To:

WHO Secretariat
ncdpartnership@who.int

Stockholm, 03/ April/ 2012

Dear WHO Secretariat,

Active – sobriety, friendship and peace has closely followed the global and European political and research processes to prevent and control the burden of Non-Communicable Diseases (NCDs). To come to terms with NCDs prevention and control we have seen momentum building up ever since the Moscow Declaration from the first global Ministerial Conference on healthy lifestyles and NCDs control, in April 2011. The political will of Member States to take action for the prevention and control of NCDs became clear when the United Nations high-level meeting on NCDs prevention and control – the meeting in September 2011 being the second time in history of the UN that the General Assembly meets on a health issue – adopted a political declaration on the prevention and control of NCDs.

Active – sobriety, friendship and peace has been contributing to these processes both on international level, and on European and national level, through our member organizations to share with relevant institutions our expertise, knowledge and first-hand experiences and evidence of the problems and burden NCDs put on societies all over the world.

Conflict of Interests in efforts to prevent Non-Communicable Diseases

Part of Active – sobriety, friendship and peace’s commitment to preventing and controlling NCDs was also to be a signatory and to mobilize broad support for the
Conflicts of Interest Coalition Statement of Concern in advance to the UN high level meeting in September 2011.

As long as there are economic profit interests in increased consumption of products that are big risk factors for Non-Communicable Diseases – like among others alcohol and tobacco – it will be paradoxical to engage these kinds of industries in policy processes that necessarily have to take measures to decrease consumption.

Active – sobriety, friendship and peace is concerned about this conflict of public health and societal development interests of member states and regions all over the world on the one hand and economic profit interests of affected industries on the other hand.

Therefore we once more want to emphasize that:

Clarity is needed regarding the role of the private, profit-driven sector in public policy-making in relation to preventing and controlling NCDs.

Preventing and controlling NCDs is a public health, social and economic issue for societies all over the world. Policy decisions thus should be taken based on the best interest for the citizens of the respective society – in order to improve productivity, well-being, social capital and the ability of communities and societies at large to solve problems and move towards a better future.

We call for the development of a Code of Conduct and Ethical Framework to help protect the integrity of, and to ensure transparency in, public policy decision-making, by safeguarding against, identifying and eliminating conflicts of interests.

Active – sobriety, friendship and peace has experience of more than 20 years of work in policy areas of public health, social affairs, and Human Rights and thus we know
that evidence-based policy decisions of Member States to prevent and control NCDs do have positive impact on the productivity of the society, the well-being of citizens and communities, the social capital at large and the ability of communities and societies in general to move towards a better future – if the Best Interest of Children, as Member States have themselves committed to when ratifying the Convention of the Rights of the Child, is given primary consideration.

**Alcohol industry profit interests versus public health and societal development interests**

There is a strong link between alcohol and NCDs, particularly cancer, cardiovascular disease, liver disease, pancreatitis and diabetes. All scientific evidence supports calls by the WHO and other global and regional bodies to implement evidence-based policies to prevent alcohol related harm. Of the global NCD-related burden of deaths, net years of life lost (YLL) and net disability adjusted life years (DALYs), 3.4%, 5% and 2.4% respectively can be attributed to alcohol consumption. Therefore the World Bank for example recommends measures like “increase taxes”, “ban advertising” and “restrict access”.

In the face of this evidence and these recommendations Active – sobriety, friendship and peace is keen on emphasizing:

**The global alcohol industry has a track record of promoting ineffective and costly policy measures, as well as advertising their products aggressively in countries all over the world.**

**Therefore, we and our members across Europe have the concern that the alcohol industry or their front organizations should not be part of any public-private partnerships or policy formulations processes.**
The WHO Expert Committee on Problems Related to Alcohol Consumption (Geneva, 10-13 October 2006) point out that significant commercial interests are involved in promoting alcohol’s manufacture, distribution, pricing and sale. The alcohol industry, and their front organizations – especially funded national, regional and global “social aspects” organizations which sponsor industry friendly views on alcohol problems and policies – undermines WHO efforts, in the disguise of contributing to public health. The proposed policies serve the alcohol industry’s profit interests at the expense of public health, burdening societies with tremendous harm and suffering. The WHO Expert Committee cautioned that the private sector should not be trying to do the work of governments, which are properly the guardians of the public interest.

In a series of reports The Lancet in 2009, Beaglehole and Bonita point out that the potential for increased harm from alcohol is high, in view of the predatory nature of the alcohol industry. In the same series of reports Casswell and Thamarangsi analyse how alcohol producers have been consolidated and globalized, such that the international market is now dominated by a few large corporations with enormous financial resources and sophisticated marketing techniques, often directly targeting children and young people.

Just recently U.K. study found that children as young as 10 are more familiar with alcohol brands than with snack brands. The survey conducted by Alcohol Concern found that twice as many children recognized Carlsberg (for beer) than Mr. Kipling (for cake). The research found that 79% recognized Carlsberg as alcoholic, whereas 74% knew Ben & Jerry's for ice cream, and 41% knew Mr. Kipling for food.
Furthermore, nearly 80% recognized the Smirnoff vodka label for what it was.
In her recent speech the WHO Director General, Margaret Chan, strongly favors non-cooperation with the tobacco industry.
From a European perspective, but knowing that these problems are existent all over the world and even more likely in countries with weaker institutions, Active – sobriety, friendship and peace wants to draw attention to the following fact shown by the Eurobarometer, November 2009, on Corruption:
“The close links between business and politics is the most common cause Europeans give for corruption, followed by insufficient action by governments to prevent corruption...”. Therefore, we want to emphasize that governments can do more and better, to guard the public interest, especially public health, societal development and the Best Interest of the Child (Convention of the Rights of the Child Art. 3). Like the tobacco industry, the alcohol industry has conflicting interests and should not be a cooperating partner.

Kristína Šperková
Secretary General