

## EPHA's Analysis of the EBCP Implementation and Evaluation Review

On the 4<sup>th</sup> of February 2025, the European Commission published a [review](#) on the implementation of the evaluation of the Europe's Beating Cancer Plan (EBCP). The Plan, launched on the 3<sup>rd</sup> of February 2021, is a political commitment to combat cancer and with its 4 billion of euros for budget, is considered a building block of the European Health Union. The plan is structured around four main pillars, addressing the entire cancer pathway from prevention through post-cancer care. It also includes three cross-cutting themes: fostering new technologies, research, and innovation; reducing cancer inequalities; and putting childhood cancer under the spotlight.

Many of the actions announced in the Cancer Plan have been launched since its adoption. The implementation is monitored by the Commission in collaboration with Member States and stakeholders and is based on a health-in-all-policies approach. An Implementation Roadmap was published in November 2021 and has been updated twice since.

- **Initial Phase (2021-2022):** The initial focus was on setting up the governance structure, launching flagship initiatives, and securing Member State support.
- **Ongoing Implementation (2023-2024):** The focus shifted to implementing various actions across all pillars and cross-cutting themes.
- **Future Development:** The plan's actions are long-term in nature and will continue to evolve. The focus is now on implementing existing actions and addressing identified challenges rather than including new ones.

However, **key policy initiatives that we previously expected, have been strikingly removed from the implementation roadmap in 2024**, revealing not only significant delays in the evaluation, revision, and adoption of crucial public health policies but also a worrying absence of clearly defined outcomes and timelines, leaving the public health community uncertain about future developments. This is particularly worrying in the realm of prevention, considering it remains the most effective and cost-efficient long-term cancer control strategy, with approximately 40% of cancer cases in the EU being preventable. This concern is further heightened by the publication of the European Commission's 2025 workplan on February 12<sup>th</sup>, which fails to mention any of these critical policies.

The Plan aims to raise awareness of and address key risk factors of preventable cancers. In this document, the European Public Health Alliance (EPHA) reviews the original goals of the plan, their implementation, and ongoing work. Each of the key risk factors is addressed individually later in this document, providing a detailed analysis of the progress made and the challenges that remain. Please note that radiation is omitted from this analysis, as EPHA does not currently focus on this area.

As we reflect on the implementation of the EBCP, it's clear that this initiative has embarked on a comprehensive and ambitious journey to tackle cancer prevention across Europe. Despite the progress made, **EPHA review highlights areas where the promised policy outputs were notably delayed or not even mentioned**. This includes crucial delays and omissions in the areas of tobacco and alcohol control, which are vital for cancer and non-communicable disease (NCD) prevention. These shortcomings remind us that our work is far from complete.

EPHA remains steadfast in its commitment to ensuring that the EBCP not only maintains its scope but also enhances its impact. We must maintain an ambitious mindset to deliver on the promises made to secure a healthier future for all. As advocates and citizens, let's continue to push the boundaries of what is possible in public health to build a healthier Europe.

Members of EPHA, including the Association of European Cancer Leagues (ECL), European Respiratory Society (ERS), and International Federation of Anthroposophic Medical Associations (IVAA), have provided key feedback and inputs for this analysis.

## 1. Smoking

Tobacco consumption is the leading cause of preventable cancer, accounting for 27% of all cancers. Eliminating tobacco use could prevent nine out of ten cases of lung cancer.

### EBCP Goals:

- Achieve a Tobacco-free Generation by 2040, with less than 5% of the population using tobacco.
- Further develop measures to protect young people from tobacco and related products.
- Strengthen research into traditional and emerging tobacco products.

### What has been done:

- The Commission adopted Delegated Directive (EU) 2022/2100 on the withdrawal of certain exemptions for heated tobacco products.
- The EU tobacco traceability system was extended to include tobacco products other than cigarettes and roll-your-own tobacco.
- A Council Recommendation on smoke- and aerosol-free environments was recently adopted.
- The Tobacco Products Directive and the Tobacco Advertising Directive are currently being evaluated.
- The Commission is supporting Member States in implementing the Recommendation through EU funding programmes.

### Ongoing work:

- The evaluation of the **Tobacco Products Directive** and the **Tobacco Advertising Directive** will inform the next steps under the new Commission.
- The revision of the **Tobacco Taxation Directive** is ongoing.

