

European Commission
DG SANTE, Digital Health
European Reference Networks, (Unit B.3)

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Feedback to the Combined Roadmap/Inception Impact Assessment for the European Health Data Space

The Danish Chamber of Commerce have received the request for response to the roadmap/Inception Impact Assessment for the European Health Data Space.

The Danish Chamber of Commerce represents more than 17.000 member associations and 100 industry organizations. In this context we represent specifically Danish healthcare providers, including pharmaceutical companies, MedTech companies, digital providers, social services providers, etc.

First of all, The Danish Chamber of Commerce would like to thank the European Commission for the opportunity to provide feedback to the roadmap and Inception Impact Assessment on the European Health Data Space.

Overall, The Danish Chamber of Commerce supports the initiative taken by the EU Commission in the data strategy from February 2020. A more data driven digital economy has great potential for economic growth in the Union and increased use of data can create new avenues for how to transform challenges into opportunities. Here the challenge is a health sector, which is under pressure and the opportunity is better use of health data to improve treatment and prevention of disease.

Therefore, The Danish Chamber of Commerce welcomes this initiative and generally approve of the ambition to establish a Health Data Space which should facilitate better exchange and use of anonymized health data across the EU. It is important that it is designed as a tool for many stakeholders and not only public authorities.

We are pleased that the initiative addresses several of our ambitions for digital transformation of healthcare and data including:

- That health data should be collected and used in a better and more systematic way
- That the access to data for research purposes should be improved, and
- That the infrastructure for self-collected data by the citizens should be improved.

For us, the future of healthcare means access to data for relevant professionals, enabling healthcare systems across sectors and providers (public and private) to provide the best service to the citizen. What is central, however, is the regard to confidentiality, consent and safety for the citizens. A healthcare system which takes into account these things will be able to provide efficient and structured healthcare services which is ultimately to the benefit of the patients.

The COVID19 crisis has only stressed the need for digital transformation of the healthcare system and the value of digital solutions.

Health data should be collected and used in a much more structured way to ensure a standardized approach so data can be used across sectors and borders. Data can be a valuable tool in assessing which efforts adds value and which do not. In Denmark we have collected extensive amounts of data for many years, but we lack a better and easier access to data, e.g. for research purposes (of course always in an anonymous form). We must find a balance between utilizing the great value that data holds without ever compromising the important principles of safety and trust.

Data today is difficult to access for public and private researchers alike. A better overview of available data as well as easier access would improve the possibility to utilize the data available.

Also, there is a lack of appreciation for the public benefit from commercial use of health data. Innovative capabilities lie in great quantity with European companies both larger firms and SME's. New MedTech products etc. can greatly improve the treatment opportunities and effectiveness of medicine. On that note, the EHDS should strive to also make health data available for commercial purposes.

Collection of data should also be improved, not least from the citizens own wearables and apps.

We look forward to contributing to the further development of this initiative from the perspective of the Danish businesses and private healthcare providers.

The Danish Chamber of Commerce is of course available for discussions and elaborations of this response.