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World Health Organization

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**Comments on the WHO Discussion Paper, dated 26 July 2012, on
Development of an updated Action Plan for the Global Strategy for the
Prevention and Control of Noncommunicable Diseases covering the period
2013 to 2020**

IOGT-NTO is grateful for the opportunity to comment on the discussion on the action plan 2013 to 2020 for the prevention and control of NCD.

IOGT-NTO is a Swedish Non-Governmental Organisation with around 32 000 members. We work with alcohol policy issues by promoting science-based policies independent of commercial interests, as well as with drug policy and preventive and social work, both internationally and in Sweden.

We support the growing international awareness of NCDs, of the corresponding risk factors and of the importance of prevention. In this reply we focus on alcohol as a risk for public health. At the same time we recognize the importance of other risk factors for NCDs.

Answers to specific questions

Which recommended actions for Member States would generate a national political commitment on how to contribute to a global target of a 25% reduction in premature mortality from NCDs by 2025?

To strengthen national political commitment, the consequences of chronic diseases on economic development, on standard of living and on business economy should be demonstrated. Need of resources from local and national authorities, taken into account demographic development, on account of NCD should also be demonstrated. At the same time the effects of preventive measures should be demonstrated. It would therefore be an advantage if WHO increased cooperation with international economic and development bodies like the World Bank, World Economic Forum and OECD, to carry out studies on these topics, on global and national level, and disseminate the results through WHO as well as through the economic and development bodies to national and local level.

Which recommended actions for the WHO Secretariat could be included in the 2013 to 2020 Action Plan to strengthen the capacity of Member States in mobilizing a whole-of-government response to NCDs?

In addition to demonstrating the importance of NCD prevention mentioned above, WHO Secretariat could contribute to the awareness of the inherent contradiction of interest of the alcohol industry by disseminate information to the Member States on the conflict between the alcohol industry's pursuit of making money from the sale of alcohol and the need to reduce consumption and harm from alcohol. This would increase the possibilities at national level to limit the lobbying activities of the alcohol industry, which not seldom is directed at other governmental departments than the departments responsible for health, and thereby strengthen the capacity for whole-of-government response to NCD.

WHO secretariat could also initiate an analysis of the impact of international trade agreements on the possibilities of Member States to implement effective measurements to prevent NCDs, in the case of alcohol e.g. "best buys" like limiting availability, increasing taxes and ban advertising. This could increase awareness of the role of trade departments in the work of controlling and preventing NCDs and thereby also contribute to a whole-of-government response.

Which recommended actions for Member States would increase and prioritize budgetary allocations for addressing NCDs? (including through an increase in taxation on tobacco and alcohol)

Increases in taxation of tobacco and alcohol are doubly effective, in that they limit consumption, and thereby reduce problems and costs for the health sector, at the same time as they increase government revenue. Taxation should therefore be used together with measures that limit physical availability to achieve a stronger effect on reducing consumption, harm and costs.

What are the roles and responsibilities of civil society and the private sector?

The role of public-interest nongovernmental organizations in the formation of public policy is to raise people's awareness of issues and the related concerns, advocate change and create a dialogue with governments and their agencies on policy. As such the role of public-interest NGOs is vital. The importance of the participation of civil society organizations without conflict of interests in alcohol policy development needs to be emphasised, as a counter-influence to the vested trade interests, which may otherwise dominate political decision-making.

There is an inherent contradiction between the alcohol industry's interest in increased sales and consumption of alcohol and the society's interest in limiting the harm caused by alcohol through limiting consumption, which needs to be taken account of e.g. in connection with preventing and controlling noncommunicable diseases. The process of forming policies and deciding on interventions needs to be carried out in the interest of the general population and society. The conflict of interest for the alcohol industry is apparent and the strong interest from the industry in the outcome of policy-making processes can fundamentally compromise and distort international and national public health priorities and policies. The alcohol industry cannot be accorded the status of a stakeholder alongside others engaged in the development of public policy

The conflict of interest is not limited to the direct involvement of industry. There is a need to make a clear distinction between business-interest, not-for-profit, NGOs that are set up by, representing or closely linked to, business interests, on one hand, and public-interest NGOs on the other.

As the most effective and cost-effective interventions to reduce alcohol harm are interventions that regulate the environment in which alcohol is marketed (economic and physical availability and commercial communications), it is not surprising that the alcohol industry generally opposes such interventions.

The issue of not allowing organisations, with a direct or indirect commercial interest in the sale of alcohol, participate in forming policy and planning actions on NCDs is basically an issue of maintaining democratic principles, establishing adequate and effective accountability mechanisms and safeguarding public interests in global health governance.



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