

EU's significant first step towards a comprehensive approach to mental health and a building block of the European Health Union

A systems-approach that addresses the structural determinants of mental health, must be put at the forefront and be embedded into an action framework for Member States that extends beyond current, largely fragmented initiatives for mental health.

On 7 June 2023, the European Commission launched its first-ever vision for [an EU comprehensive approach to mental health](#). It acknowledges that **mental health is an integral part of overall health, with an impact on all aspects of a person's life**, including on family, friends, and co-workers, and sets a long-awaited common ground for EU-wide action across diverse sectors.

EuroHealthNet welcomes this move as it represents a significant **first step towards better mental health for all in all policies** and applauds the European Commission for identifying this initiative as the **final building block of the European Health Union**.

There is no health without mental health and there can be no European Health Union without equal and timely access to prevention, treatment and care for our mental health.

- Stella Kyriakides, Commissioner for Health, and Food Safety

Ongoing initiatives are in progress, and the Communication provides a useful summary of all the actions already taken and those promised to be taken in the future (via 20 so-called Flagship Initiatives). However, **it remains to be seen how all these efforts could work in unison, leading to an overarching strategic approach, and include commitments to concrete, measurable objectives.**

EuroHealthNet followed the development of the initiative from its inception, through participation in diverse high-level policy meetings, [coordination with our Members and partners](#), as well as [contribution to the European Commission public consultation](#).

EuroHealthNet's key recommendations have been to propose an **EU Directive on psychosocial risk at work** and to develop an **EU-wide strategy on mental health and psychosocial wellbeing**. This strategy should root in time-bound targets, assigned budget,

and outcome monitoring of a coherent set of actions that all **EU Member States agree to work towards**. The EU-wide strategy could be further operationalised via **national action plans**, periodically reviewed and updated if appropriate.

EuroHealthNet applauds the acknowledgement of mental health as central to the lives of all European citizens and the dedication to eradicate stigma, inequality, and discrimination. The Communication outlines major aspects of promoting and protecting mental health across sectors and in whole of society.

Bold decisions are now needed on how to move forward, building capacities and enabling spaces to engage for (sub)national authorities, stakeholders, communities and people with lived experience themselves.

Dorota Sienkiewicz, Policy Manager at EuroHealthNet

The Communication is very welcome in its approach to considering the structural determinants that shape mental health outcomes by advocating for mental health promotion and prevention of mental ill-health in different settings and across the life course. It's important that there is a shared vision for population mental health, shared defined goals for the different initiatives in this Communication.

Laura Shields Zeeman, Head Public Mental Health and Prevention, The Trimbos Institute, the Netherlands

A comprehensive approach

EuroHealthNet applauds the European Commission's front and central focus on mental health in all policies. The approach rightfully includes the whole-of-society, addresses the broader determinants of health and structural drivers of inequalities in mental health opportunities and outcomes. This notably involves action on the socioeconomic, commercial, digital, and environmental determinants of health, to hopefully bring us a step closer to the Economy of Wellbeing that EuroHealthNet has been advocating for.

We welcome that the Communication speaks of the economic costs of mental diseases – which are mounting - and that it highlights that **we cannot afford inaction**, neither financially nor ethically. Particularly, we support the notion that **approaches to mental health should be holistic, include the most affected communities and disadvantaged population groups, and be rooted in key settings**, such as schools, workplaces, homes for older people, or prisons.

(...) an important step towards a healthier Europe, where the psychosocial needs of the most vulnerable of our societies are at the heart of our efforts.

Margaritis Schinas,
Vice-President for Promoting our European Way of Life

It is time we confront the issue head-on for the benefit of our workers and our economy alike. (...) Our mental health at work is just as important as our physical health.

