

**From:** [REDACTED] (CAB-KYRIAKIDES)  
**To:** [REDACTED]; HERBOUT-BORCZAK Karolina (CAB-KYRIAKIDES)  
**Cc:** [REDACTED] (CAB-KYRIAKIDES); [REDACTED]  
**Subject:** RE: DIGITALEUROPE position on the EHDS  
**Date:** vendredi 16 octobre 2020 18:52:18  
**Attachments:** [image003.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.jpg](#)

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Dear [REDACTED],

Thank you very much for your message and for sharing your position paper with us.

Your support on the path towards the European Health Data Space is appreciated.

All the best,

[REDACTED]

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**From:** [REDACTED]@digitaleurope.org>  
**Sent:** Wednesday, October 14, 2020 11:18 AM  
**To:** [REDACTED] (CAB-KYRIAKIDES) [REDACTED]@ec.europa.eu>; HERBOUT-BORCZAK Karolina (CAB-KYRIAKIDES) [REDACTED]@ec.europa.eu>  
**Cc:** [REDACTED]@ec.europa.eu>; [REDACTED]@digitaleurope.org>; [REDACTED]@digitaleurope.org>; [REDACTED]@digitaleurope.org>  
**Subject:** DIGITALEUROPE position on the EHDS

Dear [REDACTED], thank you for taking the time to speak with us the other day. During our discussion I had mentioned that we are finalising DIGITALEUROPE's newest position paper primarily on the EHDS with the industry's (+pharma) agreed recommendations.

We aim to announce the paper in a few weeks which will include using our 40 National Trade Associations in the Member States. We had hoped to publish alongside the data space announcement this week but appears that will be pushed out to the 11 November which appears to coincide with a Communication from Commissioner Shinas on '*Building a European Health Union: preparedness and resilience*'.

The key recommendations of the paper are below. We also touch on the MFF and the RRF and included in our annex an acknowledgement of the NHS Health and Social Care Risk Framework for data transfer to the cloud as a good model for a common data classification framework.

We understand that some of our recommendations will be challenging to implement. Our industry is aligned with your goals and we are ready to help in any way. Please let me know if you have any questions. (FYI – please note we have also mailed your services at CNCT and SANTE)

☐ A framework of trust and legal clarity

- Harmonise the mechanisms by which personal health information can be shared (e.g. a common approach to pseudonymisation and/or anonymisation) in the EU

- Establish a consistent harmonised model for a central health data authority in each Member State to facilitate the processing of the secondary use of health data for both the private and public research institutions
- Build on responsible data sharing initiatives driven by industry, like YODA,<sup>[1]</sup> and guarantee private sector participation in the Data Space, while safeguarding Intellectual Property Rights

☐ Interoperability and standardisation



- Advance federated data models
- Foster convergence and acceleration of deployment of Health IT (HIT) interoperability standards such as Fast Healthcare Interoperability Resources (FHIR) building on the Commission Recommendation on a European Electronic Health Record exchange format<sup>[2]</sup>
- Define a common EU health data classification to help organisations categorise identifiable, anonymised and pseudonymised data
- Confirm appropriate encryption tools and security standards that should be used to process sensitive health data

☐ Increase the potential of digital through investments and ambition

- Use Next Generation (Recovery and Resilience Facility) funds and the next Multi-Annual Financial Framework (MFF) to radically upgrade the digital capabilities of health systems, including cloud technology, as a secure and economic infrastructure for driving digital transformation

Kind regards



Digital Transformation   
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<sup>[1]</sup> YODA stands for Yale Open Data Access (YODA) Project. More info [here](#)

<sup>[2]</sup>

Accessible [here](#)