

June 2023

COMMUNICATION FROM THE COMMISSION ON 'A COMPREHENSIVE APPROACH TO MENTAL HEALTH' (COM(2023) 298 FINAL)

Comments and suggestions by GAMIAN-Europe



Introduction

GAMIAN-Europe warmly welcomes the Commission Communication as it recognises the crucial importance of mental health as an 'integral part of health and well-being and as a precondition for an inclusive society and productive economy, going beyond individual or family matters'. Moreover, it is based on the notion of 'parity of esteem', i.e., mental health having equal parity with physical health. As the Commission rightly states, there is no health without mental health.

The Communication was developed against the background of the (aftermath of the) COVID-19 pandemic, the war in Ukraine, and climate change – all impacting mental health in different ways.

We strongly agree that beyond tackling these crises, addressing mental health challenges is key to boosting the resilience of individuals and the population.

This short document sets out our comments on the Communication as well as suggestions for EU action, building on GAMIAN-Europe's submission to the Call to Evidence[1].

The Communication contains many positive elements....

GAMIAN-Europe welcomes the Communication's three guiding principles, applying to all EU citizens, i.e.:

- Access to adequate and effective prevention
- Access to high quality and affordable mental healthcare and treatment
- Ability to reintegrate into society after recovery

Similarly, the **9 key themes**, providing the framework for concrete action by means of **20 related 'flagship initiatives'**, are positive- and highly relevant:

Integrating mental health across policies: we agree that a comprehensive approach must recognise the influence of biological, psychological as well as social and societal factors. It is not a matter of health- systems only. Existing societal inequalities must be addressed, taking a multi-sectoral and cross-policy approach.



Promoting good mental health, prevention and early intervention for mental health problems:

Early intervention can certainly ensure timely support and may prevent further deterioration of well-being and mental health in a variety of settings, addressing a range of health determinants and living conditions. The European Depression and Suicide Prevention initiative is commendable in this respect; likewise, the intention to step up research is essential and should lead to concrete and evidence-based action.

Boosting the mental health of children and young people: we agree that this is indeed a group where special attention is required (for them as well as for their parents), as they face mental health challenges which could shape their entire life and overall development, e.g., the risks of digital tools, anxiety related to climate change, cyberbullying...

Helping those most in need: we welcome the attention paid to vulnerable groups, such as older people, groups affected by gender-based violence and discrimination on the grounds of sexual orientation, refugees, people with disabilities, Roma and others

Tackling psychosocial risks at work: this is another important area where action is required as psychosocial risks and work-related stress are among the most challenging issues in occupational safety and health; moreover, new challenges to mental health are being faced (e.g., digitalisation, telework, the right to disconnect, work/life balance...). The Commission's concrete intentions to involve OSHA-EU are appreciated. In addition, GAMIAN-Europe is pleased to note the Communication's reference to the implementation of the European Care Strategy, which should envisage actions that contribute to the mental well-being of carers as well as those being cared for.

Reinforcing mental health systems and improving access to treatment and care: this theme is at the core of GAMIAN-Europe's mission and work. We note the reference to the 'right to affordable, preventive and curative care of good quality', as stipulated by the Pillar of Social Rights. Work under this theme includes activities to train the health workforce to improve skills and quality of care and to reduce stigma and discrimination. Last but not least, it refers to the need for data collection and monitoring, to have a better idea of inequalities with respect to access to early intervention, treatment and care. To address these needs, financial support at EU level will be mobilised to allow Member States to strengthen their capacity to act, shifting from institutionalised to community-based care.



Breaking through stigma: there is indeed a need to invest in improving awareness and understanding of mental health. The specific 'flagship initiative' to improve the quality of life of patients, their families and (in)formal carers is welcome.

Fostering mental health globally: The support to Ukraine is necessary and welcomed, as is the planned cooperation with the OECD and WHO.

EU funding for mental health: we agree that the 'budget to support mental health should match the magnitude of the challenge' and welcome the 1.23 billion that has been identified to finance activities directly or indirectly promoting mental health.