Nicolas Schmit, Commissioner for Jobs, and Social Rights

While such plans are backed up with flagship initiatives such as [EU-OSHA Healthy Workplaces Campaign](#) and [Pathways to School success](#), we encourage policymakers to go beyond offering support via communication campaigns, pledges and exchange of good practice. Further implementation and evaluation of implementation processes of good practices for mental health promotion and prevention is also needed. We are pleased to sense the European Commission's inclination toward proposing an EU-wide Directive on Psychosocial Risks at Work, one of the key recommendations from EuroHealthNet and other stakeholders. EuroHealthNet actively supports these approaches through our work on the EU-funded [Schools4Health](#), [MENTALITY](#), and [IceHearts](#) projects. However, the Communication falls short in clarity: **While diverse communities are referred to as 'key stakeholders', it remains open as to whether this signifies that the EU aims to actively include their voices in future initiatives, and if so, how exactly and to what extent.** Also, the role of sub-national authorities, regions and municipalities is absent from the proposal.

We applaud the fact that **the role of physical activity, culture and arts, and nature in mental health promotion and prevention** is largely supported in the Communication. This commitment to investigating the effectiveness of treatment options for those who do not respond well to the established therapies – therapies that often promote biomedical interventions and risk leading to over-medicalisation - is a key step forward. EuroHealthNet

has long advocated for good and promising emerging practices such as [social prescribing](#) and [nature-based solutions](#) to be considered in helping to embed such solutions into health systems. **We are particularly keen to see its uptake increase in the context of primary health care settings, strengthening caring communities and healthy living environments.**

Inequality

EU Health Commissioner Stella Kyriakides [confirmed](#) that it is the Commission's vision to aim for **an EU in which everyone who needs mental health support will know how to find it and receive it**. This is currently still far from the reality in many EU countries. Nevertheless, stating it so explicitly sends the right message so that the institutions:

1. Recognise that poor mental health or mental disorders are not a trait, but part of a **continuum** and individual situations can be improved;
2. Promote a **systemic change approach**, rather than leaving the responsibility with the individuals only.

It is commendable that the EC Communication puts the fight against stigma at its core. This also sends a strong message whereby people are invited and encouraged to seek help in a society that supports their aim to get better, rather than one that shuns them. We are glad that groups with specific needs, especially people in situations of vulnerability, are explicitly identified in this Communication and specialised support is promised. This includes **children and young people, women, older people, migrants, LGBTIQ+, people experiencing homelessness, refugees, people living in rural areas, and people living with disabilities**.

With four flagship initiatives, youth are a strong focus in the Communication, which is not only acknowledging their specific needs, but also an investment in a mentally healthy future society. This topic will be monitored through the **Child and Youth Mental Health Network**, while specific prevention tools for these population groups will be designed through **Children Health 360 and the Youth First Flagship**. We remain hopeful that the understanding of the specific barriers to access support faced by various groups will also be considered in developing all flagships; specifically when it comes to the **European Depression and Suicide Prevention Initiative and EU Code for Mental Health**, where barriers to access could have dire consequences.

Measurement and data

The Communication commits to include a specific set of questions to **measure mental health** outcomes as part of the European Health Interview Survey (EHIS) by 2025, as well as a mental health section in the country health profiles, starting from 2023. However, there

seems to be no specification as to how this data will look like (yet), what data sources exist and **how they are linked to the evaluation of the outcomes of current mental health focused initiatives.**

It is our hope that the proposed measurements will improve the understanding of societal mental health, help to identify the need for further policy action, and measure the equitable distribution of the effects of interventions. Such large-scale surveys provide the opportunity for representative sub-group analyses, and as such, we urge the European Commission to use this momentum and **allocate funds to further investigate inequalities in mental health and wellbeing and the role of social, environmental, digital, and commercial determinants.** Such measurements should be rooted in clear definitions of terminology surrounding mental health, including well-being, mental ill-health, and mental disorders, to help define clear and measurable goals of policies and other interventions.

Overall, better use of indicators and measurements can help move away **from a pre-dominantly biomedicine-oriented policy, practice, and research in mental health and as part of the European Health Union.** Improved data can help to better understanding of the factors that drive recovery and build resilience, and guide investments in **implementing structural and systemic changes**, rather than a focus only on individual strategies and factors.

