



EUROPEAN COMMISSION CALL FOR AN INITIATIVE ENTITLED 'A COMPREHENSIVE APPROACH TO MENTAL HEALTH'

COMMENTS BY GAMIAN-EUROPE

INTRODUCTION

The Global Alliance of Mental Illness Advocacy Networks-Europe (GAMIAN-Europe) is a not-for-profit patient-driven pan-European organisation, representing and advocating the interests and rights of persons affected by mental ill health. Its principal activities relate to advocacy, awareness-raising, education, partnership and capacity building.

GAMIAN-Europe was established in 1998 as it was felt that patients could and should play an effective and complementary role in developing positive and pro-active EU and national-level policies and other initiatives with an impact on mental health issues and services.

This document sets out our views in relation to the Commission's Call for Evidence for an initiative entitled 'A comprehensive approach to mental health'.

GENERAL COMMENTS

GAMIAN-Europe warmly welcomes the Commission's intention to specifically address mental health.

Over the last years, our organisation, along with several other leading networks active in the field of mental health, have **advocated for a dedicated and comprehensive EU-level Strategy** - backed up by the October 2019 Finnish Presidency Conclusions, calling on the Commission to come forward with a comprehensive EU Strategy on Mental Health - and we are happy to note that these efforts now have a positive response, with a clear promise for action. Needless to say, we still maintain that a **clear and dedicated Mental Health Strategy**¹ is required and therefore call on the Commission to ensure that the 'comprehensive approach' will be just that.

¹ For GAMIAN-Europe's proposal for a structure of an EU Strategy, see [GAMIAN-Europe's proposal for an EU Strategy for Mental Health](#)

While the precise content of the forthcoming Communication on mental health is of course still unknown, this consultation presents a useful opportunity to provide our views and play an active role in the process towards the development of this 'comprehensive approach to mental health'. We would like to call on the Commission to ensure that relevant stakeholders will **continue** to be actively involved with the further **development, implementation, monitoring and assessment** of the future initiative.

There are several general points that would need to be considered if a future initiative is to be relevant:

1.

The initiative should be based on the concept of **parity of esteem**, i.e., mental health having equal parity with physical health. There is no health without mental health - physical and mental health are two sides of the same coin.

2.

The initiative should **bring together and engage a variety of stakeholders** from the mental health area (patients, health professionals, service providers, carers...) as well as those with a different remit (youth, older people, families, women, employers/employees, vulnerable groups...)

3.

For any EU initiative to indeed be comprehensive and effective, it will need to be **part of the Commission's internal and formal structure** – in other words, it will need dedicated resources to ensure its development and implementation, both in terms of staffing as well as in terms of budget.

4.

The Commission could consider following the examples of other EU-level action, in the fields of cancer and rare diseases respectively; apart from EU-level action, these explicitly stimulated the **development of dedicated national action programmes** on these topics; this might be equally useful for mental health.

5.

The Call for Evidence's paper acknowledges that '*mental health is a determining factor in the effectiveness of EU policies as well as in the health, stability and prosperity of our societies*'. This is reflected in the stated aim of the initiative – i.e., to promote a 'comprehensive, prevention-oriented approach to mental health as a public health issue and **to mainstream mental health into EU policies**'. While GAMIAN-Europe welcomes the Commission's intention to take this 'mental health into all relevant EU policies' approach, **formal internal structures for cooperation, coordination and exchange** will need to be set up, to ensure this cross-cutting policy approach and outcome.

6.

It will be important to bear in mind the **huge differences between and within Member States** concerning mental health care and service provision systems, care models, access to care, culture, priorities.... A **‘one size fits all’ approach will not be successful.**

7.

While we wholeheartedly agree that a ‘prevention-oriented’ approach is important, we would like to underline that the **intention to focus on those that are already living with mental ill-health** should be explicitly addressed in the initiative’s overall aim as well.

8.

The initiative should take the **outcome of past EU actions on mental health into account**, such as the 2017 EU Framework for Action on Mental Health. Furthermore, it should be in line with the WHO Action Plan on Mental Health.

9.

Last but not least, the initiative should outline **clear and measurable objectives**, which should be assessed regularly and adapted if needed. The input of relevant stakeholders will be indispensable in this regard.

‘Investing in improving people’s mental health is not only about health; it is about ensuring that European society is citizen-centred, resilient and cohesive. The good mental health of the European population is a fundamental resource for social stability and economic prosperity, as well as for quality of life.’

Call for Evidence paper ‘A comprehensive approach to mental health, page 2

SPECIFIC COMMENTS²

A. Political Context

GAMIAN-Europe warmly welcomes the **variety of compelling statistics** listed in this section of the paper, which clearly make the case for EU-level action, such as:

- Prevalence (1 in 6 people in the EU affected by mental illness prior to the pandemic);
- The impact of mental health on the working population (around 5% of the working age population had a severe mental health condition, while a further 15% were affected by a more common condition);
- Mortality rates (4% of yearly deaths in Europe and the second most common cause of death among young people).

In addition, the impact of the COVID-19 pandemic - in general, and on particular population groups (young people, older people and vulnerable groups) -, the war in Ukraine and its consequences for the cost of living as well as uncertainty about the future, are underlined.

