Diabetes Association's central item of concern is to **ensure biased evidence based information to patients**. Finnish Diabetes Association regards that medicinal industry does not come in the question as an agent of credible information distributor here. Prescription medicines are not like other consumer goods. The main source of **medicinal information should be medicinal administrative actors without commercial interest or engagements to industry** not forgetting medicinal professionals treating patients.

In Finland citizens are provided with evidence based neutral medicinal information in several ways by administrative authorities. Medicinal information is provided in **national current care guidelines** (Käypä hoito –suositukset) which are often produced in co-operation with patient organisations. For instance current care guideline of Diabetes, which was published this month, was presented to be made by Finnish Diabetes Association and our association had a chance to give comments on the work while it was in process.

The Finnish Medical Society Duodecim along with Sitra, the Finnish Innovation Fund, has published this year a nationwide portal-service on understandable, unbiased, neutral and evidence based medicinal information open to general public in the form of **electronical database called Terveyskirjasto ("Health Library")**. It includes both clinical and medical information on diseases. We would kindly ask this link www.terveyskirjasto.fi to be added to the chapter concerning Finland.

Patients are freely able to look up **information about the price and reimbursements of medicines**, clinical nutrients and emollients marketed in Finland, and find out which generic equivalents are available for them. This is possible in internet database on the pages of The Social Insurance Institution of Finland (Kela). (http://asiakas.kela.fi/laakekys_app/LaakekysApplication?kieli=en).

National Agency for Medicines has a **full directory of medicinal product information ('NamWeb')** which is open to all public. NamWeb is a free search service that enables you to look for information on medicinal products intended for human or veterinary use in Finland. The service covers **all medicinal products with a valid marketing authorisation as well as those products for which the marketing authorisation has been withdrawn and are no longer on the market**. (Link: <http://namweb.nam.fi/namweb/do/haku/view?locale=en>)

Finnish Diabetes Association would like to suggest following **EU-level attempts**. To advance biased provision to patient information on prescription only medicines on EU-level would be care for the role of **EMEA** as a central and neutral source of medicinal information. A welcome innovation would be **EU-wide "Health Library"** consisting information of all EMEA proved medicines translated to all EU-languages, where all member nations' medicinal authorities could

add extra information that local authorities have validated. Commission could **improve awareness** of existing EU-level internet pages and their mutual synergy (for instance the **pages of EMEA and EU health portal** are not very easy to find by a normal grass root level search in internet). As well **information initiatives** concerning EU-level health promotion and prevention programmes on national and local level should be strongly supported.

Safeguarding and promoting public health should be a priority in EU. As a conclusion Finnish Diabetes Association would like to suggest the **owner- and leadership of this subject should be transferred under DG SANCO, which is responsible for health protection and promotion in EU.**

Finnish Diabetes Association would also like to refer to the **EPHA consultation response** to Legal proposal on Information to Patients as a base for future preparatory work.

With kind regards,

Riitta Koivuneva
Expert on Social and Health Policy Affairs
Finnish Diabetes Association

Jorma Huttunen
Managing Director
Finnish Diabetes Association