### EPHA's feedback:

- While the goal of a tobacco-free generation by 2040 remains, there's no specific mention of concrete measures beyond recommendations and ongoing evaluations.
- The discussion around the revision of the Tobacco Taxation Directive lacks clear details and timelines. Furthermore, there is a critical need for a coherent revision of all related directives to enhance their impact on reducing tobacco use prevalence and uptake.
- No specific new measures to address the marketing and use of emerging tobacco products other than heated tobacco and e-cigarettes, despite concerns about their appeal to younger demographic.
- Data show that smoking rates are higher among populations with lower socioeconomic status. Hence, effective tobacco control measures can help reduce health inequities. Member States should be empowered to prohibit certain categories of tobacco products, such as novel non-medicinal nicotine products, to protect public health.
- The strategy to protect young people from tobacco and related products lacks development. Supporting Member States in exploring age-based bans on tobacco sales, ensuring no one born after a specified year can legally purchase tobacco, is crucial under Article 2.1 of the WHO FCTC.
- The European Commission should assume a more active role in supporting smoking cessation across the EU by establishing common frameworks, providing funding for cessation programs, and coordinating cross-border research and data sharing.

## 2. Harmful Alcohol Consumption\*

\*EPHA has consistently advocated against the use of the term “harmful alcohol consumption.” This phrase is deliberately vague and not easily quantifiable, suggesting the existence of a 'non-harmful' level of alcohol consumption. Such terminology poses significant challenges in policy implementation and the measurement of effectiveness. It directly contradicts the position of the International Agency for Research on Cancer (IARC), which states that “*there is no safe amount of alcohol.*” This ambiguous language supports an industry narrative that places the onus on individuals for their consumption choices and habits, such as heavy drinking among vulnerable groups, while minimizing the need for comprehensive regulatory measures at the population level.

Alcohol can cause at least seven types of cancer, including common ones like colorectal and breast cancer. Reducing alcohol-related harm is a major public health goal.

### EBCP Goals:

- Help Member States substantially reduce alcohol-related harm.
- Introduce health warnings on labels of alcoholic beverages.

### What has been done:

- The EVID-ACTION project, in collaboration with WHO Europe, is supporting Member States on health literacy, including warnings, screening and interventions related to alcohol.
- The Cancer Plan helps Member States implement best practices to reduce harmful alcohol consumption.
- The beers and spirits sectors have been implementing Memoranda of Understanding concerning lists of ingredients and nutrition declarations.

### Ongoing work:

- The evaluation of the **Alcohol Tax Rates Directive**.
- The revision of cross border purchases of alcohol.
- In 2025, the Commission is planning a **call to identify best practices** related to the prevention of NCDs, including alcohol-related harm.

### EPHA’s feedback:

- There is no mention of concrete actions or a timeline for the reduction of harmful alcohol consumption beyond supporting Member States.
- While there is a call for an evaluation of the Alcohol Tax Rates Directive, there are no specific details about changes or a timeline.
- The revision of rules governing cross-border purchases of alcohol products is mentioned, but there are no concrete actions or timeline for when this will be addressed.
- While there is a discussion of a need for health warnings on labels of alcoholic beverages, a proposal is pending, with no specific timeline or commitment.
- Although the plan mentions mandatory indication of the list of ingredients and the nutrition declaration on alcoholic beverage labels before the end of 2022, this deadline was not met.
- The plan also mentions health warnings on labels, part of the Food Information for Consumers (FIC) Regulation, before the end 2023, which was not met. The FIC regulation aims to enhance consumer information for healthier and more sustainable choices, but it appears to have faced delays and lacks specific next steps in recent updates

### 3. Obesity and Lack of Physical Activity

Unhealthy diets and physical inactivity heighten cancer risk. 16% of EU adults were living with obesity in 2019.

#### EBCP Goals:

- Reduce carcinogenic contaminants in food and set maximum levels for more contaminants.
- Explore tax incentives to increase the consumption of healthy foods.
- Improve consumer information and health literacy on nutrition.
- Address the marketing of products linked to cancer risks.
- Further support implementation of the Council Recommendation on physical activity.

#### What has been done:

- Maximum levels for some carcinogenic contaminants in food have been adopted.
- The Commission has worked with the WHO Europe to implement the Council Recommendation on promoting health-enhancing physical activity (HEPA).
- The HealthyLifestyles4All initiative aimed to promote healthy lifestyles.
- The Health Promotion Knowledge Gateway provides information on healthy diets and physical activity.

