Dear Madam or Sir,

thank you for inviting the non-State sector to submit comments on the Montevideo Roadmap 2018-2030 on NCDs as a sustainable development priority. Herein we submit our comment as the Cancer Prevention Unit and WHO Collaborating Centre for Tobacco Control at the German Cancer Research Center.

We highly appreciate the Roadmap and fully support commitment of the Governments to accelerate progress of the prevention of NCDs.

We base our comment on a long-standing experience with the momentous tactics of the tobacco industry to oppose tobacco control measures and to water down effective tobacco control measures by trying to implement weak self-restrictions instead. Therefore, we highly appreciate that the Roadmap includes the exclusion of any tobacco interference: “Recognizing the fundamental and irreconcilable conflict of interest between the tobacco industry and public health, we will continue to implement tobacco control measures without any tobacco industry interference.”

Keeping these industry tactics in mind, and knowing that the alcohol and food industries use the same tactics to prevent effective regulation, we are very concerned
- that the Roadmap fails to mention inherent conflicts of interest of the alcohol and food industries with health promotion and NCD prevention, and
- that the Roadmap does not include any restrictions of such industry interference with the implementation of policies to promote healthy eating and drinking.

Therefore, we strongly recommend adding clear and strong restrictions regarding the engagement of governments with the alcohol and food industries when implementing policies and measures to promote healthy eating and drinking.

Please also consult the notes added in the draft document attached.

Kind regards,

Katrin Schaller

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WHO Global Conference on NCDs
Pursuing policy coherence to achieve SDG target 3.4 on NCDs
(Montevideo, Uruguay, 18-20 October 2017)
24. One of the main challenges for the prevention and control of NCDs is that public health objectives and private sector interests can, in many cases, conflict. We commit to enhancing the national capacity to engage constructively with the private sector for NCDs prevention and control in a way that maximizes health gains.

COMMENT: The interests of the tobacco, food and alcohol industries are in conflict with public health objectives. Therefore, it should be added that engagement with the tobacco industry is excluded and engagement with the food and alcohol industry should be extremely restricted.

26. We further encourage the private sector to produce and promote more food products consistent with a healthy diet, including by reformulation products.

COMMENT: Here, it should be noted that regulatory policies should be given priority, as self-restrictions by the industry usually show no or only weak effects. to provide healthier options that are affordable and accessible and that follow relevant nutrition facts and labelling standards, including information on sugars, salt and fats and, where appropriate, trans-fat content; to take measures to implement WHO set of recommendations to reduce the impact of the marketing of unhealthy foods and non-alcoholic beverages to children, while taking into account existing national legislation and policies.

29. We call upon all countries to accelerate the implementation of the WHO Framework Convention on Tobacco Control, as appropriate, as one of the cornerstone of the global response to NCDs. Recognizing the fundamental and irreconcilable conflict of interest between the tobacco industry and public health, we will continue to implement tobacco control measures without any tobacco industry interference.

COMMENT: The same should be added for alcohol industry interference. As long as the food industry is marketing unhealthy food, interference of the food industry with the implementation of policies to promote healthy eating should be excluded, too.