



Brussels, 25 MAI 2009
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Opinion

Title **Draft Impact Assessment Report for the Commission Communication: "Solidarity in health: Reducing Health inequalities in the EU"**

(draft version of 22 April 2009)

Lead DG **SANCO/EMPL**

1) Impact Assessment Board Opinion

(A) Context

This impact assessment considers policy options for the initiative "Solidarity in Health: Reducing Health Inequalities in the EU". It concentrates on the rationale for action and potential EU added value. The last five years have seen increasing attention to inequalities in health between and within Member States, and the current economic crisis has raised concerns that these inequalities may get bigger. The EU can play a role, notably by raising awareness, facilitating the exchange of information and good practice and enabling policy coordination. In addition, on the basis of the EC Treaty, the EU must ensure that all policies and activities provide a high level of health protection and strengthen economic and social cohesion. There have been calls for further EU action in Council, Parliament and the Committee of the Regions. The legal base is Article 152 of the EC Treaty, with additional arguments linking the initiative to Art. 158 and 159 (cohesion), 125 (promoting adaptable workforce), 136 and 137 (fundamental social rights), and 12 and 13 (anti-discrimination).

(B) Positive aspects

The report is written in clear language and is accessible for non-specialist readers. It presents a useful overview of existing health inequalities within and between Member States.

(C) Main recommendations for improvements

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

General recommendation:

The report needs to be substantially rewritten to clarify the scope of the problem that the initiative will address, and what would be realistic objectives for EU policy actions in this area. It should make better use of available evidence on the effectiveness of existing policies in Member States and provide an analysis of subsidiarity and proportionality issues. During the IAB meeting, DGs SANCO and EMPL agreed to make the necessary changes in the impact assessment on this basis.

In the light of these recommendations, the Board would like to examine a revised Report, on which it will issue a new opinion.

(1) The report should reformulate the objectives for EU action at an appropriate level of ambition for the given policy context. The report should also give a clearer overview of the way in which the proposed initiative is linked with existing EU policies. The report should avoid confusion between the two concepts (inequalities and inequities) that have very different political consequences and explain them in a pedagogic way. It should be more explicit about the competences of the EU in this area and, as a consequence, about the scope of this initiative, emphasising better data collection and strengthening of the knowledge base. The problem definition should be more concise and focused and show the drivers behind problems; and this should be reflected in a more concrete and realistic set of objectives. For example, the current general objectives, which are rather wide-ranging and ambitious, could be replaced by the current operational objectives. An overview of the ways in which this proposal is linked to other EU policies should also be added to section 2 of the report.

(2) The report should elaborate the baseline scenario by explaining to what extent causal links between different factors have been assumed or only inferred from statistical correlation. To illustrate possible causal links, such as between the level of GDP and health inequalities, the report should make better use of available evidence on the effects of existing actions at Member State and EU level on people's health and the disparities between and within Member States.

(3) The report should provide a consolidated presentation of the costs that will be associated with the different options, especially options 2 and 3. It would also benefit from a clear analysis of all policy options as regards respect of the principles of subsidiarity and proportionality. The report should produce cost figures for the main options, not only direct costs but also administrative burdens that additional data collection might impose on different actors. It should also either contain a separate section in which all relevant subsidiarity and proportionality issues are discussed, or provide for separate analysis in the assessment of each of the presented options.

(D) Procedure and presentation

The report should provide more information on the input from the Committee of the Regions, as preparation for the report.

2) IAB scrutiny process

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| Author DG | SANCO, EMPL |
| External expertise used | No |
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