

13.10.2004

Commissioner
Mr. David Byrne
European Commission

Ref. Reflection process for a new EU Health Strategy - Enabling Good Health for all

Dear Commissioner Byrne,

According to the view of the National Research Centre for Welfare and Health, STAKES, it is of utmost importance that the European Union strengthens its role and activities in the field of public health. The time is right for promoting health in all European policies. To make this possible, a thorough analysis and discussion in and between all member states is necessary. STAKES congratulates the European Commission and Commissioner David Byrne for facilitating this discussion by delivering a reflection document to a wide consultation process.

STAKES thanks for the possibility to contribute to the reflection process. As key comments, seven themes are highlighted.

1) An open dialogue is a value as such, ensuring wide use of expertise in creating the strategy and commitment in implementing it. When creating Public Health policies, however, the open discussion should not be seen as a balancing act between numerous equally important "stakeholders". It is self-evident that policies designed in partnership with e.g. industrial organisations differs significantly from those where public health and health promotion actors have played the key role.

The national bodies responsible for health policy formation are the party to ensure compatibility of European and national choices. In addition to them, public health and health promotion organisations are among the key owners of the strategy, being largely responsible for the implementation. In the end, health policies have to be grounded on democratic accountability of Member States to their citizens.

Although a successful strategy affects policy formation in a number of fields, health sector has to bear the major responsibility for ensuring coherence and sustainability from the public health perspective. In a public health strategy, other interests - for example, goals of industrial or trade policies - can not override the arguments for health.

2) It is important that the reflection document pinpoints that health and health policy can be investments also in the economic sense of the concept. This, however, should not be seen as the only or ultimate argument for better public health. In a general

perspective, the economic system is also there to produce health and well-being to the populations. Justification of promoting public health with its beneficial effect on economy changes the places of the primary goal and the instrumental goal. This is not beneficial, since a requirement to show positive economic net effect of health policies and policy measures would limit the operating area of public health strategy to an all too narrow arena.

Even if many policies of the European Union are geared for economic growth - and must be so - the public health strategy should fully recognise the overriding nature of health and well-being as ultimate goals.

3) The "*sine qua non*" of the reflection document is mainstreaming health into all EU policies, a strategic choice the importance of which can not be overestimated or over-emphasized. This necessary strand should be strengthened when elaborating the strategy further. Already now enough is known on health implications of a considerable number of policy options, and there are methods (like Health Impact Assessment) to further strengthen the evidence base to the policies. Now the true challenge is to change this knowledge into actual policy decisions - concrete steps need to be taken to change structures and processes that harm health of the Europeans.

If European Union should fail in ensuring enhancement of health through its own decisions across the policy fields, the credibility of specific health initiatives would be seriously undermined.

4) It is laudable that the reflection document takes a clear position regarding a stronger role of the European Union in the international health arena of the future. It is in the interests of the Union to prevent that international agreements do not jeopardize health of the people in less developed countries. However, consequences of international trade treaties may be problematic also for national health care systems in Europe. Therefore, a public health strategy must be geared to prevent any unjustified or harmful limitations to national governments to exercise active health and health care policies.

5) The determination to increase resources for implementation of the Public Health programme, as indicated in the document, is necessary. One important way to do this is to build up European public health research capacity. When elaborating the strategy further, research policy should be given an even more thorough consideration. Both a possible European National Institute of Health, and the seventh frame programme for research have to ensure a basis for a decisive strengthening of applied research, directly supporting public health policies. In the context of research and analysis it is also important to ensure a better coordination and organisation of the existing public health information and knowledge system within the EU as well as the contribution of the forthcoming Centre for Disease Prevention and Control to health monitoring activities within EU.

6) Health is unevenly distributed inside the European nations. Moreover, the recent enlargement of the Union has created a situation where health status differences between the member nations are larger than before. Therefore, major health improvements may be ensured through interventions aimed at supporting those whose

material resources are limited, both targeted inside member states and to those member states with greatest difficulties.

The ability of the health care to alleviate disproportional distribution of bad health among the poor must be strengthened. In health care reforms, it is necessary that access of the poorest to the services is not endangered.

7) Mental health problems are among the very largest threats to the health of the peoples of Europe. In addition to the human suffering caused to the individuals, loss of production due to long-term mental health problems is immense.

Mental health is an inherent part of all health. However, this is not always remembered by all policy makers and other relevant actors. Therefore, the huge challenge of promoting mental health must be explicitly pinpointed in the new European health strategy. Stronger multisectoral policies and programmes promoting mental health have to be more actively created and made visible in the future. As assessed by STAKES, making mental health a central issue of the next European health strategy is not only well grounded, but necessary.

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