

**ESIP Feedback to the**  
**Call for Evidence**  
**On the upcoming European Life Sciences Strategy**  
**16-04-2025**

The narrative around the future of life sciences emphasises competitiveness, EU strategic autonomy and the economic potential of the pharmaceutical sector. As representatives of social and health insurers, the European Social Insurance Platform (ESIP) supports a dynamic and competitive life sciences sector, provided that public health remains the central focus of any future initiatives related to health. The strategy for European life sciences (henceforth: the strategy) must place the needs of patients, the affordability of pharmaceutical products and the long-term sustainability of healthcare systems above market dynamics.

### **Balancing Incentives with Conditionalities**

It is crucial to strike a balance between creating attractive incentives for the life sciences sector and imposing the necessary conditionalities to ensure the safety, efficacy, clinical and cost-effectiveness, affordability and sustainability of pharmaceutical products. Importantly, policymakers should engage in **consultations with competent authorities**, such as national health insurance bodies, to ensure that **incentives are aligned with public health priorities and societal needs**.

### **A Coordinated and Sound Legal Framework for Pharmaceuticals**

The strategy should be coordinated and aligned with ongoing legislative initiatives in the field of pharmaceuticals, particularly the **Critical Medicines Act** and the **revision of the EU general pharmaceutical legislation**, to ensure that **policy objectives and incentives are balanced, complementary and adequately targeted**.

The strategy's scope and objectives should be clearly defined, with particular attention to the categories of products targeted. In the field of pharmaceuticals, existing horizon-scanning initiatives could help forecast the next generation of life sciences-based innovations.

Any future legislative initiative included in the strategy should be subject to **rigorous and comprehensive impact assessments**, not only with respect to industrial competitiveness but also to their economic consequences on healthcare systems. Efforts to enhance the competitiveness of the pharmaceutical sector must not undermine the financial viability of European health systems nor lead to an unsustainable cost burden for patients and taxpayers.

Legislative changes within this framework should complement, not undermine, national competences.

## Ensuring Rigorous Standards for Innovation

The push to accelerate the development of life sciences-based innovations should not be used as a justification to relax regulatory requirements for clinical trials, efficacy standards or clinical effectiveness evaluations. Accelerated approval pathways are viewed with caution, as they carry the risk of weakening evidentiary standards for health technology assessment (HTA), the subsequent pricing and reimbursement negotiations, ultimately affecting patient safety and access to essential treatments.

We strongly advocate for the maintenance of **rigorous regulatory requirements for pharmaceuticals**, even in the context of expedited approval processes. Any attempt to accelerate their development and uptake must not compromise the thoroughness and quality of evidence required to demonstrate the safety, efficacy and effectiveness of treatments.

## Addressing Skills Shortages

Lastly, **we welcome the intention to address the skills shortages and brain drain** affecting the European life sciences sector. The capacity to nurture a skilled workforce and promote attractive working conditions in the life sciences ecosystem will be central to maintaining both a thriving economy and a healthy society.

In conclusion, ESIP supports a life sciences strategy that balances the promotion of industry competitiveness with the broader goals of public health, affordability and sustainability. The strategy should always prioritise the well-being of European citizens, ensuring access to safe, effective and affordable healthcare, while supporting innovation that aligns with societal needs.

