

Better Regulation for Better Health consultation project – recommendations

Executive summary

The Better Regulation for Better Health project has organised a consultation activity to identify barriers and enablers of civil society participation, particularly in terms of consultation activities (i.e., surveys, workshops, events, feedback processes). Elements such as capacity, access to funding and the setting and design of the avenues and/or platforms for participation can be enablers as much as barriers to civil society participation.

The consultation project ran from March to June 2024 and was disseminated to health civil society organisations among EPHA’s networks, in particular the EU4Health Civil Society Alliance and the Food Policy Coalition. The consultation was meant for organisations that had experience with at least one consultation related to public health, but not necessarily a consultation led by DG SANTE.

In total, 29 representatives from civil society organisations took part in the survey, including 26 representatives from non-governmental organisations (NGOs) and 3 representatives from professional associations. Among the respondents, 20 were representatives of organisations established at the EU/European level, while 3 worked on the global level and 6 on the national one. Overall, the organisations’ areas of work include a wide range of public health issues, ranging from non-communicable diseases, cancer, disease-focused organisations, to environmental prevention, primary health care, social rights, healthcare workforce, mental health, harm reduction, patient advocacy and public health in general. The results of the study were anonymised and summarised by consultation type.

This document presents the results of the survey, culminating in 10 key recommendations, articulated in three key priorities, for improved avenues involving civil society in policy-making:

Improve design and planning to make it more accessible

1. Improve the written feedback designs: improve questionnaires’ design, make them more user-friendly, and allow for more in-depth feedback. Provide more information in advance on the specific topic/piece of legislation, to support the preparation of feedback.
2. Improve planning: Adapt the timelines taking into consideration the needs of respondents, including those of networks/consortia. Make the consultations long enough to secure the legitimacy of the processes.
3. Improve the design of events: foresee input gathering in smaller group discussions and consider in person events for more meaningful participation of civil society in decision-making processes. Improve the opportunities for exchange in online/hybrid events, that are more inclusive.

Make the processes more meaningful, inclusive and diverse

4. Foresee more meaningful participation: move away from the tick-box exercise model/framework, and, specifically, envisage stronger citizen involvement in policy-making processes.
5. Ensure more balance, inclusivity and diversity in feedback and representation in events between private and public interest stakeholders and provide possibilities to be heard equally. This involves creating more opportunities to meet with civil society, or at least a balanced number of meetings. Provide greater diversity and transparency in the selection of participants, by focusing on underrepresented groups.
6. Improve participation: strengthen the visibility and accessibility of the process, make it more user-friendly, particularly for marginalised, vulnerable groups and smaller organisations. Provide resources to support the involvement of civil society in regular meetings and activities, particularly for smaller organisations from outside of Brussels.
7. Allocate more time for interaction: Secure sufficient time for civil society views in every conference. Ensure the participation of groups most affected by decisions discussed in the events.

Increase transparency to build trust

8. Enhance transparency: Strengthen transparency of the consultation process, including by providing information on how stakeholder input will be used and ensuring that feedback is acted upon in a timely manner. Ensure that the Transparency Register publishes further details about the European Commission's bilateral meetings.
9. Integrate feedback loops: Communicate back to the stakeholders on how their input was considered. Allow participants to understand the impact of their input, to learn from the decision-making process, and to refine their future contributions making them more effective, increasing the confidence in the process.
10. Build trust: by implementing the recommendations above, especially on transparency and feedback loops, to enhance trust.

About the project

The Better Regulation for Better Health (BRBH) project is a multi-disciplinary study of how the European Union's Better Regulation agenda affects its health policies and governance. It is funded by UK Research & Innovation (UKRI) as part of a Future Leaders Fellowship, held by the project's principal investigator, Dr Eleanor Brooks. The project runs from 2021 to 2025 and is hosted within the Global Health Policy Unit at the University of Edinburgh's School of Social and Political Science. The survey was conceived and designed by the BRBH team at University of Edinburgh; the analysis presented in this report was conducted by the European Public Health Alliance.