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World Health Organization

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Comments on the WHO Revised Draft, dated 11 February 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.

We support the growing international awareness of NCDs, of the corresponding risk factors and of the importance of prevention and welcome the WHO Revised Draft on a Global Action Plan for NCDs. 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 and of health systems to respond to health-care needs of people with NCDs.

IOGT-NTO urges WHO and its member states to:

- Stand firm by the Political Declaration adopted by the UN General Assembly in September 2011 on the critical importance of reducing the level of exposure of individuals and populations to alcohol and other modifiable risk factors.
- Stand firm by the Political Declaration of the UN General Assembly to advance the implementation of population-wide interventions in order to reduce the impact of alcohol, together with the other main risk factors.
- Stand firm by the WHO global alcohol strategy on the influence on public health of the general level of consumption of alcohol in a population, and by adult alcohol per capita consumption as indicator, based on the scientific well established relation to harm and the global availability of data.
- Stand firm by the revised draft's minimum set of actions of high-impact interventions for alcohol, which are based on best available scientific evidence, i.e. excise tax increases on alcoholic beverages, comprehensive restrictions and bans on alcohol advertising and promotion, and restrictions on the availability of retailed alcohol. Tax increases 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.
- Recognize the 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. Setting and implementing public health policies with respect to alcohol should be protected

from commercial and other vested interests of the alcohol industry, in the same way as for tobacco policies.

IOGT-NTO detailed recommendations on the Revised Draft

Para 21 b)

Advocacy for action: include *“ensuring NCDs are included in the post-2015 development agenda”*.

Para 22 c)

Policy advice and dialogue: Add *“Include health indicators for NCDs in accordance with the global monitoring framework in the post-2015 development agenda”*.

Para 38 a)

Multisectoral national policies: Edit *“Encourage the implementation of the WHO identified minimum set of three interventions of increased taxes, bearing in mind the significance of revenues gained from taxes on alcohol products, restrictions on availability and bans on advertising for alcohol products, alongside other crucial policy areas of*

- *bans on alcohol promotion and sponsorship*
- *leadership, awareness and commitment*
- *health services’ response*
- *community action*
- *drink-driving policies and countermeasures*
- *reducing the negative consequences of drinking and alcohol intoxication*
- *reducing the public health impact of illicit alcohol and informally produced alcohol*
- *monitoring and surveillance*

Para 38 b)

Public health policies: Edit *“Ensure that public health policies and interventions to reduce the harmful use of alcohol are guided and formulated by public health interests, based on the best available evidence and protected from commercial and other vested interests of the alcohol industry.”*

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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