...but the Commission should also consider the following:

The main focus seems to be on prevention and mental health promotion. While there is a welcome key theme addressing access to treatment and care, prevention and health promotion seem to be the priority issues. If one in six European citizens (pre-COVID data) is living with a mental health problem, it would seem sensible – and fair - to make improving their situation and quality of life a central feature of any EU-level guided action on mental health.

For GAMIAN-Europe, any action under this heading should be guided by the notions of patient-centredness, choice, empowerment and easy/equal access to diagnosis, early intervention, treatment and care.

Actions to improve mental health literacy should also be part of the work under this theme, as this will contribute to empowerment and resilience, as well as to prevention and mental health promotion.

Mental health strategy or Commission inventory of actions?

Rather than a 'strategy', the Communication seems to be more of an inventory of ongoing EU-level actions with a (potential) bearing on mental health; there are not many new initiatives and the specified budget has already been spent in some cases.

While it is interesting and highly relevant to list these actions and specify how they can contribute to improving mental health across the EU, this approach risks being fragmented ('siloes').



GAMIAN-Europe, along with the European Parliament Alliance on Mental Health and several other stakeholders, have been calling for a true and comprehensive Strategy, which would bring all elements put forward in the Communication together.

The need for a dedicated internal Commission structure

Related to the above, a true 'Mental Health in All Policies' approach merits a dedicated and structural resource inside the Commission. For this EU initiative, with so many elements spread across the various Commission DG's, to be 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.

The need for dedicated national action programmes on mental health

For the initiative to be effective while taking the disparities between the EU Member States into account, the Commission should consider the development of dedicated national action programmes on mental health.

The recommendations to Member States contained in the Communication – specified at the end of each of the 9 themes – would provide a useful framework for such actions. There are precedents at the EU level, in the fields of cancer and rare diseases respectively; these have effectively stimulated national-level action on these topics and led to concrete change.

How will stakeholders – mental health and beyond – be involved?

It is not clear how the Commission intends to involve and bring together stakeholders – both from the area of mental health and beyond - in the implementation and assessment of the approach. The only initiative specifically mentioned is the EU Code on mental health; this is described as a set of evidence-based recommendations to empower people experiencing mental health issues to take better care of their own and their families and carers' mental health. How will this be developed and what it will entail remains unclear.

How to measure success and progress?

The initiative should outline clear and measurable objectives and markers, which should be assessed on a regular basis and adapted if needed. The input of relevant stakeholders will be indispensable in this regard.



What about past EU actions on mental health?

Surprisingly, the Communication does not have any reference to earlier explicit work on mental health, such as the 2017 EU Framework for Action on Mental Health. This could provide a useful framework for an overall and holistic strategy.

ALL patients living with a chronic health condition should be considered vulnerable

While we fully agree with the importance of special attention for vulnerable groups, it does not seem reasonable to single out cancer patients.

GAMIAN-Europe maintains that all people living with a chronic or life-threatening disease (including rare diseases should be considered vulnerable. On another note, there is no mention of the topic of co-morbidities and mental health.

The need to increase awareness of mental health

The Commission highlights the need for actions to increase awareness on mental health, as a means to reduce stigma, take away barriers to seeking help and support resilience.

A dedicated European Year of Mental Health – as also advocated by the European Parliament and many other stakeholders - could be very helpful as an EU-wide and visible awareness campaign.

Conclusions

While GAMIAN-Europe is delighted to note that some of our issues and suggestions, as listed in our submission to the January 2023 Call for Evidence paper, have been taken on board by the Commission, several issues merit further attention. The Commission's obvious interest in and return to specific attention for mental health – rather than viewing mental health as part of the overall chronic disease agenda – is a reason for optimism.

GAMIAN-Europe would therefore like to warmly thank the Commission for this initiative and looks forward to being involved with the further development and implementation of the initiative, in continued cooperation with other stakeholders.





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The Voice of Patients in Mental Health

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