GAPA statement to WHO Consultation:

**Development of an outcome document for the WHO Global Conference on NCDs – Montevideo Roadmap 2018-2030 on NCDs as a Sustainable Development Priority**

Submitted to policycoherence2017@who.int

The Global Alcohol Policy Alliance (GAPA) appreciates the opportunity to comment on the above discussion paper. Having reviewed the draft Montevideo Roadmap, we submit the following comments.

Harmful use of alcohol is recognized as one of the four major modifiable risk factors driving the rise in Non-communicable diseases worldwide. Addressing the risk factors is paramount in preventing and controlling NCDs. Without successful prevention, the cost to health systems and society at large will be too big to cope with, particularly in low and middle income countries where NCDs are a major challenge.

Concerns have been raised over the slow progress in tackling NCDs. One element in this challenge is that measures to prevent the spread of disease through addressing the risk factors often go contrary to the interest of multinational companies. The market power of these companies can sometimes spill over into political power. Public health has to contend with these challenges. The then WHO Director General, Dr. Margaret Chan pointed this out in her opening address to the Health for All Conference in Helsinki in June 2013: “Efforts to prevent non-communicable diseases go against the business interests of powerful economic operators. In my view, this is one of the biggest challenges facing health promotion.” She also added: “it is not just Big Tobacco anymore. Public health must also contend with Big Food, Big Soda, and Big Alcohol. All of these industries fear regulation, and protect themselves by using the same tactics.”

These are important elements that need attention from the Ministers in Montevideo.

Referring to the proposed outcome document, some specific comments may be put forward:

- In para 2 GAPA calls for the inclusion of commercial determinants as factors influencing NCDs as below
  - We acknowledge that premature mortality from NCDs continues to constitute one of the major challenges for development in the 21st century, driven by economic, environmental, **commercial** and social determinants of health.

- GAPA strongly support the perspective put forward in paragraph 3, including the problems related to unhealthy products industry interference in effective use of regulatory and fiscal

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1 WHO Director-General addresses health promotion conference; Opening address at the 8th Global Conference on Health Promotion, Helsinki, Finland, 10 June 2013; http://www.who.int/dg/speeches/2013/health_promotion_20130610/en/
measures to prevent NCDs. In addition to the observations above, a recent paper by Professor Rob Moodie\(^2\) has summarized the tactics used by unhealthy industries to undermine public health policies. We strongly believe that the Montevideo roadmap should take heed of this challenge and address it appropriately in this particular paragraph and throughout the outcome document.

- In the section on “Reinvigorating political action” (para 5-7) we miss a stronger text on the risk factors for NCDs. Although it is mentioned briefly in para 6, we think this is the section where bold ambitions should be stated.

- We note that throughout the document potentially good ambitions on taxation have been weakened quite bit by softening language such as “where appropriate” and “will consider”. We call on Member States to stand up for stronger language on well accepted, effective measures to reduce the risk factors, including alcohol.

- In para 16 (or in a following paragraph) we would have liked to see a call to funding agencies to also support civil society efforts on NCDs. Such efforts stretch through a long continuum from advocacy action through continued care.

- The document is very weak on alcohol. FCTC is mentioned along with unhealthy food (para 22). A reference to the WHO Global strategy to reduce the harmful use of alcohol (2010) is needed and GAPA calls for inclusion of a request for study of the necessity and feasibility of a legally binding international instrument to strengthen the public health response to the harmful use of alcohol.

- In para 33 the dangers inherent in the involvement of private sector actors where a conflict of interest exists needs to be acknowledged:

  - We call on the private sector, **where no conflict of interest exists**, ranging from micro-enterprises to cooperatives to multinationals, to contribute to address NCDs as a development priority, in the context of the achievement of the SDGs, in particular SDG 173.

Oslo /Auckland 25 August 2017

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