



# **POLICY BRIEF**

**1/2024**

Evaluation of the European  
Commission's Communication  
on comprehensive approach  
to mental health

**Michael CARDAL**

Progresivní  
analytické  
centrum

**PAC**

**JANUARY 2024**

# POLICY BRIEF

In June 2023, the European Commission (EC) adopted a long-awaited document entitled „*Communication on a comprehensive approach to mental health*“. This document is supposed to be the basic building block of the European Union’s approach to the worsening mental health epidemic, which has been amplified by the onset of the Covid-19 pandemic and other crises that we as Europe have gone through in recent years and are still going through. (European Commission, 2023)

Since its publication, the Communication on a comprehensive approach to mental health has become a frequently discussed topic in the field of combating mental health. The main task of this research is to analyse the positions of some actors in relation to this communication and to summarize their positions or objections.

One of the actors that responded to the Communication on a comprehensive approach to mental health was the **Coalition for Mental Health and Wellbeing**, which brings together MEPs from different political groups who focus on the issue of mental health. In its statement, the coalition praised the communication’s emphasis on socio-economic and environmental determinants of mental health problems. The coalition also pays increased attention to the part of the Communication that, in relation to mental health problems, mentions promotion, prevention, early interventions, addressing stigma and ensuring social inclusion people living with mental health problems. The coalition also praised the emphasis on supporting people in vulnerable situations who are disproportionately impacted by mental health problems, including children and young people, people in rural areas, older people, the LGBTQ community and people with disabilities. On the other hand, the coalition criticized the fact that the communication does not mention in any way the

evaluation of national health services’ capacity to address mental health. Likewise, the Coalition was dissatisfied with the lack of references in the EU’s plans to create a long-term European strategy for mental health. (Coalition for Mental Health and Wellbeing, 2023)

**EuroHealthNet**, a non-profit organization specializing in the health sector as a whole, acknowledged the European Commission’s Communication as an important first step towards a unified European policy to combat the mental health crisis. EuroHealthNet, like the previously mentioned actor, especially praised the multidimensional approach to the problem or the appeal for help to the most affected groups of the population. However, EHN recommended setting more specific goals and targets, including a clear timeline under a unified framework for action, where achievements – or the lack thereof – are measured and learned from. (EuroHealthNet, 2023)

Another important actor in the field of mental health, which provided its opinion on the Communication of the European Commission, is the non-governmental organization **Mental Health Europe** (MHE). Of all the actors discussed, MHE is the most critical of the Communication. In its statement, the organization first summarizes its previous recommendations, including the creation of a comprehensive European initiative or strategy on mental health with a clear timeline, adequate budget, objectives, as well as indicators to monitor progress. MHE further argues that a similar vision was supported by representatives of both civil society and the Council of the European Union and the European Parliament. However, according to the MHE, the resulting communication is not a strategy, nor does it represent a plan for how the EU should fight the mental health crisis in the long term. According to MHE, the presented flagship initiatives are of a short-term character, which is

why the European Union still lacks a long-term plan or strategy regarding the topic of mental health. Furthermore, MHE considers the communication of the European Commission to be a necessary first step, which, however, must be followed by European initiatives and strategies of a long-term character. (Mental Health Europe, 2023)

The last actor whose position we will mention in this document is the non-profit organization **GAMIAN-Europe**, representing the rights and interests of people suffering from mental health problems. In its response to the EC Communication, GAMIAN-Europe positively evaluates the principles of access to adequate and effective prevention, access to high quality and affordable health care related to mental health problems, and appeals to the ability of individuals to reintegrate into society. The organization also praised, among other things, the EU budget dedicated to the fight against the mental health crisis or the effort to help the most vulnerable groups of the population. As far as criticism is concerned, the positions of GAMIAN-Europe correspond well with the positions of the previously mentioned actors. The organization does not consider this communication to be a comprehensive strategy to combat the mental health crisis and calls, among other things, for clearer measurement of success and progress. Furthermore, according to the organization, it is not clear from the communication how the European Commission intends to include all actors in the implementation and evaluation of the proclaimed approach. Finally, GAMIAN-Europe criticizes the fact that the communication does not mention the topic of comorbidity in relation to mental health. (GAMIAN-Europe, 2023)

When we summarize the opinions of the three actors mentioned above, we come to the fact that they more or less agree on several things:

1. *The European Commission's Communication is a necessary and good first step, but its content cannot be considered a comprehensive **European-wide strategy** to fight the mental health crisis, nor can it be taken as a final solution to this crisis. The European Commission should consider its Communication a well-laid foundations and present **concrete initiatives** that will contribute to the final solution.*
2. *Although the European Commission's Communication heads in the right direction, most of the mentioned steps and initiatives are*

*of a short-term character. For an effective solution to the current situation, we need **long-term solutions**, which are, however, not present in this Communication. (Mental Health Europe, 2023)*

