RECOMMENDATIONS ON THE MONTEVIDEO ROADMAP ON NCDS AS A SUSTAINABLE DEVELOPMENT PRIORITY

The Framework Convention Alliance (FCA) for Tobacco Control welcomes the opportunity to provide comments on the draft Montevideo Roadmap 2018-2030 on NCDs as a sustainable development priority.

Tobacco use is a risk factor for each of the four major classes of NCDs. It is critical that governments implement effective tobacco control part of a coherent approach to addressing the NCD epidemic.

The WHO Framework Convention on Tobacco Control (FCTC) provides the roadmap for governments to reach the global voluntary NCD target of a 30% relative reduction in tobacco use prevalence by 2025, as well as Sustainable Development Goal 3 on health and its target 3.4 to reduce by one-third premature mortality from non-communicable diseases by 2030 through prevention and treatment.

Current data suggests, however, that the world will not reach its 2025 target on current trends¹. In order to foster greater policy coherence and accelerate progress towards 2025 and 2030 goals on tobacco and NCDs, FCA recommends strengthening the text of the Roadmap in the following three ways.

Reinforcing commitments to tax tobacco

FCA agrees with the need for governments to implement fiscal policies to combat NCDs, as noted in Paragraph 6 of the Roadmap. Tobacco taxes provide one example of an effective fiscal policy that governments have already begun to implement as part of their efforts to curtail the NCD epidemic. Tobacco taxes are also included in the Framework Convention on Tobacco Control, under Article 6.

For the purposes of the Roadmap, FCA emphasizes that it is important to distinguish between fiscal policies that address the impacts of the four common risk factors for NCDs, and fiscal policies that address the risk factors themselves.

Tobacco taxation works to reduce the prevalence of NCDs because it reduces the prevalence of the leading risk factor for developing these conditions – tobacco use – thus decreasing illness and mortality. As such, FCA recommends that the text of paragraph 6 of the Roadmap be updated in the following way to reflect that fiscal policies must address risk factors themselves, not just their impact:

“6. We will prioritize the most cost-effective, affordable and evidence-based interventions that will bring the highest public health return on investment, in accordance with national context and priorities. We will emphasize health as a political priority, which must be

The example of tobacco taxation provides a strong precedent in more ways than one. Tobacco taxes are not only the single most effective means of reducing the prevalence of the leading risk factor in the development of NCDs, but there is intergovernmentally agreed consensus on what makes – and doesn’t make – good tobacco tax policy. This consensus is reflected in the guidelines for implementation of FCTC Article 6. Moreover, lessons learned from implementing and administering effective tobacco taxes may help to build capacity for other forms of tax, such as taxes targeting other NCD risk factors.

In light of this, FCA recommends that the following sentence be added to the end of Paragraph 6 in reference to the particularly important role of tobacco taxes in combatting NCDs:

“In particular, we commit to making tobacco products less affordable over time to reduce tobacco consumption and prevalence.”

This wording makes reference to the guidelines for implementation of Article 6 of the FCTC, which notes that Parties should “take into account, among other things, both the price elasticity of demand, as well as inflation and changes in household income, to make tobacco products less affordable over time in order to reduce consumption and prevalence”.

Generating revenue through tobacco taxation

FCA notes with appreciation the reference in Paragraph 15 to the important role that tobacco taxes can play in generating revenue for governments and creating fiscal space for action on NCDs.

Nonetheless, FCA suggests that the Roadmap should include a stronger commitment to implement this proven, revenue-generating measure. At the Financing for Development conference held in July 2015, governments of the world agreed, via the Addis Ababa Action Agenda, on the need to increase tobacco taxes in order to address the NCD and tobacco epidemics and mobilise additional resources to achieve the Sustainable Development Goals.

FCA thus recommends the following amended wording in paragraph 15 of the Roadmap, in order to ensure coherence between the Roadmap and other intergovernmental agreements on the role of tobacco taxes:

“15. Where needed, we will work on national investments cases for the prevention and control of NCDs, their risk factors and determinants, to create the fiscal space for action. Many countries will have to manage blends of innovative and traditional funding sources. We commit to implementing price and tax measures on tobacco as an effective means to both reduce tobacco consumption and associated costs, as well as to generate revenue. Where appropriate, we will consider using additional interventions that have the capacity to generate revenues such as taxation of tobacco, alcohol, sugar-sweetened beverages as well as impact investment.”
Recognizing the role of the FCTC Conference of the Parties in accelerating FCTC implementation

FCA supports the text of paragraph 29 which calls on countries to accelerate implementation of the FCTC. As mentioned above, the Convention is a critical tool to achieve progress in curbing the NCD epidemic.

At the same time, FCA requests that the Roadmap also recognize the role of the FCTC Conference of the Parties (COP) as the primary global forum for discussions on tobacco control implementation. In particular, it is anticipated that the eighth session of the COP will discuss and potentially adopt a medium-term strategic framework for the Convention, which will detail a plan of action to strengthen implementation of the Convention.

FCA thus recommends the inclusion of the following text recognizing this important development under the FCTC:

“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. We welcome and support the elaboration of a draft medium-term strategic framework for FCTC implementation that will be discussed at the eighth session of the FCTC Conference of the Parties in October 2018. 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.”