

Call for evidence - EU Drugs Strategy and EU Action Plan

Contribution by the International Drug Policy Consortium

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The International Drug Policy Consortium (IDPC) is a global network of over 190 civil society and community organisations coming together to promote drug policies grounded in social justice and human rights.¹

1. Concerns over the overemphasis on supply reduction

IDPC welcomes the call for evidence released by the European Commission to feed into the new EU Drug Strategy. However, we have serious concerns over the disproportionate focus of the EC's drug policy approach on supply reduction. This is despite increasing evidence that punitive policies focusing on curbing drug supply have been ineffective in reducing the scale of the illegal drug market,² and have resulted in a wide range of human rights abuses.³ And yet, the plan to develop a new Drug Strategy addressing all aspects of drug policy, but accompanied by an Action Plan solely focusing on 'tackling drug trafficking' greatly undermines the balanced approach that the EU has prided itself of embracing over decades. This call for evidence itself seems to place an undue focus on supply reduction and combatting drug trafficking over other critical drug policy issues.

Having no Action Plan on the other aspects of the Drug Strategy would mean that no specific action or indicators to track progress and success will be available beyond 2025. This also means that the efforts and funding allocated to drug policy by the EC going forward would exclusively be allocated to supply-side activities – a major concern in the context of the funding crisis for harm reduction.

We call on the EC to ensure that an Action Plan (or a series of Action Plans) are developed for every aspect of the EU Drug Strategy, including demand and harm reduction, as well as international cooperation.

2. Safeguard civil society participation

Civil society remains an essential player in the design, implementation, monitoring and evaluation of drug policies and in the delivery of life-saving services for people who use drugs. Worryingly, civil society across Europe is facing increasing threats and attacks, including opaque and overly burdensome registration and administrative reporting processes, harassment of advocates, restrictions in freedom of speech as the sharing of harm reduction information becomes mischaracterised as 'drug propaganda', restrictions in funding including via 'foreign agent' laws, smear campaigns against NGOs promoting harm reduction and drug policy reform, and the ongoing criminalisation of people who use drugs, among others.⁴

¹ www.idpc.net

² <https://www.unodc.org/unodc/data-and-analysis/world-drug-report-2025.html>

³ <https://docs.un.org/en/A/HRC/54/53>; <https://idpc.net/publications/2023/12/idpc-shadow-report-2024>

⁴ <https://harmreductioneurasia.org/news/mapping-repressions>

The new EU Drug Strategy should place strong emphasis on highlighting the essential role played by civil society and affected communities in drug policy, promote their meaningful participation in policymaking processes, and safeguard their participation through legal protections, transparent engagement processes, and equitable access to funding.

3. Ensure an evidence- and rights-based approach to drug policy

There is increasing evidence from the UN human rights system about which drug policies and programmes that are best able to protect the health, rights and safety of communities - including reports by the Office of the UN High Commissioner for Human Rights (OHCHR),⁵ the UN Special Rapporteur on the right to health,⁶ and key guidance such as the International Guidelines on Human Rights and Drug Policy⁷ and the UN System Common Position on drugs⁸ – both of which were explicitly mentioned in the EU Drug Strategy for 2021-2025.

We call on the EC to ensure that these landmark reports and guidance from the UN are once again mentioned within the new Drug Strategy, alongside the Sustainable Development Goals.

4. Prioritise harm reduction and the right to health

Harm reduction remains the drug policy intervention with the strongest evidence base of effectiveness in reducing the possible risks and harms faced by people who use drugs, and is an essential component of the right to health.⁹ One of the major gains from the EU Drug Strategy for 2021-2025 was the inclusion, for the first time, of a new pillar on harm reduction.

The evaluation of the Strategy recommended the expansion of harm reduction services such as drug consumption rooms and take-home naloxone and in prison settings. It also recommended the adoption of minimum quality standards for demand and harm reduction services ‘incorporating measurable need-based indicators’.¹⁰

As recommended by the UN Special Rapporteur on the right to health, harm reduction measures should be holistic and aim to address the intersecting layers of vulnerabilities faced by people who use drugs, including access to housing, measures targeting gender-based violence, mental illness, vulnerabilities due to unstable migration status, etc.¹¹

At a time when harm reduction funding is drying out and services are closing down as a result, it is critical that the new Drug Strategy continues to promote harm reduction as a key pillar of EU drug policy, and that an action plan be developed with concrete indicators that track the availability and accessibility of a wide range of services, especially for marginalised communities (in particular women, LGBTQI+ communities, young people, migrants, ethnic groups).

⁵ <https://docs.un.org/en/A/HRC/54/53>

⁶ <https://docs.un.org/en/A/HRC/56/52>

⁷ <https://www.humanrights-drugpolicy.org/>

⁸ <https://www.unodc.org/unodc/common-position-drugs/index.html>

⁹ <https://docs.un.org/en/A/HRC/56/52>

¹⁰ [https://ec.europa.eu/transparency/documents-register/detail?ref=SWD\(2025\)188&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2025)188&lang=en)

¹¹ <https://docs.un.org/en/A/HRC/56/52>

5. Enable policy innovation

It is clear today that the strategy aiming to reduce illegal drug demand and supply has failed,¹² while levels of violence, human rights abuses, stigma and discrimination continue to prevail.¹³ In various contexts, law enforcement strategies have been counterproductive, leading to the emergence of new, potentially more harmful, substances.

Various jurisdictions have now moved, or are considering moving, towards alternative drug policy models. Across the EU, 12 countries have decriminalised at least one drug, in an attempt to stop incarcerating people simply for their drug use, encourage access to services, and reduce stigma and discrimination.¹⁴ Others have adopted regulated markets for certain drugs in order to reduce the harms of punitive drug policies and establish more effective controls over the market. Responsible regulation is now endorsed by the OHCHR,¹⁵ UN Special Rapporteur on the right to health¹⁶ and UNDP.¹⁷

It is critical that the new EU Drug Strategy recognises these national reforms and allows for flexible and innovative policies (and provides indicators aimed at measuring their health and social impacts) within Member States.

6. Strengthen the EU's progressive stance at the UN

The EU has traditionally played a key role in promoting evidence-, rights- and health-oriented drug policies at the UN. Various major international milestones will take place during this new Strategy, including the 10-year anniversary of the UNGASS in 2026, the presentation of the conclusions of the independent experts responsible for a review of the UN drug control regime as per CND Resolution 68/6 in 2027, and the final review of the 2019 Ministerial Declaration on drugs. In the current multilateral, funding and liquidity crisis faced by the UN, it will be all the more important for the EU to retain a strong, progressive and unified voice at the UN, especially at the UN Commission on Narcotic Drugs.

The EU's position at the UN should be informed by international human rights guidance enshrined in the UNGASS Outcome Document, the International Guidelines on Human Rights and Drug Policy and the UN System Common Position on drugs. Importantly, the EU should consult with, and incorporate comments from, civil society as it elaborates its positions at the UN.

¹² https://www.euda.europa.eu/data/source-data/edr/2025/complete_en

¹³ <https://docs.un.org/en/A/HRC/54/53>

¹⁴ <https://www.talkingdrugs.org/drug-decriminalisation/>

¹⁵ <https://docs.un.org/en/A/HRC/54/53>

¹⁶ <https://docs.un.org/en/A/HRC/56/52>

¹⁷ <https://www.undp.org/publications/development-dimensions-drug-policy-assessing-new-challenges-uncovering-opportunities-and-addressing-emerging-issues>