



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

Brussels, 15 JUL. 2009  
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Opinion

Title **Draft Impact Assessment Report for the Commission Communication: "Solidarity in health: Reducing Health inequalities in the EU" – resubmission**  
(draft version of 29 June 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 has been substantially rewritten on the basis of the Board's recommendations. The presentation of the scope of the problem is clearer, and the level of ambition of the objectives for the initiative is more realistic.

**(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:**

Although the quality and usefulness of the report have improved, it should still ensure that the complementarities between different policy initiatives and levels are well explained, also in the light of subsidiarity and proportionality issues. The report should indicate in more detail how the knowledge and data gaps will be closed in the future. It should also clarify the implementation costs of the options.

**(1) The report should clarify how the policy options presented in this report complement or reinforce existing policies at EU level and in Member States to attain the objectives. The analysis of subsidiarity and proportionality should still be further clarified.** Although the report provides more information on existing policies both at EU level and in the Member States, it should attempt to indicate more precisely how these policies interact and where there are gaps that justify community action.

**(2) The report should assess further to what extent assumed causal links are supported by evidence, and it should indicate in more detail how existing knowledge and data gaps will be closed in the future.** The section on the drivers of the problem should avoid inappropriate conclusions or inferences with regard to causality from statistical association. It should refer to solid evidence where available, and indicate how such evidence has been taken into account in the design of more effective policy options. It should address the need for future evaluation of the total array of policies that aim at the reduction of unjust and unnecessary health inequalities, and indicate in more detail how this will be resolved. The monitoring and evaluation section should show in more detail how the drivers of unjust and unnecessary health inequalities and the possibility to influence them through specific types of public intervention will be investigated.

**(3) The report should provide a more complete overview of the costs that would be associated with the different options, especially options 2 and 3.** As requested in the first opinion, the report should produce cost figures for the main options, not only estimated administrative burdens associated with data collection, but also direct implementation and compliance costs for different actors, including national and local administrations.

#### **(D) Procedure and presentation**

The revised report includes a short section on the input from the Committee of the Regions, as preparation for this Impact Assessment. The inter-service steering group has apparently not been consulted on the rewritten IA report.

## 2) IAB scrutiny process

Reference number	2009/SANCO+/031 (CLWP/priority)
Author DG	SANCO, EMPL
External expertise used	No
Date of Board Meeting	Written procedure
Date of adoption of Opinion	<b>15 JUL. 2009</b> The present opinion concerns a resubmitted draft IA report. The first IAB opinion was issued on 25 May 2009.