



18 June 2021

European Centre for Disease Prevention and Control
By email

Dear Director Dr. Andrea Ammon,

Thank you for the leadership and hard work of the European Centre for Disease Prevention and Control (ECDC) staff in the management of the COVID-19 pandemic.

We are writing to you to express our concerns regarding the risk of delay and exclusion of many vulnerable groups in accessing a COVID-19 vaccine as part of national vaccine deployment strategies. These include people experiencing homelessness or living in precarious conditions, those without residence or with irregular migration status (such as refugees, asylum seekers, and undocumented migrants), persons with disabilities (whether physical, sensory, intellectual or psychosocial disabilities) and their support network, including personal assistants, interpreters and family carers, prisoners, Roma, ethnic minorities, and sex workers. Many of those are population groups that have already been disproportionately affected by the COVID-19 pandemic, experiencing significant morbidity and mortality. At the same time our member organisations report to us that preliminary studies find exceptionally high vaccine hesitancy rates in the same groups (e.g. Roma or migrants).

We recently sent a [letter](#) to Commissioners Stella Kyriakides, Helena Dalli and Nicolas Schmit on this topic, outlining a 12-point action plan on how underserved populations need to be included and prioritised in the national vaccination strategies¹. We therefore call upon the European Centre for Disease Prevention and Control (ECDC) to take action in the monitoring of the vaccine distribution within EU Member States,² and recommend the following:

- 1) The ECDC should monitor health inequities and conduct research on long-standing health inequalities, with a view to improving access to the Covid-19 vaccines and to healthcare, for vulnerable communities.
- 2) In order to track vaccine uptake and facilitate exchanges between national vaccination committees, the Agency should engage with EU Member States to collect data on the vaccine deployment to hard-to-reach populations and facilitate exchange of best practices among public health authorities in the Member States on these issues.

¹ Letter to the European Commission, “EPHA leads calls for a 12 point plan for vaccine equity in the EU”
<https://epha.org/epha-leads-calls-for-a-12-point-plan-for-vaccine-equity-in-the-eu/>

² Reducing COVID-19 transmission and strengthening vaccine uptake among migrant populations in the EU/EEA,
<https://www.ecdc.europa.eu/en/publications-data/covid-19-migrants-reducing-transmission-and-strengthening-vaccine-uptake>



- 3) Action-driven strategies should be supported by the collection of disaggregated data and by the development of simple and relevant equity-related indicators, in order to provide consideration for intersecting factors that may place certain groups in the high-risk category.
- 4) We encourage the ECDC to issue guidance accordingly, on integrative and population-adapted health emergency preparedness and response during the COVID-19 pandemic, while considering its relevance for future public health crises and crisis response.
- 5) Promote civil society and community involvement in monitoring, guidance development and support the exchange of knowledge and experience.

We recognise the ECDC's internal expertise in vaccine deployment monitoring and have followed its recent outputs in this area,³ as well as in the identification of vulnerable populations along with the barriers met by them to accessing healthcare.⁴ Important work addressing health inequalities and healthcare access for vulnerable communities⁵ has also been carried out by the agency in the past indicating your understanding and sensitivity towards these population groups.

We therefore believe it is crucial also in this case in response to COVID-19 that the ECDC takes a leading role to strengthen the collaboration among national health authorities, to carry out proper analysis of the vaccine uptake within the EU by all population groups and to provide the related guidance.

EPHA and its members are always available to provide feedback and be of assistance on the ground and beyond and we look forward to further dialogue with you on this issue.

Yours sincerely

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European Public Health Alliance

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Director General
European Public Health Alliance

³ Technical report "Rollout of COVID-19 vaccines in the EU/EEA: challenges and good practice", ECDC, March 2021, <https://www.ecdc.europa.eu/en/publications-data/rollout-covid-19-vaccines-eueea-challenges-and-good-practice>

⁴ Technical report "Guidance on the provision of support for medically and socially vulnerable populations in EU/EEA countries and the United Kingdom during the COVID-19 pandemic", ECDC July 2020, <https://www.ecdc.europa.eu/en/publications-data/guidance-medically-and-socially-vulnerable-populations-covid-19>

⁵ <https://www.ecdc.europa.eu/en/migrant-health>, <https://www.ecdc.europa.eu/en/immunisation-vaccines/vaccine-hesitancy>



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About the European Public Health Alliance

The European Public Health Alliance (EPHA) is a change agent – Europe's leading NGO advocating for better health. We are a dynamic member-led organisation, made up of public health NGOs, patient groups, health professionals, and disease groups working together to improve health and strengthen the voice of public health in Europe. Our mission is to bring together the public health community to provide thought leadership and facilitate change; to build public health capacity to deliver equitable solutions to European public health challenges, to improve health and reduce health inequalities.