

**EUROPEAN COALITION FOR JUST AND EFFECTIVE DRUG
POLICIES – ENCOD vzw**

Lange Lozanastraat 14, 2018 Antwerpen, Belgium
Telephone: +32 (0) 3 293 0886 / Mobile: +32 (0) 495 122644
e-mail: info@encod.org/ www.encod.org

**COMMENTS ON PROGRESS REVIEW EU DRUG ACTION PLAN
2005-2009**

Aim of this plan is "to significantly reduce the prevalence of drug use among the population and to reduce the social and health damage caused by the use and trade in illicit drugs". There is nothing in the progress review that allows the reader to conclude if the efforts to obtain this aim have been successful or not.

1. "Coordination"

Here we find only information about the set up of agencies, organisation of meetings etc, without any element that allows us to judge their value for the impact of drug policy. From what we have experienced ourselves with the CSF, we also fear that the Commission greatly overstates the relevance of these actions.

2. Demand Reduction

Again most information provided is about the existence of data or data collecting mechanisms, but no word on the interpretation of these data (is drug use being reduced? if yes or if no what are the reasons?, how can we explain different patterns for drug use in different eu countries? what are reasons for problematic drug use? etc..) There is apparently no analytical capacity among the writers of this progress review, or there are no data available with which they could write such an analysis.

On prevention: it said that more "comprehensive effective programmes on prevention" in schools will be put in place. How will we ever know they are effective, is there any thought given to the fact that to measure the effectiveness of prevention you need to follow young people for several years, it is an enormously time and resource consuming operation..

On treatment availability, early intervention programmes, harm reduction services: the review describes the phenomena, but it does not allow the reader to conclude if any reduction of demand has been obtained, in other words, if all these services have been "effective" in terms of obtaining the overall aim.

3. Supply reduction

First a lot of information on increased cooperation on law enforcement. But it is absolutely unclear if this has resulted in measurable improvements on the drug supply side. In 2006, less heroin, cocaine, hashish, amphetamines and LSD was seized than in 2005. Only seizures of cannabis in herbal form (in spectacular way) and XTC were higher than the year before.

The review concludes that "the information provided does not reveal the impact of these efforts on the flow of drugs from third countries into the EU. So the same as with demand reduction happens: there is a lot of information on the phenomenon, but zero on the impact of policies.

4. Cooperation on International Level

This is about the possibility to establish slow- but steadily a "EU" approach towards drugs, that should also be recognizable at international meetings such as the CND in Vienna. The writers of the progress review take for granted that the EU approach already exists, and that is a "balanced approach" - without giving any evidence or clarification for this. A process is described in which "Commission, Council, member states as well as external participants (OAS, EMCDDA, ASEAN, WHO, UNAIDS, Europol/Interpol, as well as various experts from various parts of the world)" have been preparing the EU position for the final evaluation of the UNGASS 1998 declaration. This has been a closed process, there has been no possibility for the public to be consulted here. So again: butchers testing their own meat..

Description on a lot for more programmes which seem to do the same as always: bureaucracy shaping more bureaucracy..

Law enforcement cooperation with third (producer) countries increases, but no possibility to conclude if this is successful or not

Information about money allowances, but no information on impact

5. Information, Research and Evaluation

The EU Drug Strategy for 2005 - 2012 aims the following concrete identifiable result for the field of evaluation: "to give clear indications about the merits and shortcomings of current actions and activities on EU level"

Action 39 - provide reliable and comparable data on key epidemiological indicators

Conclusion: Most countries report data, but they did not invest in ways to interpret these data over a longer period , so it is not possible to draw any conclusion on how we are doing..

Action 40 Provide reliable information on the drug situation

Conclusion: Of 28 MS, 6 report well, 20 satisfactory and two insufficiently. But again, information is on the phenomenon itself, not on reasons why, impact of policies.

on and on..

Objective 45: Continuous and overall evaluation

Here it is said in the conclusion that still, some difficulties regarding the usefulness, relevance, quality and availability of data were uncovered for some of the indicators of the Action Plan. These indicators are the same as those of the EU Action Plan

2000 - 2004. In the evaluation of that plan by the EMCDDA in October 2004, exactly the same comment was made: the indicators were too vague to allow evaluation reports to show concrete impact on them. Now, three years later, exactly the same comments are made..