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World Health Organization

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Comments on the WHO Updated Revised Draft, dated 15 March 2013, on a Global Action Plan for the Prevention and Control of Non-communicable Diseases 2013-2020

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 this reply we focus our comments on alcohol as a risk for public health.

We welcome the amendments to the section on Overarching principles and approaches and support, especially that conflict of interest, i.e. that public health policies, strategies and multisectoral action must be protected from influence by any form of vested interest, is included in these principles.

But we note that although this overarching principle is repeated for tobacco control in the section on policy options for Member States, the wording is different in the section on alcohol harm ("protecting these policies from undue influence of commercial and other vested interests"). Given the inherent contradiction of the commercial interests of the tobacco and alcohol industries and improved public health, the wording in the section on alcohol harm should be the same as in the overarching principles and on tobacco control. We therefore suggest that to the text of section 33 a) the following is added:

The development and implementation of such policies should be protected from commercial and other vested interests of the alcohol industry.

Furthermore, in the sections on Member States policy options for the four risk factors (sections 30-33), only in the case of alcohol are the policy options and cost-effective interventions in Appendix 3, <u>not</u> mentioned. We therefore suggest that these policy options are added to section 33, in the same way as for tobacco, unhealthy diet and physical inactivity. We therefore suggest the following text be added to section 33 a)

In order to reduce the harm caused by alcohol consumption, give priority to the following core set of very cost-effective interventions as part of a comprehensive multisectoral package:

- Excise tax increases on alcoholic beverage
- Comprehensive restrictions and bans on alcohol advertising and promotion
- Restrictions on the availability of retailed alcohol

On the responsibility of protecting health

Alcohol and tobacco are two of the most serious, modifiable threats to health world-wide. Alcohol alone causes almost 5 million deaths each year. It is the responsibility of member state governments, and of WHO, to ensure that setting and implementing policies to prevent the human suffering from these deaths and the burden of disease, is made in the interest of the public and protected from the economic interests of the tobacco and alcohol industries.

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