



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

Brussels, 23 May 2007
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Opinion

Title **Impact Assessment on: White Paper 'Together for Health: Strategic Approach for the EU 2008-2017'**

(draft version of 25 April 2007)

Lead DG **DG SANCO**

1) Impact Assessment Board Opinion

(A) Context

In 2000, the Commission adopted the first Health Strategy which led to the Public Health Programme (2003-2008). As a follow-up, the IA report examines the need for a new European Community Health Strategy 2008-2017. The proposed strategy intends to respond to the main challenges by setting objectives for the coming decade, taking a new approach to health as a cross-sectoral issue affected by all policies, and to global health issues.

(B) Positive aspects

Extensive stakeholder input has been sought on a number of issues during 2006-2007 including from various experts and an expert panel.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG.

General recommendation: The IA report requires substantial improvements in several key aspects: there should be a more focused and coherent analysis of problems and objectives, all four policy options should be assessed and compared in a structured manner and the added value of action at EU level should be better justified. Given these recommendations and taking into account the nature of the proposal (White Paper), the Board recommends that DG SANCO re-submits a revised draft impact assessment, on which the Board will issue a new opinion.

(1) The coherence between problem definition, objectives and options should be improved. While the objectives and options are focused on procedural and institutional issues, the problem definition takes a very broad approach covering the health sector as a whole without identifying particular shortcomings in the existing mechanisms and measures for co-operation and information exchange. This mismatch should be corrected, for example by clarifying in the problem definition the nature and scale of specific procedural problems at Member State and at EU-level. Internal Commission issues should not be addressed in the context of this report other than to present agreed changes.

(2) The added value of proposed EU-level action needs to be clarified. Following the more focused problem definition, the impact assessment needs to bring out more clearly the added value of EU action such as introducing an open method of coordination and target setting.

(3) The impact analysis should be comparable for all options. The three pillar analysis (economic, social, environmental) is only carried out for the status quo option (option 1). The options 2, 3 and 4 are broader, yet the impacts are not assessed in comparable terms. This is not in line with the IA guidelines and should be corrected as it makes it difficult to compare options.

(4) The timescale for the strategy (up to 2017) needs to be explained. As the timescale slips over the agreed financial perspectives and the mandates of the current and subsequent Commission, further explanation needs to be provided to substantiate this approach.

(D) Procedure and presentation

It appears that all necessary procedural elements have been complied with. However, in light of the principle of proportionate analysis and the rather limited nature of the measures presented in the preferred option, a shorter document would have been sufficient.

2) IAB scrutiny process

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