#### Ongoing work:

- A study examining the progress of the **EU Action Plan on Childhood Obesity 2014-2020** is expected to be published in 2025.
- The **review of Regulation (EU) No 1144/2014** is paused for the new Commissioner for DG Health and Animal Welfare to assess and consult with stakeholders.
- the European Commission is developing an **EU Action Plan for Plant-Based Foods** by 2026, which aims to strengthen the plant-based agri-food chains from farmers to consumers and is seen as a strategic move to promote sustainable and health-friendly dietary options

#### EPHA's feedback:

- There is no specific information about tax incentives to increase consumption of healthy foods.
- The review of the promotion policy for agricultural products has been paused and there are no alternative measures mentioned.
- While the plan aimed to improve consumer information and health literacy on nutrition, the report does not detail any new concrete steps to ensure consumer awareness.
- Although the plan mentioned addressing the marketing of products linked to cancer risks, no specific actions or timelines have been provided.
- We acknowledge the HealthyLifestyles4All initiative's role in promoting a holistic approach to health. As this initiative has concluded, we emphasize the need to expand holistic care models that integrate nutrition, physical activity, and mental well-being as crucial components of public health strategies to reduce cancer risks and enhance quality of life.
- The EU Action Plan for Plant-Based Foods aligns with global efforts to reduce meat consumption and increase the availability and attractiveness of plant-based foods. We hope that its potential impact on public health, particularly in reducing the prevalence of diet-related NCDs, including cancer, will be emphasized during the drafting process.

## 4. Exposure to Pollution and Hazardous Substances

Environmental factors contribute to about 10% of the cancer burden in Europe. Pollution and exposure to hazardous substances are significant risks

### EBCP Goals:

- Reduce premature deaths from air pollution by 55% by 2030 (compared to 2005 levels).
- Address pollution in water, air, and soil.
- Further improve protection of workers against work-related carcinogens.

### What has been done:

- The Zero Pollution Action Plan aims to reduce pollution.
- Ambient Air Quality Directives were revised.
- The Drinking Water Directive was recast.
- The Carcinogens and Mutagens Directive was amended, setting new occupational exposure limits for three substances.
- The EU Strategic Framework on Health and Safety at Work 2021-2027 was adopted.

### Ongoing work:

- The **2030 targets for pollution reduction** are already in place and being worked on.
- The **second Zero Pollution Monitoring and Outlook** will show progress and assess the perspective on achieving the 2030 pollution reduction targets.

### EPHA's feedback:

- Despite setting a target of reducing premature deaths from air pollution, the report does not specify any concrete additional actions beyond those already planned under the Zero Pollution Action Plan.
- While the report mentions improving the protection of workers, it does not detail specific new measures for implementation beyond the amendment of the Carcinogens and Mutagens Directive.

## 5. Cancers Triggered by Infectious Agents

Cancers caused by infections account for over 7% of all cases in the EU. Early detection, treatment, and vaccination are effective prevention tools

### EBCP Goals:

- Fully vaccinate at least 90% of the EU target population of girls against HPV by 2030.
- Significantly increase the vaccination of boys against HPV by 2030.
- Ensure access to vaccination against Hepatitis B.

### What has been done:

- The Commission supports Member States' efforts to expand routine HPV vaccination of girls and boys.
- A Council Recommendation on vaccine-preventable cancers was adopted.
- The PERCH Joint Action is developing communication strategies to support HPV vaccination campaigns.
- Projects like PROTECT EUROPE and ReThink HPV vaccination are promoting gender-neutral vaccination and focusing on countries with low vaccination uptake.
- The VH-COMSAVAC project is working on scaling up community-based HBV and HCV testing and vaccination models.
- The EUROHELICAN project is testing the feasibility of an H. pylori test and treat strategy.

### Ongoing work:

- A new **Joint Action on vaccine-preventable cancers** is expected to kick off at the end of 2025.

### EPHA's feedback:

- Although the plan sets a target to vaccinate at least 90% of girls against HPV by 2030, the report does not provide further details on specific actions to ensure that that this target is met and that vaccination uptake is increased for boys.
- While there was a commitment to ensure access to vaccination against Hepatitis B, there is no mention of any concrete actions in this area.