

EPHA Responds to consultation on EU Anti-racism Action Plan 2020-2025

The European Commission is developing a post-2025 EU Anti-racism Action Plan (EU ARAP), one of the first initiatives announced by President von der Leyen to advance a Union of Equality as outlined in her political guidelines. In preparation for this new EU ARAP, the Commission conducted a targeted online stakeholder consultation to reflect on the lessons of the past five years. Based on the work done through the '[DisQo Stakeholder Network: anti-discrimination and health equity](#),' in cooperation with the United Nations Office of the High Commissioner for Human Rights (OHCHR) Regional Office for Europe, the European Public Health Alliance has provided a detailed response based on crucial considerations on anti-racism, anti-discrimination and health equity.

EPHA's response is structured around a series of civil society consultations conducted by DisQo – one in [June](#) and one in [November](#) – and a [report with recommendations](#) already handed over to the Commission. Crucially, these recommendations are informed by civil society organisations, communities and individuals representing marginalised groups directly. They cover health specifically but are highly relevant for all other sectors, and to the design, monitoring and evaluation of the Action Plan. In its first part, the consultation covered the **design of the EU Anti-racism Action Plan 2020-2025** with targeted questions on specific topics. The second part focused on the **lessons learned**, ending with **conclusions** on the main recommendations.

EPHA's detailed input and recommendations can be found in the [complete survey response](#).

Some of the main reflections and recommendations are listed here for convenience:

- **Coordination:** The **Commission's Coordinator on combating racism** provides an important and connecting role; its position should be strengthened.
 - **Fragmentation** among the Union of Equality Strategies should be **counteracted**, potentially through an **overarching EU ARAP** strongly linked to specific strategies (e.g. the Roma Framework or Gender Equality Strategy).
 - The **removal of the dedicated Commissioner for Equality** is detrimental to the Commission's ability to address equality in Europe and **should be reversed**.
- **Effectiveness:** The EU ARAP has shown its effectiveness through the fact that it has led to a number of **national Action Plans against racism**, as well as **new European funding opportunities** to drive work and research on racism and discrimination (e.g. Horizon Europe and CERV).
- **Design and monitoring:** The EU Anti-racism Action Plan, other Union of Equality Strategies and their national equivalents would be more effective if of a **binding nature**, including **clear sectoral objectives** supported by **indicators** and **equality data collection** for monitoring purposes.
- **Data collection:** It is positive that the European Commission encourages the use of the **OHCHR Human Rights-based Approach to Data**. However, it should be **further integrated** in the EU ARAP through **guidance, implementation** and **funding** on the national level.
 - **Good practices** of promising data collection efforts on the national level include the [Dutch G4 Dashboard on discrimination](#), and the [community-led data collection initiative German Afrozensus](#).

- **Member States:** Equality strategies are only as strong as the countries that drive them; **political will** of Member States is crucial and can be encouraged through their **active involvement** and **more high-level representation** in EU spaces on anti-racism and anti-discrimination.
- **Civic space:** Recent **budget cuts** on the EU (e.g. €1 billion cut on EU4Health) and national level (recently in the Netherlands) have led to a decreasing civic space, with a particularly large effect on **smaller grassroots organisations**.
 - These budgets should be restored and increased, especially keeping in mind how **increased polarisation** exposes civil society to **increased violence**.
- **EU Funding Programmes:** Funding for anti-discrimination and anti-racism work is very **competitive**, limiting accessibility, especially when combined with **co-funding rates**.
 - **Direct support** in accessing funding or more effective **sub-granting schemes**, the **removal of co-funding rates** and more **long-term funding opportunities** will improve access to EU funding, **especially for smaller organisations**.
- **Mainstreaming:** Anti-racism and anti-discrimination, as well as social inclusion, need to be **explicitly mainstreamed** across EU policy.
 - the **Taskforce for Equality should be strengthened** to be able to support this process.
- **Intersectional:** While the Union of Equality Strategies adopt an intersectional approach, **their comprehensiveness varies**; they should all be strengthened to meet a consistently high standard.
 - The specific sectoral breakdowns (e.g. health, housing, employment, education) require **clear objectives** and **indicators**, supported by **data collection**.
- **Health:** Health in the EU ARAP received only **limited attention**, with a brief mention of health inequalities during COVID and the Comprehensive Approach to Mental Health. Combined with a limited coverage of other sectors (education, employment etc.) the **understanding of social determinants** in relation to racism and discrimination **has fallen short** and should be expanded.
 - On health, the EU ARAP should be strengthened particularly based on **recommendation number 6** from the [DisQo Stakeholder Consultation Report](#).

EPHA and the DisQo Stakeholder Network have been providing input from the health perspective on the EU Anti-racism Action Plan and will continue to do so as the post-2025 plan takes shape. In doing so, it tries to ensure that the voices of affected communities stand at the center of that process. As the Union of Equality Strategies are developed, civic space should be open to incorporate these voices. They should be developed in close cooperation with the communities and individuals they impact, with a focus on concrete action on the ground that drives long-term change.

Questions or comments? Feel free to get in touch with us.

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