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World Health Organization

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Comments on the first WHO discussion paper on strengthening multisectoral actions for NCDs

IOGT-NTO is grateful for the opportunity to comment on the discussion on multi-sectoral action for NCDs within WHO and the UN.

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. In these comments we focus on multisectoral actions in the alcohol field, as one of the main risk factors for noncommunicable disease, while acknowledging similar concerns in other areas of NCD prevention and control.

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 multisectoral actions to prevent and control 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, and public-interest NGOs.

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.

The alcohol industry and policy formation

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.

Examples of alcohol industry activities to oppose effective interventions include

- Opposing attempt to increase excise taxes in California and Australia ¹
- Opposing introduction of marketing restrictions in France (Loi Évin) ²
- Actions and positions of Miller Brewing Company, a subsidiary of Philip Morris, according to confidential documents made available through the work with tobacco control, covering issues like opposing taxation, advertising restrictions and reductions in blood alcohol levels for drivers ³
- Opposing tax increases in Spain ⁴
- Opposing lowered blood alcohol concentration for drivers, reducing overall consumption and alcohol marketing legislation, as well as lobbying for increased opening hours in Ireland ⁵
- Opposing lowered alcohol level for drunk driving in the UK ⁶
- Alcohol policy initiatives in sub-Saharan Africa that ignore effective environmental interventions and focus on the economic benefits from the trade in alcohol ⁷

In a European questionnaire survey the views of alcohol policy of the alcohol industry, representatives of governmental and non-governmental organizations were compared. The alcohol industry viewed regulatory measures as of low impact and policy importance, in strong contrast to both representatives of NGOs and of governmental organisations. The author concludes

“Whilst representatives of the alcohol industry regard themselves as having an equal place to governmental organisations and NGOs in policy discussion, they bring to the policy table markedly different views than governmental organisations and NGOs, proposing educational measures,

¹ Alcohol: No Ordinary Commodity, Second Edition, Thomas Babor et.al., 2010

² Ibid.

³ Access to Confidential Alcohol Industry Documents: From ‘Big Tobacco’ to ‘Big Booze’, Laura Bond et.al., Australasian Medical Journal 2009, 1, 3, 1-26

⁴ A case study on alcohol policy and the alcohol industry in Spain, Alicia Rodríguez-Martos, Nordic Studies on Alcohol and Drugs, 2006, 6

⁵ The influence of the alcohol industry on alcohol policy in Ireland, Ann Hope, Nordic Studies on Alcohol and Drugs, 2006, 6

⁶ Alcohol industry and alcohol policy in the United Kingdom, Colin Drummond & Sanjoo Chengappa, Nordic Studies on Alcohol and Drugs, 2006, 6

⁷ Vested Interests in Addiction Research and Policy - Alcohol policies out of context: drinks industry supplanting government role in alcohol policies in sub-Saharan Africa, Øystein Bakke & Dag Endal, Addiction January 2010

for which the scientific evidence for impact is rather wanting, and opposing regulatory measures, for which the scientific evidence for impact is rather strong. In contrast, government officials and non-governmental organizations view industry lobbying as a major barrier to effective alcohol policy.”⁸

In an overview of the alcohol industry⁹ the American Medical Association states that the examination

“dispels the myth of excessive drinking as solely the product of individual choice while underscoring the role the alcohol industry plays in contributing to the health risks, fatalities, violence, and other problems associated with underage and high-risk consumption of alcohol.”

In the conclusion the report states

“It [the alcohol industry] seeks to keep everyone’s focus on what may be desirable and pleasant about the product. But it also knows it has a major source of weakness: alcohol itself and the dangers, risks and great harm to life, health and community well-being that it engenders. Although industry segments may conflict over particular issues and fight for market share, as a whole it seeks to maximize its profits and create a policy and legislative environment favorable to its operations with as few controls as possible.”

WHO

As stated in Article 1 in the Constitution of the World Health Organization: “The objective of the World Health Organization shall be the attainment by all peoples of the highest possible level of health.” To uphold the independence and integrity of WHO there is a need to safeguard public interest by creating clear, comprehensive and effective conflict-of-interest policies.

The Declaration on Young People and Alcohol by the WHO European Ministerial Conference 2001 states “public health policies concerning alcohol need to be formulated by public health interests, without interference from commercial interests”, a position that needs to be upheld in, among other areas, the policies for multisectoral actions on NCDs.

IOGT-NTO’s position

The issue on participation of organisations, with a direct or indirect commercial interest in the sale of alcohol, in multisectoral 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.

We call on the WHO to:

- Develop a ‘Code of Conduct’ that sets out a clear framework for interacting with the private sector that includes texts to recognize and avoid conflicts of interest.

