Policy Coherence 2017 Conference  
World Health Organization Global Conference on NCDs  
Geneva, Switzerland  

Subject: Commentary on Draft Outcome Document  

The Healthy Latin American Coalition (CLAS for its abbreviation in Spanish) is a coalition of more than 200 non-governmental organizations working to reduce inequities, protect human rights, and promote effective policies to tackle the burden of risk factors and determinants of NCDs. CLAS has focused on regional advocacy, research for advocacy, information exchange and capacity building. It has supported policy actions in various countries and responded rapidly to threats to policies that promote health. CLAS is appreciative of the opportunity to comment on the draft outcome document for the Montevideo Conference, October 2017.  

The CLAS coalition wholeheartedly supports the recommendations by the NCD Alliance, of which we are a member, and wants to expressly highlight the following:  

1. Conflicts of Interest. Based on our experience in Latin America, the number one threat to effective policies that favor health to prevent and control NCDs is the aggressive posture and opposing actions of the industries that sell unhealthy products such as tobacco, ultra-processed foods, sugary beverages, and alcohol. This incoherence creates barriers to implementation of policies and interventions recommended in the updated Appendix III of the WHO Global NCD Action Plan 2013-2020. We believe that the Montevideo outcome document should contain a commitment from governments to implement Article 5.3 of the Framework Convention on Tobacco Control and agreement to a similar position for other unhealthy commercial products. Further, there should be a commitment to ensure this issue is addressed at the 2018 UN High Level Meeting. Public health must have priority over the commercial interests of these businesses.  

2. Financing of NCD commitments. Funding to advance NCD prevention and control is disproportionally small in comparison to the level of the challenge. As civil society organizations, we are keenly aware of this situation as many of our members are financially vulnerable. The Montevideo outcome document needs to indicate a strong commitment from governments to establish funding streams. In particular, taxation of unhealthy products has already been identified as an effective mechanism to fund NCD commitments. Fiscal policies are essential to provide incentives and disincentives that favor health. There is evidence that these taxes are well accepted by the public, particularly when the funds are used to contribute to improved health and well-being.
In general, we believe the Montevideo outcome document may be made stronger by including the political commitments from the highest levels of government, including relevant authorities beyond the health ministries.

Sincerely,

Healthy Latin America Coalition / Coalición Latinoamérica Saludable (CLAS) and its member, which include:

- InterAmerican Heart Foundation and Affiliates in Mexico, Argentina, Bolivia and Caribe
- ACT Promoção da Saúde, antiga Aliança de Controle do Tabagismo, Brazil
- El Poder del Consumidor and Alianza por la Salud Alimentaria
- Instituto de Investigaciones en Salud y Nutrición, Univ. San Francisco de Quito, Ecuador
- Framework Convention Alliance (FCA)
- ALIAR Tobacco Coalition Argentina
- Alliance for the Control of NCDs Chile
- Healthy Chile Front
- EPES Foundation, Santiago, Chile
- Centro de Investigación para la Epidemia de Tabaquismo, CIET-Uruguay
- Instituto Nacional de Cáncer, Uruguay
- Instituto Brasileiro do Defesa do Consumidor IDEC (Brasil)
- Federación Brasileña de Instituciones Filantrópicas de Apoyo a la Salud de la Mama (FEMAMA), Porto Alegre, Brasil
- Educar Consumidores (Colombia) y Mesa por las ENT Colombia
- Fundación Colombiana de Obesidad (Funcobes)
- Alianza ENT Perú
- FUNDEPS (Fundación para el Desarrollo de Políticas Sustentables) Argentina
- SLACOM Sociedad Latinoamericana y del Caribe de Oncología Médica (regional)
- Coalición México Salud-Hable (México) y Alianza Nacional para el Control del Tabaco ALIENTO (México)
- Public Health Institute (Mexico y Brasil)
- World Cancer Research Fund International
- World Public Health Nutrition Association
- Asociación Uruguaya de Dietistas y Nutricionistas (AUDYN)
- Salud Crítica (México)

Website at foot of page displays additional members of CLAS