The European Commission also commits to regular assessments of access to prevention and treatment of mental health problems, but it remains unclear in as to how exactly they will operate, how they will be funded, as well as their links to what the Communication promises will be measured. The Commission could enable **synergies between annual data collection and evaluation of interventions as well as gain insights into behavioural and cultural factors (BCI) that impact people's access and uptake of mental health services.** The promised review of the ECDC mandate to include non-communicable diseases could also make synergies **with mental health, BCI, preparedness and crises response stronger as part of a more holistic European Health Union.**

Funding

At first sight, the funding for all these initiatives appears vast. The Communication promises a total budget of 1.23 billion Euros to support mental health. EuroHealthNet applauds such large funding commitment, yet it appears **that only some of these funds are new and bound to specific targets and measurements.** The allocation combines contributions from several funding instruments at the EU's disposal. Part of these funds have already been distributed through various ongoing commitments and the remainder would cover the next several years, certainly until 2027, which marks the cut-off date for the current EU long-term budget. However, it is hard to tell how much funding has been allocated to achieve the

different goals laid out in the communication, as an overview of all relevant projects and their mental health objectives and outcomes does not (yet) exist.

Conclusion

EuroHealthNet sees the EC Communication as a significant milestone. The Communication kick-starts a comprehensive mental health approach, capitalises on the momentum of the efforts made over the past year, and lays the building blocks for the future development of an EU-wide Mental Health Strategy by the new European Commission as of 2024. For this to happen, we encourage that more specific goals and targets are set, including a clear timeline under a unified framework for action, where achievements—or the lack thereof—are measured and learned from.

Recommendations

- **Develop an EU-wide Mental Health in All Policies Strategy** firmly rooted in the underlying **socio-economic, environmental (incl. climate change), digital and commercial determinants of health**, and acting on these via **concrete measures**, strengthen the recovery/resilience aspects of caring communities, living, and working environments; providing a framework for member states to apply measures nationally
- **Align this comprehensive approach to mental health with ongoing EU efforts to transition toward an [Economy for Well-Being](#)**. This could be done by including mental health as part of the EU annual strategic foresight exercise within a wellbeing monitoring framework; ensure the annual cycle of the European Semester process reflects the EU Member States' needs for reforms and investments for prevention and promotion of mental health, psychosocial wellbeing, and health equity.
- **Propose ambitious plans for legislative actions within the EU aquis communautaire**, such as EU Directives and Regulations; swiftly follow up in developing EU Directives on Psychosocial Risks at Work and on Marketing and Advertising to Children, and protecting mental health in plans for the Digital Services Act and the Artificial Intelligence Act
- **Explore use of the Open Method of Coordination (OMC) between EU Member States through, for example, National Action Plans** with targets, indicators, milestones and deliverables, and a concrete timeline by 2030, supported by adequate and regular data collections.

- Reaffirm and promote the funds made available for **capacity building of (sub)national authorities and stakeholders for mental health promotion**, under the Technical Support Instrument. Encourage the creation of tools and putting into place wider group of experts to oversee such capacity building and competences for intersectoral and multistakeholder collaboration for mental health promotion.
- **Maintain dialogue with EU Member States** as an imperative and open the European Commission's **Expert Group on Public Health subgroup on Mental Health** to sub-national and civil society actors – while the Communication promises support to countries, it is important to identify whether the monetary resources provided are sufficient, and whether there is enough political will and workforce available to realise all undertakings.
- An **EU Year for Mental Health** as well as an **EU Year for Wellbeing Economy** could support showing how serious the EU takes the issue and galvanise action for better mental health and psychosocial wellbeing as promised in the Communication.

The EuroHealthNet Partnership is and will remain committed to supporting the further implementation of this important Mental Health initiative, bringing member agencies and partners along on the journey. Listening to what national and regional public health authorities need, and how their capacities to act can be supported is one of our next steps.



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