Dear colleagues,

On behalf of Lara Garrido-Herrero, Secretary General of EPHA, please find attached EPHA's response to the EU Health Strategy.

Thank you again for giving us the opportunity to enjoy a one week extension to the deadline.

Please find below a short summary of the response for your convenience.

The EPHA response aims to complement EPHA members’ responses by setting out guidelines and broader principles of action for the Health Strategy. We do not go into the details of each policy priority as we consider EPHA members expertise to be the best source of information and recommendations.

EPHA considers that the success of the EU Health Strategy will depend on the following key factors:

- **Adopting a public health approach to health:** We advocate for a *health in all policies* approach as the main mechanism through which the strategy will be delivered: investing in health policies alone cannot deliver the objectives of the Strategy.

- **Stating clearly the objectives of the Strategy:** The EU Health Strategy should aim to bridge the gap between health inequalities – both within and between Member States – within a ten year period. To achieve that aim, the main focus should be on broader health determinants.

- **Adopting a pragmatic approach to the Strategy taking into account resource limitations:** EPHA understands that the EU competences on health are imited and therefore the Strategy will be better implemented if sustainable well-functioning national health systems are strengthened and involved in delivering the Strategy. EPHA strongly recommends that the European Commission implements cost-effective policies that are based on evidence. For the same reasons, we advise that the EU Health Strategy must build on existing resources, commitments and objectives. Also, it is very important for EPHA and its members that the EU Health Strategy is approached within the global governance framework on health, represented by the World Health Organisation.

- **Fostering health criteria on the agendas of policy-makers:** Although the case is strong to advocate for a *health in all policies* approach, we understand that some other departments may be reluctant to implement this approach. One of
the challenges of the EU Health Strategy is how to foster health criteria on the agendas of policy-makers who have not previously considered health as part of their portfolio.

- **An adequate of use of the regulatory framework:** EPHA expresses caution at the use of self-regulation because it has been proven that this method fails to protect public health. Non-legislative instruments, such as the Open Method of Coordination, can contribute to improving Member State coordination and preparedness to respond to health threats. It can also be an efficient tool to strengthen health systems while respecting the subsidiarity principle. EPHA strongly recommends that the establishment of Health Impact Assessments of all EU policies should be a clear priority of the EU Strategy.

- **A clear commitment from Member States:** In EPHA’s view, given that ultimately Member States are going to deliver the strategy, they have to agree and develop a sense of ownership of the strategy. The Council response to the Health strategy must involve a definite commitment to implement and allocate the necessary resources for the effective implementation of the Strategy.

- **Strengthening NGOs’ role in decision-making and establishing of a participatory status for NGOs:** NGOs are crucial partners to develop and implement the health strategy. EPHA calls for the establishment of a participatory status for NGOs that would support the involvement of health NGOs in policy making beyond DG SANCO. This will ultimately strengthen the implementation of a health in all policies approach across the European Commission DGs.

I look forward to discussing the Strategy more in details with you,

Kind regards,

Anne

--
Anne Hoel
Policy Officer

European Public Health Alliance (EPHA) – the NGO Health Network