⁸ Stakeholders’ views of alcohol policy, P. Anderson & B. Baumberg, , Nordic Studies on Alcohol and Drugs, 2006, 6

⁹ Alcohol Industry 101 – it’s structure and organization, American Medical Association, 2004

In regard to alcohol being a significant risk factor for NCDs there is a need to establish similar guidelines concerning the alcohol industry as for the tobacco industry in the Framework Convention of Tobacco Control, i.e. in setting and implementing public health policies with respect to alcohol control, these policies shall be protected from commercial and other vested interests of the alcohol industry.

- Recognise and distinguish between industries, including business-interest not-for-profit organisations (BINGOs) and public interest non-governmental organisations (PINGOs), that are both currently under the 'Civil Society' umbrella without distinction.

Comments on specific policies and actions – conflict of interest

The principle of protecting policy formation and implementation from commercial and other vested interests of the alcohol industry, needs to be upheld in at least the following actions listed in the WHO discussion paper 1, Effective approaches for strengthening multisectoral action for NCDs.

Issue 1 - Achieving whole of government action

- Proposed actions for Member States
 - Form multistakeholder and multisectoral working groups to assist in the formation and implementation of national plans.
 - Develop national multisectoral framework inclusive of mechanisms for planning, guiding, monitoring and evaluating enactment of multisectoral policies and their impacts on NCDs, as well as analyzing the impact of NCDs on different government sectors
- Proposed actions for civil society
 - Ensure an independent voice for accountability
- Proposed actions for the private sector:
 - Engage with the government (relevant ministries and multisectoral working groups) to bring core business expertise to support government priorities, depending on industry and business strengths as appropriate.

Issue 2 – Political leadership

- Proposed actions for Member States:
 - Recognise the "community domain" in all health policies – i.e. that civil society, the general public and the private sector need to have a voice in setting NCD policy for a country – and create platforms for engagement. Encourage social movements for NCD prevention and control.

Issue 3 - Responsible stewardship and conflict of interest

- Proposed actions for Member States:
 - Develop guidelines and codes of conduct for engagement with NCD stakeholders
 - Ensure full and transparent declarations of conflict of interest.

- Proposed actions for intergovernmental organizations and international financial institutions:
 - Develop guidelines and codes of conduct for engagement with NCD stakeholders to support NCD goals and related multisectoral action.
 - Ensure due diligence for partnerships
- Proposed actions for civil society:
 - Ensure an independent voice for accountability
 - Consider use of codes of conduct to manage conflict of interest
 - Ensure full and transparent declarations of conflict of interest
- Proposed actions for the private sector
 - Ensure full and transparent declarations of conflict of interest.
- Proposed actions for the WHO Secretariat:
 - Clarify and disseminate WHO approaches to engaging the private sector, incorporating all existing due diligence, to support NCD goals and related multisectoral action.

Issue 5 - Sustainable workforce for action against NCDs

- Proposed actions for the private sector:
 - Contribute relevant expertise through programmes such as training programmes and processes, secondments, etc.

Issue 7 - Promote development and use of impact assessment methods to monitor and evaluate multisectoral action

- Proposed actions for Member States:
 - Convene government-wide (national or local) working group to identify approaches across sectors for impact assessment for NCD multisectoral action.
 - Ensure due diligence to avoid undue influence of private sector in such assessment (e.g. tobacco companies).
- Proposed actions for intergovernmental organizations and international financial institutions:
 - Working collectively with WHO, identify best practice for impact assessment for application to NCD and multisectoral action.
 - Apply impact assessment to development assistance and lending projects across sectors (for NCDs and health).
 - Ensure due diligence to avoid undue influence of private sector in such assessment (e.g. tobacco companies).
- Proposed actions for the WHO Secretariat:
 - Ensure due diligence to avoid undue influence of private sector in such assessment (e.g. tobacco companies) and make recommendations on ways to ensure effective due diligence decisions.

Comments on specific policies and actions – other issues

Issue 2 – Political leadership

In the action point below, a reference to WHO global alcohol strategy should be added, alongside with the FCTC and the Action Plan for Control of NCDs:

- Proposed actions for the WHO Secretariat:
 - Ensure support for continued implementation of WHO Framework Convention on Tobacco Control and the 2008-2013 Action Plan for the Global Strategy for the Prevention and Control of NCDs.

Issue 3 - Responsible stewardship and conflict of interest

As can be seen from the above text, it is important to prioritize the management and awareness of the inherent conflict of interest of the alcohol industry and we strongly agree with the attention given to the general conflict of interest stated in the discussion paper. However, there is a need to explicitly include the alcohol industry in this section, e.g. adding alcohol industry to the statement “there is a fundamental conflict of interest between the tobacco and alcohol industry and public health”.

Issue 4 - Sustainable financing for addressing NCDs

Given the double advantage of alcohol taxation in reducing consumption and harm at the same time as increasing revenue, the option of alcohol taxation should be prioritized and strengthened alongside with tobacco taxation.

In the proposed actions for Member States, alcohol taxation should be added, for the reasons mentioned above.



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