



EuroHealthNet's response to the consultation on WHO European Health 2020 policy framework and draft European Action Plan for Strengthening Public Health Capacities and Services (EAP/PHS)

EuroHealthNet very much welcomes WHO's initiative to develop an overarching policy framework for the European region based on values of human rights, social justice, participation, partnership and sustainability. We also very much welcome this framework's ambition to pursue better and more equitable health, as well as well-being.

Given EuroHealthNet's own commitment to promoting health and equity, we are keen to work in partnership with WHO Regional Office for Europe on these issues. This has already been reflected in our collaboration on the 2nd sub-regional technical consultation on the EAP/PHS (the Action Plan), and through our contribution to the Advisory Group on the EAP/PHS. We are looking forward to advance this partnership, sharing the huge body of expertise and knowledge that is available within our membership, also liaising with our EU and international partners.

Comments as regards Health 2020

The title and introduction of the strategy present well-being as a prominent concept, on a par with, but different from, health. This is an important step forward, and in line with the new thinking on promoting health and social equity. The emphasis on well-being, however, seems to get lost somewhat in the further details of the strategy. We suggest to redress this balance, also in the Action Plan.

EuroHealthNet agrees the Health 2020 goal can only be achieved via a collective effort. While many different partners can and should play a role here, we think that the potential benefit of synergies with EU instruments and processes deserves more emphasis. For example, the progress made on the six topics that have been subject to specific collaboration (via 'roadmaps') between WHO Office for Europe and the European Commission could be specified in more detail. We think that WHO could build more on the progress made through collaborative efforts via EU-funded activities. These activities have generated a huge body of knowledge and paved the way for a wide range of innovations that could also be relevant to WHO's non-EU European Member States. It seems prudent to maximise resources and avoid duplication in this respect. The same holds true for the various coordinated efforts

that EU Member States have agreed to embark on, e.g. as regards the development of national action plans on cancer and rare diseases, and the sharing of good practice. In addition to the key role of DG SANCO there is also scope to focus on 'health in other EU policies', as was so amply demonstrated by the various Commission contributions at the Brussels technical consultation meeting in March.

Comments as regards the Action Plan and the EPHOs

EuroHealthNet appreciates the complexity of WHO's effort: the new strategy and Action Plan are to accommodate for the wealth of new insights, concepts and evidence gathered over the past 20 years. Extensive background studies, short and long versions of the strategy, and an Action Plan with Essential Public Health Operations (EPHOs) all need to come together and mutually reinforce each other. We think that more clarity is needed on how the Action Plan fits within the broader Health 2020 process, how it relates to the 'short' and 'long' versions of the Health 2020 document, to what extent EPHOs and Avenues for action differ, and how they are interlinked. The added value of the Avenues for Action is unclear and could be reconsidered.

Health 2020 is to generate new energy, radiate a sense of urgency and forge new alliances. The Action Plan presents a unique opportunity to reshape public health and deliver fresh, innovative approaches. We believe, however, that this current version of the Action Plan does not meet that expectation. We understand the challenge to develop a plan that has to meet the needs of 53 Member States which differ considerably in terms of their socio-economic, historic and cultural contexts. Nevertheless, care should be taken that the Action Plan champions progressive public health approaches or at least does not undermine them. At the moment the Action Plan radiates a rather traditional feel, leaning rather heavily on concepts from public health medicine. This also affects a rather narrow approach taken to health promotion, which is not congruent with the Health 2020 aspiration to bring 'new dynamism to the concept of health promotion'. We also think the values and aspiration that are so central to Health 2020 could be clearly stressed in an introductory chapter to the Action Plan.

The EAP/PHS is an important vehicle for implementing Health 2020. WHO has stressed the need for the Action Plan's full consistency with the Health 2020 strategy, especially with a whole-of-government approach able to act on structural and social determinants of health and on tackling health inequities. EuroHealthNet acknowledges the importance of such action, and would like to see the EAP/PHS address much more prominently what can be done to tackle health inequalities and the health gradient across the various EPHOs. A social gradient perspective should be included in each public health action to ensure different socio-economic groups are reached and benefit from the public health intervention.

We also suggest the Action Plan puts greater emphasis on developing public health advocacy and leadership skills; co-ordinated data collection and analysis; prioritisation and capacity to strengthen the evidence base policy making; improving

capacity and tools for monitoring and evaluation; and on for cost-effectiveness analysis and research to bring forward strong arguments for policy makers in times of economic crisis.

In the present draft document, we perceive the EPHOs as rather theoretical concepts. Instead, we would like to suggest that they reflect better the reality of public health systems and incorporate the latest developments. If the EPHOs are to equip public health systems to tackle the current challenges in population health in a better way, this calls for a more prominent focus on issues such as, climate change (both adaptation and mitigation), health inequities, sustainable development, obesity and chronic diseases.

Relevance for public health practice may also be enhanced by clustering the ten EPHOs into three categories: 1) Knowledge and surveillance base; 2) Governance and organizational base; and 3) Action base, with communication and social determinants of health and health inequalities as cross-cutting dimensions.

In order to encourage a wide and frequent use of the EPHO self-assessment tool we suggest simplifying this tool, as the current version is very detailed.

Strengthening public health capacity is not synonymous with strengthening public health as a profession, not with strengthening public health professionals. We think that the Action Plan should better address the need to increase capacity for public health in other sectors, and do justice to the Health 2020 aspiration to develop and support more political leadership and governance.