

User type Non-governmental organisation (NGO)  
Organisation European Public Health Alliance  
Organisation size Small (10 to 49 employees) Transparency register number [18941013532-08](http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.d?id=18941013532-08&locale=en) (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.d?id=18941013532-08&locale=en>).  
Country of origin Belgium

## Feedback

The European Public Health Alliance (EPHA) is the leading European public health CSO with about 50 members across Europe. It recognises the Better Regulation Frameworks potential to secure the quality, independence and transparency of evidence used in policymaking, including appropriate safeguards against conflicts of interest.

Drawing on its long-standing engagement with the Better Regulation Framework and its Better Regulations for Better Health Toolkit, EPHA highlights key barriers and enablers to effective implementation.

Regarding objective 1, enable evidence-based, swift and decisive EU action, EPHA cautions that where accelerated or exceptional procedures are used, speed should not come at the expense of transparency, evidence quality, or meaningful participation. Otherwise, simplification risks evidence dominance by well-resourced actors. Civil society's unpredictable and shrinking funding and membership base constrain its ability to contribute sustained and specialised expertise. The recent removal of the EU4Health Operating Grants has significantly undermined participation of independent public-interest voices in decision-making. Ensuring long-term and stable funding for (health) CSOs is essential to maintain a robust and independent evidence base that supports timely and effective EU action.

Objective 2, make the consultation system smarter, should improve quality and usability without reducing opportunities for participation or the range of voices heard, which would increase risks of stakeholder fatigue and disengagement. Fragmented consultations, short timelines, and limited feedback on how inputs are used reduce effectiveness by undermining stakeholders' capacity and incentives to engage meaningfully.

Counteracting this requires stable CSO funding, transparency on how input was used, clear post-consultation summaries, earlier engagement with longer deadlines, and formats proportionate to the scope of initiatives. Structured and continuous engagement with established civil society platforms, as well as scientists and universities could further improve efficiency and quality of input.

On objective 3 simplicity by design, EPHA has previously called for simplification in complex consultation procedures where administrative complexity did not clearly add value to policymaking. Simplification should focus on administrative and procedural design and must not narrow policy ambition, limit the scope of evidence considered, or reduce stakeholder diversity, particularly among civil society. Better Regulation should also consider the health, social, and economic costs of policy inaction or delay, particularly where preventive action could reduce long-term burdens. The aim should always be to ensure opportunities that secure participation of the most impacted groups. Participation should be meaningful, inclusive, user-centred, and diverse, with particular attention to marginalised, vulnerable, and grassroots organisations, moving beyond a tick-box approach and strengthening legitimacy. While recognising the scope of this consultation,

EPHA notes that the effectiveness of the Better Regulation Framework is closely linked to the broader environment for civil society participation, including: 1. consistent, multi-year funding allowing CSOs to retain staff, institutional knowledge, and continuous engagement, to ensure a level playing field; 2. broader protection of civil space, including against smear campaigns, SLAPPs, legal intimidation and threats; 3. stronger feedback loops through summaries to legitimise participation; communicate back to stakeholders on how their input was considered, publish outcomes, and provide clarity on selection and representation in events; 4. ensuring multilingual materials, accessible formats, travel support and other practical enablers to participation; 5. provide training and resources to strengthen CSO capacity to participate.

[All feedback](#)

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