

**To members of the Horizontal Working Party on Drugs (HDG)**

**CC. European Commission and Council of the European Union**

10 December 2025

**Subject: Joint sign-on letter on evidence-based, health- and rights-centred EU drug policy**

Dear HDG colleagues,

The International Drug Policy Consortium (IDPC), alongside 83 society and community organisations, are writing regarding the proposed '[EU Drug Strategy](#)' and '[Plan of Action on drug trafficking](#)' published by the European Commission on 4 December 2025. We have serious concerns regarding some aspects of the Strategy, as well as the decision, by the European Commission, to propose a Plan of Action exclusively focused on combatting drug trafficking and organised crime.

**We urge EU Member States to only adopt the proposed Strategy and Action Plan once they have been reviewed in a way that preserves the central role of health, harm reduction and human rights in the European approach to drugs.**

### **Reprioritising harm reduction**

Back in 2021, civil society had welcomed the [2021-2025 Drug Strategy](#)'s new strategic pillar on harm reduction, alongside other priorities. This time around, the European Commission decided to structure the new Strategy under the headings of preparedness, health, security, harm, international cooperation, and EU coordination and partnerships. Problematically, instead of including harm reduction ('Strategic priority 7: Reduce individual drug-related harm') in the 'Health' pillar of the strategy alongside prevention, treatment, recovery and reintegration, the Strategy relegates it to the 'Harm' pillar, alongside a number of unrelated supply-side matters that notably include the recruitment of minors in drug trafficking and the environmental harms of drug cultivation and production - topics that would best sit in the 'Security' section.

**Harm reduction is an [essential component](#) of the right to health**, and has been promoted by EU institutions, in particular the European Union Drugs Agency, for decades as an evidence-based approach that can effectively reduce health-related risks and harms for people who use drugs. Prioritising harm reduction is particularly critical right now, as the EU Drug Strategy itself reports a devastating 7,500 drug use-related fatalities in 2023 alone.

**Moving harm reduction away from the 'Health' pillar of the Strategy is not only a conceptual error, it also conflates different types of 'harms' which risks deprioritising this essential aspect of drug policy.** On the ground, this may have serious consequences in terms of programming and funding, and lead to more preventable harms and deaths.

**We call on EU Member States to insist that the strategic priority 7 'Reduce individual drug-related harm' is placed in the 'Health' pillar of the Drug Strategy.**

## **Ensuring a comprehensive and balanced Action Plan**

The European Commission's decision to adopt an Action Plan exclusively focused on combatting 'drug trafficking' is a major departure from the tradition of the EU to adopt a Strategy and accompanying Action Plan covering all aspects of drug policy. This is deeply problematic as it will inevitably result in a **complete imbalance towards supply reduction** in drug policies, with a de facto deprioritisation of the aspects of the Drug Strategy not relating to security. At the same time, evaluating effectiveness and conducting regular reviews of the Strategy would be extremely difficult without any clear commitments, actions or indicators to monitor and evaluate progress in implementation.

**We call on Member States to reject the Plan of Action proposed by the Commission, and adopt instead a new Plan of Action that covers the entirety of drug policy issues, including concrete commitments and actions for Member States to undertake, accompanied by indicators grounded in human rights, social cohesion, health and safety, aligned with UN human rights guidance and the Sustainable Development Goals, and with a clear timeline for an evaluation and review of the Strategy and Plan of Action.**

## **Promoting a rights-based approach to all aspects of drug policy**

While the current Strategy mentions human rights and high-level political documents on drugs, it fails to explicitly mention critical human rights guidance which was included in the previous Drug Strategy and should serve as a framework for EU drug policy - including the [International Guidelines on Human Rights and Drug Policy](#), the [UN System Common Position on drugs](#) and the [Universal Declaration on Human Rights](#).


In addition, the 'Security' pillar of the Strategy omits any mention of human rights, even though evidence now [abounds](#) on the devastating human rights impacts of many supply reduction strategies, both within the EU and globally. This pillar should be enshrined in a strong human rights approach, drawing on the recommendations provided in the landmark [2023 report](#) of the Office of the United Nations High Commissioner for Human Rights (OHCHR).

Furthermore, the 'Security' pillar of the Strategy fails to reflect on the inability of drug law enforcement approaches to curb the illegal drug market and related violence. The EUDA itself [reports](#) increases in use and trafficking, while the levels of violence associated with illegal drug markets have become a major concern. And yet, this pillar promotes more of the same, instead of opening the door for more dialogue and opportunities for innovative approaches.

**We urge EU Member States to 1- reincorporate key references to international human rights guidance in the Strategy; 2- rebalance the Security pillar of the Strategy to ensure that all aspects of EU drug policy are enshrined in a human rights approach, drawing on the recommendations of the OHCHR; and 3- include a strategic priority on policy innovation, to offer Member States the possibility of trialling alternatives to criminalisation and punishment.**

The European Union has long advanced a balanced, integrated and rights-oriented approach to drug policies. We urge Member States to ensure that the Union continues to support this balanced approach for the years to come.

