



To: Commissioner Stella Kyriakides, Commissioner for Health and Food Safety

Giorgos Rossides, Head of Cabinet, Commissioner Stella Kyriakides
Michael Hager, Head of Cabinet, Executive Vice-President Valdis Dombrovskis

CC: Patricia Reilly, Head of Cabinet, Commissioner Mairead McGuinness
Valeria Miceli, Policy coordinator financial services, President von der Leyen cabinet

Subject: Insurance Europe's letter on the EHDS

Brussels, 2 October 2023

Dear Commissioner Kyriakides,

I am writing to you on behalf of Insurance Europe, the European insurance and reinsurance federation, in relation to the exclusion of the insurance sector during the drafting of the EU Health Data Space (EHDS) proposal. It is with deep concern and disappointment that we bring to your attention the matter of our industry being excluded from the provisions on secondary use of health data without proper impact assessment.

We welcome the European Commission's effort to establish an EHDS, as it has the potential to support more effective healthcare delivery and facilitate the development of innovative treatment and services. However, we regret that the Commission decided to exclude insurers from the secondary use of health data without providing a clear explanation in its impact assessment and without giving our industry the opportunity to explain the far-reaching impact of this broad exclusion during the drafting of the text. Greater availability of anonymised data can enable insurers to offer more affordable rates, new innovative services focusing on risk prevention and mitigation, and offer insurance for risks that were previously uninsurable, due to information gaps that today can be filled in by the increased availability of data. This can lead not only to improved access to care, but also to increased efficiency and cost savings for the entire healthcare system.

The Commission's decision to include premium setting in the black list of purposes for secondary use contradicts the objective of the EHDS proposal which aims to unlock the potential of unused health data to open up new opportunities for innovative health services and improved patient outcomes.

It furthermore contradicts the European Commission's Beating Cancer Plan which recognizes the need that insurers' risk-based assessment practices reflect the latest developments in cancer treatments and their improved effectiveness.

The European Commission's approach in which insurers are seemingly perceived only as a risk, overlooking the beneficial contribution our sector provides in the health space, can potentially negatively affect the coverage of health risks. It is thus essential that the European Commission includes the insurance industry in its impact assessment and fully considers our sector's role in bringing benefits to consumers and society more broadly. We firmly believe that the success of any policy lies in its inclusivity, wherein all affected parties are given an equal opportunity to voice their concerns, provide insights, and offer solutions.



We stand ready to engage in a constructive dialogue with DG SANTE, to ensure that policies are prepared with a good understanding of our industry's added value and role.

I remain at your disposal for any questions or clarifications you may need.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "O. Kette". The signature is written in a cursive style with a large initial "O" and a period.

Andreas Brandstetter
President
Insurance Europe