

## EuroHealthNet input to the European Commission's call for evidence on the EU comprehensive approach to Mental Health

- February 2023

EuroHealthNet is a not-for-profit European partnership of organisations, agencies and statutory bodies working on public health, health promotion, disease prevention, and reducing inequalities. With a long-term commitment to health, equity, and wellbeing, EuroHealthNet recognises the importance of timely, ambitious and comprehensive **actions addressing underlying determinants of mental health and psychosocial wellbeing, at individual, community and systemic levels.**

EuroHealthNet welcomes the European Commission's efforts toward the upcoming EU Mental Health approach and this call for evidence. We agree with its rationale, i.e. the need to urgently address the burden of mental health disorders and promote good psychosocial wellbeing, which was already evident and well-documented pre-crises.<sup>1</sup> We also agree with the assumption made that due to the syndemic-pandemic, the war in Ukraine, the climate emergency, and now the rising cost of living crisis ('the polycrisis'), the figures of 1 in 6 EU citizens, accounting for 4% mortality and 4% GDP are almost certainly an underestimation.

In order to mitigate further devastating impacts of the polycrisis on mental health and psychosocial wellbeing, and to urgently address gaps in access and timely support to mental health, having a vision and updating existing repositories of good practice (which we understand this comprehensive approach will offer) is a good first step. However, a fully-fledged Strategy would be of much stronger impact both practically and politically. **EuroHealthNet calls on the European Commission to develop and launch an EU-wide strategy that:**

- First and foremost, takes a human-rights based approach to (mental) health, moving away from considering the benefits of investing in mental health and wellbeing from an economic perspective alone, and in doing so rooting the benefits of proposed actions in the emerging Economy of Wellbeing approach
- Promotes a psychosocial holistic model of mental health as an outcome shaped by social, psychological and biological factors, taking into account the systematic and structural socioeconomic and environmental determinants of health
- Takes a life-course and proportionate universalism approach to health, with a strong prevention-oriented focus
- Mainstreams mental health across all EU policies and governance levels, while recommending Member States to follow by implementing instruments to monitor progress – and does so in alignment with EU level processes (e.g., European Semester),

targets (e.g., Social Scoreboard), funds (e.g., Recovery and Resilience Funds, Multi-annual Financial Frameworks), and tools (e.g., the European Pillar of Social Rights)

- Builds multi-stakeholder capacity and inclusive participation into the implementation of the initiative.

## **Human rights-based approach and the Economy of Wellbeing argumentation**

Making an investment case for mental health and psychosocial wellbeing cannot be limited to actions within healthcare systems and services. It is about ensuring that European society is citizen-centred, resilient and cohesive – a focus that has become even more important in the recovery and regenerative policy climate. The good mental health of the European population is a fundamental resource for preparedness, stability, and economic prosperity, as well as for quality of life. This is why EuroHealthNet recommends **aligning the agenda of the upcoming EU Mental Health approach with the emerging Economy of Wellbeing models, advocating use of health, equity and wellbeing-based targets and indicators to measure progress and success of our societies first, then economies.**

Recognising the primary responsibility for the organisation and delivery of mental health support remains within Member States, we see EU added value of pooled expertise and exchange of good practice across the region, coordinated and accompanied by evidence-based EU legislative proposals, if adequate, appropriate and proportionate. For this reason, **we recommend that the European Commission works towards a European Mental Health Strategy that is time-bound, defines responsibilities, funding, and indicators to monitor progress across the EU Member States.** Ideally, this would steer national-level work by, for example, requiring states to develop and implement Action Plans which the European Commission could periodically review and convene countries to exchange and inspire to strive for ambitious actions. In absence of a dedicated EU-level coordination mechanism that helps EU and Member States health stakeholders define, govern and pursue common plans for change, we fear the focus of mental health and psychosocial initiatives will remain on easier – ‘downstream’ and lifestyle-oriented actions, with too little consideration for more severe mental health disorders and ‘upstream’ factors influencing these, such as socioeconomic and commercial determinants.

