



Stella Kyriakides
Commissioner for Health and Food Safety
European Commission

Brussels, 11 March 2021

Dear Commissioner Kyriakides,

Following the publication of the Management Plan 2021 DG Health and Food Safety (SANTE),¹ the European Public Health Alliance and EuroHealthNet would like to express their concern about a missed opportunity to prioritise and advance health equity as one of SANTE's strategic objectives and as an urgent response to the inequitable consequences of the COVID-19 pandemic/syndemic.

Manifesting themselves all along a social gradient, health inequalities remain a major obstacle for achieving a sustainable recovery. They disproportionately affect families and children living in poverty as well as vulnerable and socially excluded groups such as homeless people, persons with disabilities, prisoners, LGBTQI+, ethnic minorities, including Roma, drug users, sex workers, undocumented migrants, refugees and asylum seekers.² Consequently, reducing inequalities in health by improving the effectiveness, accessibility and sustainability of health systems was incorporated in the objectives of the EU4Health programme.³

We are, therefore, surprised not to see a strategic objective promoting substantial investment in health equity in SANTE's plan of work for 2021. There is already substantial and emerging new evidence^{4 5} demonstrating that the COVID-19⁶ syndemic has exposed deeply embedded patterns

¹ Management Plan 2021 DG Health and Food Safety (SANTE): https://ec.europa.eu/info/publications/management-plan-2021-health-and-food-safety_en

² Commission welcomes political agreement on EU4Health, press release, 15 December 2020: https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2420

³ *ibid*

⁴ [Research on the COVID-19 pandemic and health inequalities shows: We are not all in it together](#)

⁵ Health at a Glance 2020: State of health in the EU cycle: https://ec.europa.eu/health/sites/health/files/state/docs/2020_healthatglance_rep_en.pdf

⁶ The COVID-19 pandemic and health inequalities, Journal of Epidemiology and Community Health, 2020: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7298201/>

of inequality in our societies and is widening these,⁷ making action on health inequalities more necessary than ever. We note however that the Health and Food Safety Management Plan 2021 lacks adequate, dedicated and ambitious commitment to tackle health disparities between and within EU Member States. Only one objective on digital health and European Health Data Space makes an explicit reference to “provide high quality healthcare and reduce inequalities in healthcare”, which in itself is already an exemplary of how inequalities in health are (mis-) understood and dealt with at EU level. The WHO Health Equity Status Report initiative laid out that only about 10% of inequalities in health outcomes are due to and within ‘curative’ reach of health services/systems, with large percentage associated with income security and social protection (up to 40%), and living conditions (between 20-30%).⁸

We are concerned that our messages regarding health equity within the frameworks of the EU4Health programme,⁹ national Recovery and Resilience Plans, the European Semester process,¹⁰ the European Pillar of Social Rights and its Action Plan, fall on deaf ears without sustained and dedicated support within DG SANTE’s 2021 Management Plan.

To ensure that Europe really “builds back better” - and fairer - EPHA and EuroHealthNet offer their expertise to work with the European Commission and DG SANTE in particular, to develop measures to comprehensively address health inequalities. These could involve specific actions to improve access to health and preventative care, promote vaccine equity,¹¹ address the digital divide in health, build capacities of (public) health systems including health promotion and disease prevention, address structural, social and commercial determinants of health, and integrate the health and social protection needs of the most vulnerable in the Commission’s work.

We stand ready to support the Commission to develop measures to assess, address and monitor health inequalities within the EU and actively engage with the Commission’s proposal for “new tools for measuring barriers and gaps in access to healthcare”¹² to contribute to the prioritisation of health equity within the 2021 Management Plan. We welcome the new addition to the revised Social Scoreboard with a new health indicator on “standardised preventable mortality and morbidity,”¹³ but again we question how inequalities therein will be captured. We would like to see the relevant data disaggregated to also reflect the nature of health inequalities within and between Member States.

Finally, we note the Commission’s intention to use the EU Health Policy Platform as a major tool to “consult widely with civil society stakeholders” on environmental determinants of health, health inequalities and mental health. We suggest undertaking an evaluation of the Policy Platform to assess how it can do that most optimally. We commit to advance effective policy solutions within

⁷ Offline: COVID-19 is not a pandemic, Lancet 2020: <https://www.thelancet.com/journals/lancet/article/PIIS0140-67362032000-6/fulltext>

⁸ Healthy, prosperous lives for all: the European Health Equity Status Report, WHO 2019:

https://www.euro.who.int/_data/assets/pdf_file/0016/412333/Hesri-executive-summary.pdf?ua=1

⁹ Focus on primary prevention paves the way for a less unequal Europe in the new EU4Health programme, EPHA 2020:

<https://epha.org/focus-on-primary-prevention-paves-the-way-for-a-less-unequal-europe-in-the-new-eu4health-programme/>

¹⁰ Recovering from the COVID-19 pandemic and ensuring health equity — The role of the European Semester, EuroHealthNet 2020:

<https://eurohealthnet.eu/sites/eurohealthnet.eu/files/Recovering%20from%20the%20COVID-19>

[The%20role%20of%20the%20European%20Semester_Report%20final.pdf](https://eurohealthnet.eu/sites/eurohealthnet.eu/files/Recovering%20from%20the%20COVID-19-The%20role%20of%20the%20European%20Semester_Report%20final.pdf)

¹¹ <https://epha.org/vaccine-equity/>

¹² see reference 1

¹³ <https://ec.europa.eu/social/BlobServlet?docId=23696&langId=en>

national Recovery and Resilience Plans, European Semester and mainstream public health policies, and we are keen to see new tools and channels aiming to involve civil society organisations in a strategic dialogue beyond existing structures such as the EU Health Policy Platform.

Dear Commissioner, we appreciate you are extremely busy with today's challenges, but hope you will be able to meet with us to discuss these specific concerns and how we can better work together to ensure that all Europeans are able to benefit from a healthy and sustainable recovery, resilient and health-promoting health systems.

Yours sincerely

Caroline Costongs
Director
EuroHealthNet

Sascha Marschang
Acting Secretary General
European Public Health Alliance

[EuroHealthNet](#) is a not-for-profit organisation made up of over 60 public health authorities working from local to regional, national, and international levels across Europe. Our aim is to improve and sustain health between and within European States through action on the social determinants of health, and to tackle health inequalities

The [European Public Health Alliance](#) is a major public health organisation comprising 85 members-public health organisations, disease groups, health professionals, patients associations. EPHA aims to bring together the public health community to facilitate change; to build public health capacity to deliver equitable solutions to European public health challenges, to improve health and reduce health inequalities.