3. *The Communication correctly approaches the issue of mental health from a **multidimensional perspective**. It lists the most vulnerable population groups well and calls for the inclusion of mental health in **all sectors of public policies**, both at the European level and at the level of national states.*
4. *The Communication, despite the positives mentioned earlier, does not attach sufficient weight to the so-called new or **digital technologies**, which, according to many researches, have an absolutely **key influence** on the worsening mental health of young people in particular, who can be considered one of the most vulnerable groups (Herrera et al., 2023). The overuse of social networks, for example, has a tremendous impact on the mental health of young people, which causes, among other things, a feeling of alienation in young people. The communication does not sufficiently address this very important area of the causes of the current mental health crisis, despite the increasingly intense public and professional discussion about the negative effects of digital technologies and media. (Herrera et al., 2023).*
5. *Similarly, the communication does not mention addictions as a whole. For many years, researches have been confirming the strong connection between mental health problems and so-called **traditional addictions** for many years. According to a survey published as early as 1990, 32 % of people with a mood disorder also struggle with a substance use disorder. Of individuals with lifetime major depression, 16 % were addicted to alcohol and 18 % were addicted to drugs. However, the numbers are the worst among people suffering from bipolar disorder – a full 56 % of them suffer from a substance use disorder. It is therefore a question why the important topic of so-called traditional addictions and their effects on mental health is not sufficiently mentioned in the EC Communication on a comprehensive approach to mental health. (Regier et al., 1990)*

**Michael Cardal**

# SOURCES

1. COALITION FOR MENTAL HEALTH AND WELLBEING. *Reaction to the European Commission's comprehensive approach to mental health*. Mental Health Europe, June 13 2023 [quoted 2024-07-01]. Available at: <https://www.mhe-sme.org/the-european-parliament-coalition-for-mental-health-and-wellbeing-reacts/>
2. EUROHEALTHNET. *EU's significant first step towards a comprehensive approach to mental health and a building block of the European Health Union*. EuroHealthNet, June 20 2023 [quoted 2024-07-01]. Available at: [https://eurohealthnet.eu/wp-content/uploads/publications/2023/230620\\_statement\\_mentalhealthinitiative.pdf](https://eurohealthnet.eu/wp-content/uploads/publications/2023/230620_statement_mentalhealthinitiative.pdf)
3. EUROPEAN COMMISSION. *A comprehensive approach to mental health: Communication from the Commission*. European Commission, June 6 2023 [quoted 2024-07-01]. Available at: [https://health.ec.europa.eu/publications/comprehensive-approach-mental-health\\_en](https://health.ec.europa.eu/publications/comprehensive-approach-mental-health_en)
4. GAMIAN-Europe. *Communication from the Commission on 'A Comprehensive Approach to Mental Health' (com(2023) 298 final: Comments and suggestions by GAMIAN-Europe*. GAMIAN-Europe, June 2023 [quoted 2024-07-01]. Available at: <https://www.gamian.eu/wp-content/uploads/GE-response-to-comprehensive-approach.pdf>
5. HERRERA, Peco, *Invencción Fernández-Quijano a Carlos Ruiz-Núñez. The Role of Social Media as a Resource for Mental Health Care*. *European Journal of Investigation in Health, Psychology and Education*, June 10 2023 [quoted 2024-07-01]. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10297428/pdf/ejihpe-13-00078.pdf>
6. MENTAL HEALTH EUROPE. *Analysis of the Communication from the European Commission on 'A Comprehensive Approach to Mental Health'*. Mental Health Europe, July 3 2023 [quoted 2024-07-01]. Available at: <https://www.mhe-sme.org/wp-content/uploads/2023/07/Analysis-of-the-Communication-on-mental-health-FOR-WEBSITE.pdf>
7. REGIER Darrel A., Mary E. Farmer, Donald S. Rae, Ben Z. Locke, Samuel J. Keith, Lewis L. Judd, Frederick K. Goodwin. *Comorbidity of Mental Disorders With Alcohol and Other Drug Abuse Results From the Epidemiologic Catchment Area (ECA) Study*. *JAMA*, November 21 1990 [quoted 2024-07-01]. Available at: [https://www.researchgate.net/profile/Darrel-Regier/publication/293653366\\_Comorbidity\\_of\\_Mental\\_Disorders\\_With\\_Alcohol\\_and\\_Other\\_Drug\\_Abuse\\_JAMA\\_-\\_1990/links/56ba4a3a08ae6a0040ade919/Comorbidity-of-Mental-Disorders-With-Alcohol-and-Other-Drug-Abuse-JAMA-1990.pdf](https://www.researchgate.net/profile/Darrel-Regier/publication/293653366_Comorbidity_of_Mental_Disorders_With_Alcohol_and_Other_Drug_Abuse_JAMA_-_1990/links/56ba4a3a08ae6a0040ade919/Comorbidity-of-Mental-Disorders-With-Alcohol-and-Other-Drug-Abuse-JAMA-1990.pdf)

---

**Progressive Analytical Centre** is an independent think-tank providing evidence-based solutions and proposals for progressive policy-making. The Centre supports the exchange of views between experts, interdisciplinary dialogue, and engagement with the general public both in the Czech Republic as well as in the European Union. It contributes to improving our understanding of key social, political, and economic trends through critical analysis, policy-oriented research, and awareness-raising. Among the main research and analytical interests belong to the future of the European economy and industry, climate change and energy policy, social justice, international solidarity, security, and societal resilience. The Centre is based in Prague and launched its activities in 2021.

*Progresivní analytické centrum, o. p. s.* is a legal person - a public benefit corporation established in accordance with the law of the Czech Republic, Person Identification Number: 03527531, with its registered office at Salvátorská 931/8, Staré Město, 110 00 Praha 1, Czech Republic, registered in the Register of Public Benefit Corporations maintained by the Municipal Court in Prague, Section O, Insert 1361.



***Progressivní analytické centrum, o. p. s.***  
*<https://progresivnicentrum.eu/>*

**JANUARY 2024**