## **Mainstreaming psychosocial model of mental health in all EU policies, accounting for the systemic and structural socio-economic and environmental determinants of health**

EuroHealthNet welcomes the initiative’s “prevention-oriented approach to mental health” as a public health issue and its objective to mainstream mental health into EU policies. To this end,

as alluded to earlier, we call on the European Commission to implement a psychosocial model of mental health which addresses socio-economic, political, climate and commercial determinants of health, structural and systemic barriers, and governance-level responsibilities for population mental health. The quality of the environments in which we live in, such as air pollution, increased living density, and lack of green spaces, can significantly worsen mental health across all age groups. This should be approached through **multi-sectoral perspectives, whereby existing solutions and emerging new models of health-enhancing and promoting care be incorporated across all of our physical environments**, i.e., social prescribing models<sup>ii</sup> nature-based solutions to mental health, culture and arts contribution to positive individual and community health.<sup>iii</sup> Such a **strategy should also address discrimination and violation which can both cause and result in mental health struggles, by strengthening the intertwined link between mental health and human rights**.

Further, EuroHealthNet suggests the European Mental Health Strategy to come up with **feasible mechanisms to promote mainstreaming of psychosocial model of mental health in all policies at EU level**. The mechanism could mimic ones developed and implemented for health (equity) impacts assessments (HIAs) and would ensure that mental health considerations are built into the design, implementation, monitoring and (re-)evaluation of policy, legislation and spending programmes at EU level. This should also consider **co-creative and participatory processes of inclusive representation of relevant stakeholders and beneficiaries**.

### **Life-course, enabling settings, and proportionate universalism approach – starting early and intensifying support when and where most needed**

Investments in enabling, psychosocial resilience-oriented environments and settings should receive a much stronger place in the proposed structure of the initiative. As the primary responsibility for ‘getting better’ should not solely be placed on individuals, system-based solutions offer more impactful and sustainable outcomes. As evidence shows, focusing on awareness-raising and literacy-increasing activities is not only resource intensive but will only be as effective as people’s resources and means to amend their behaviours or choices.<sup>iv</sup> The rising cost of living shows that it is increasingly more difficult for people to adopt healthier lifestyles if their incomes drop.<sup>v</sup> **Integrated, systemic and up-stream approaches to building people’s resilience to challenges and shocks through caring and regenerative communities and living environments –without overemphasising digital spaces - must be prioritised**.

Early years and educational settings, schools, workplaces, retirement homes, communities of practice, have the most accurate picture of the mental health and psychosocial needs, and in a

position to design, deliver and maintain support.<sup>vi</sup> EuroHealthNet is particularly concerned about the mounting burden of psychosocial ill-health among children, adolescents and the youth, as well as the older working population. Here, **we recommend intensified support, as evidence shows these population groups being disproportionately affected by the recent polycrises** (the pandemic, the energy crisis, costs of the green and digital transition).<sup>vii</sup> Diverse support schemes exist, such as those set up in the context of the European Child Guarantee.<sup>viii</sup> Workplaces- concerned, this could be done through encouraging lifelong learning and development of diverse skillsets. In addition, it could focus on offering options for flexible working, leveraging ‘bidirectional’ mentoring processes, flexible leave and retirement structures, establishing supportive policies and strengthening organisational capacities for health benefits, and identifying (mental) ‘health promoters’ and promising programmes.<sup>ix</sup>

### **Monitoring framework and the need for targets and indicators to steer policy, practice, research and investments decisions**

EuroHealthNet recommends that a future monitoring framework is set up to make use of disaggregated data (by age, gender, regions, SES, economic deprivation) and indicators on suicides and depression complemented by occupational health (work-related stress and anxiety, burn-out), co-morbidity with other chronic NCDs. There are a number of country-level examples of such monitoring infrastructure that can be drawn upon and shared between states and regions. We also recommend the **monitoring activities to reflect on how mental health co-plays with the quality of and access to structural health determinants** such as housing, energy, environment, food systems, work-life balance or commercial factors. For this to take roots, a more coherent strategic and coordinated approach to implementing policies at the EU level is needed. **A conceptual framework for public mental health, including indicators that measure not only mental health and wellbeing, but also its determinants and consequences must be part of it.**

Moreover, the UN Availability, Accessibility, Acceptability and Quality Framework would be a strong guideline to mainstream mental health across EU policies and national governance levels.<sup>xi</sup> This would **embed the right to mental health services in the design of health strategies, service facilities, and regional level decision-making.** The model can also serve as a tool to reduce the stigmatisation of mental health and limit the associated barriers to seeking care and treatment.

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