The Commission also lists several recent and current EU actions in the field of mental health. These are also relevant, and GAMIAN-Europe believes that these need to be brought under the umbrella of the new initiative to ensure a comprehensive and non-fragmented approach. In addition, and as stated above, we urge the Commission to revisit and build on the outcomes of previous EU activities in the field of mental health, such as the 2017 Framework for Action on Mental Health, which provides a useful overview of relevant policy recommendations.

The paper outlines a variety of policy areas where mental health should be considered such as employment, education, humanitarian aid, research and health. There are many other policy domains impacting mental health, such as human rights, social exclusion, equality and non-discrimination; digital society... Within this context, GAMIAN-Europe would also underline the recently adopted EU Care Strategy as this is addressing highly relevant issues concerning – formal and informal – long-term care provision, impacting those living with mental ill health.

B. What does the initiative aim to achieve and how?

A comprehensive set of workstreams is proposed...

The Call for Evidence paper proposes several potential workstreams for the future initiative, i.e.:

- Promotion of good mental health and prevention of mental health problems
- Early detection and screening of mental health problems
- Actions to further tackle psychosocial risks at work
- Support and improve access to treatment and care for mental health problems
- Improved quality of life, appropriate and patient-centred follow-up care, facilitating return to school and work, and advancing on key elements such as de-stigmatisation and rights.
- Cross-cutting issues, including research, development and innovation, the role of digital tools, training and support, including inter-disciplinary training for the health workforce

Each of these comes with an ‘inventory’ of issues that will be addressed – and indeed, it creates the impression of a truly ‘comprehensive’ approach.

The themes are all highly relevant – and strongly in line with those set out in -inter alia - GAMIAN-Europe’s 2021 discussion paper on a future European Year for Mental Health³, our 2018 Call to Action on Patient Empowerment⁴, and proposal for an EU Strategy on Mental Health⁵. Reports of meetings of the European Parliament Alliance on Mental Health, which we coordinate since its inception in 2009 confirm these priority themes

...but how will the Commission do justice to all of these?

However, contrary to its title, this section of the paper does not really address what will be achieved, nor how this will be done.

How will the Commission address this huge variety of relevant themes in a meaningful and equitable way and what will the desired outcome be? It may be necessary to prioritise, and if that is the case, how will this prioritisation be carried out? The Eurobarometer, planned for Spring 2023, may be helpful in this respect, the targeted consultations of stakeholders referred to in the paper may also contribute. But a clearer idea of where the initiative would be headed and where the emphasis would be a first requirement.

GAMIAN-Europe’s focus: equal access to treatment and care, patient involvement/empowerment, patient-centredness and quality of life.

While all workstreams will be important, for GAMIAN-Europe, as a patient organisation, the workstreams on ‘*Support and improving access to treatment and care*’ and ‘*Improved quality of life*’ are particularly relevant.

Again, we would strongly underline the need to specifically involve patients in the development, implementation, monitoring and assessment of these workstreams, as those with lived experience of mental ill health to ensure relevance.

What else should these workstreams address?

- Apart from the welcome focus on access to care, care provision (community as well as intramural) and support/treatment options, as well as on follow-up care, and all other themes referred to in the Commission paper, this workstream should also ensure attention for **patient-centredness, choice, empowerment and advocacy**.
- **Mental health literacy** - referred to under the workstream ‘Promotion of good mental health’ – should also feature in this workstream, as it will contribute to empowerment and resilience.
- As part of this work, a mapping of the state of mental health care across the EU could be considered, to identify care gaps as well as good practice, including innovative, effective approaches such as (youth) peer support.

³[GAMIAN Europe's Discussion paper EYMH](#)

⁴[GAMIAN-Europe Call to Action](#)

⁵[GAMIAN-Europe's proposal for an EU strategy for Mental Health](#)

- In this respect, it will also be vital to include the training of (mental) healthcare professionals. Developing and agreeing on EU training standards and curricula – as advocated by organisations such as the European Federation of Psychologists Associations and the European Psychiatry Association – could be a way forward. Related to this, the issue of recruitment and retention of staff – a problem faced by many Member States – should not be forgotten.
- **Informal carers**, providing the bulk of (long as well as short-term care) for people living with mental ill-health, should be addressed too; as referred to above, synergies should be sought with the recently adopted European Care Strategy.

Other issues:

- **Research** (listed under the workstream on ‘Cross-cutting issues’) into mental health care provision and treatment – already ongoing at the EU level and mentioned under ‘cross-cutting issues’ – should be continued and stepped up. The EU-funded ROAMER project, providing a list of agreed research priorities, could be revisited as a useful starting point.
- We would suggest for the themes of ‘destigmatisation and rights’ – currently part of the workstream ‘Improved quality of life’ – to be addressed as a cross-cutting issue as this is relevant across the various workstreams.

C. Better Regulation

- The Commission proposes several options for future consultation on the future initiative, such as addressing the Member States via the subgroup on the mental health of the Public Health ExpertGroup. GAMIAN-Europe would suggest expanding this subgroup and **involving relevant stakeholder groups**, to get the broadest and most relevant feedback and priority setting.
- The EU Health Policy Platform will also play a role in organising targeted consultations. However, it is not clear who will take the initiative for such consultations and what the procedure and ‘status’ of these will be.
- As far as the planned Spring Eurobarometer is concerned, will relevant stakeholders be involved with the definition of the questions?

CONCLUSIONS

Again, GAMIAN-Europe would like to warmly thank the Commission for this initiative. We will be happy to be involved with the further development and implementation of the initiative, in continued cooperation with other stakeholders.