Yours sincerely,



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Executive Director, International Drug Policy Consortium

**On behalf of:**

1. Agência Piaget para o Desenvolvimento – APDES (Portugal)
2. AIDES (France)
3. Akzept e.V. (Germany)
4. Asociación Bienestar y Desarrollo (ABD) (Spain)
5. Association for Humane Drug Policy (Norway)
6. Association of Addictology Service Providers - APAS (Czechia)
7. Associazione Luca Coscioni (Italy)
8. Belgian Network of People who Use Drugs - BeNPUD (Belgium)
9. Bruss’Help (Belgium)
10. Chill out e.V. (Germany)
11. Confederación de federaciones de Asociaciones Cannàbicas - ConFAC (Spain)
12. Consorzio Sociale Abele Lavoro S.C.S. - Impresa Sociale (Italy)
13. Coordinamento Nazionale Comunità Accoglienti - CNCA (Italy)
14. Correlation-European Harm Reduction Network (Netherlands)
15. Drogenarbeit Z6 (Austria)
16. Drug Policy Network South East Europe (regional)
17. Drug Science (United Kingdom)
18. Estonian Association of People Using Psychotropic Substances “LUNEST” (Estonia)
19. Eurasian Harm Reduction Association - EHRA (Lithuania)
20. European AIDS Treatment Group - EATG (regional)
21. European Coalition for Just and Effective Drug Policies - ENCOD (regional)
22. European Federation of the National Organisations working with the Homeless – FEANTSA (regional)
23. European Network of People who Use Drugs (regional)
24. European Sex Workers’ Rights Alliance (regional)
25. Ex Aequo asbl (Belgium)
26. Fédération Addiction (France)
27. Fédération bruxelloise des institutions spécialisées en matière de drogues et addictions (féda bxl)
28. Finnish Association for Humane Drug Policy (Finland)
29. Fondazione LILA Milano ETS (Italy)
30. Forum Droghe (Italy)
31. Gabinete de Atendimento à Família (Portugal)
32. GAT Grupo Ativistas Tratamentos (Portugal)
33. German Cannabis Association (Germany)
34. Giuliano Gavazzi (Encod Italy)
35. Harm Reduction Malta (Malta)
36. Healthy Options Project Skopje – HOPS (North Macedonia)
37. Helsinki Foundation for Human Rights (Poland)
38. HIV Legal Network (global)
39. InPulsar - Associação para o Desenvolvimento Comunitário (Portugal)
40. Institute for Information Activities and Alternative Culture, project (Slovenia)
41. Institute for Rational Addiction Policies (Czechia)
42. International Network of People who Use Drugs - INPUD (global)
43. Italian League for Fighting AIDS - LILA (Italy)
44. ITANPUD APS (Italy)

45. Kosmicare (Portugal)
46. L'Isola di Arran ODV (Italy)
47. La Società della Ragione (Italy)
48. Legalize NL (Netherlands)
49. Mainline (Netherlands)
50. Médicos do Mundo (Portugal)
51. Meglio Legale (Italy)
52. Metzineres (Spain)
53. Modus Vivendi asbl (Belgium)
54. MTÜ Ööhaldjad - Estonian nightlife harm reduction NGO (Estonia)
55. My Brain My Choice Initiative (Germany)
56. NGO Re Generation (Serbia)
57. Nouvelle Aube Marseille (France)
58. Palette gGmbH (Germany)
59. Polish Drug Policy Network (Poland)
60. Polish Network of People who Use Drugs - PoliNPUD (Poland)
61. Positive Voice, Greek Association of People Living with HIV (Greece)
62. Pot Radio (Italy)
63. PREKURSOR Foundation (Poland)
64. Prospective Jeunesse asbl (Belgium)
65. PsyCare Ireland: Welfare and Harm Reduction CLG (Ireland)
66. RdR LAB (Spain)
67. ReLeaf Malta (Malta)
68. Rights Reporter Foundation (Hungary)
69. Romanian Association Against AIDS - ARAS (Romania)
70. Safer Drug Policies (Norway)
71. SANANIM (Czechia)
72. SAOM (Portugal)
73. SONICS e.V. (Germany)
74. The Nightlife Empowerment & Well-being Network – NEWNet (regional)
75. Transform Drug Policy Foundation (United Kingdom)
76. Transnational Institute (global)
77. Udruga za pomoc mladima HELP - Split (Croatia)
78. Ukrainian Network of People who Use Drugs - VOLNa (Ukraine)
79. Università della Strada Gruppo Abele impresa sociale s.r.l. (Italy)
80. UNOPA Federation (Romania)
81. VIVID e.V. (Germany)
82. Women and Harm Reduction International Network - WHRIN (global)
83. Zdruzenje DrogArt (Slovenia)