

Appendix 9 – Example consultation response

Updated Action Plan for the Global Strategy for the Prevention and Control of Noncommunicable Diseases - 2013-2020

Response to WHO consultation

About IASO

The International Association for the Study of Obesity (IASO) is a not-for-profit organisation linking over 50 regional and national associations with over 10,000 professional members in scientific, medical and research organisations. It is an umbrella organisation for 53 national obesity associations, representing 56 countries, along with a policy analysis body, the International Obesity TaskForce (IOTF). The headquarters are in London, UK.

IASO is officially recognised as a non-governmental organisation by the WHO. Our mission statement is "To improve global health by promoting the understanding of obesity and weight-related diseases through scientific research and dialogue, whilst encouraging the development of effective policies for their prevention and management."

For further information see www.iaso.org and www.iotf.org

General comments on the updated Global Action Plan

IASO welcomes the opportunity to contribute to this consultation exercise on the Global Action Plan for NCDs 2013-20. We support the proposed objectives in the action plan, and we endorse the amendments and suggestions proposed by World Cancer Research Fund International and the UK National Heart Forum in their detailed responses.

However, we are disappointed that reference to obesity is limited to two sentences on page 21, with no clear policy options specifically aimed at reducing and preventing excess bodyweight. This is a serious omission, given the importance of excess body weight in a wide range of chronic diseases – for example bodyweight has a greater impact on hypertension than does dietary sodium, and bodyweight has a greater impact on liver disease than alcohol consumption.

We also draw attention to the recent analytical document on best buys and cost-effectiveness in public health circulated at the WHO EURO Regional Assembly 2012 (see http://www.euro.who.int/__data/assets/pdf_file/0009/171819/The-Economic-Case-for-Public-Health-Action.pdf) which includes reductions of child exposure to food and beverage marketing as a cost effective intervention, an intervention which appears to have fallen off the list of best buys in recent WHO documentation. Lastly, we urge WHO to develop a more coherent set of actions to improve nutrition in terms of upstream drivers of the diet, including food availability, food affordability and food acceptability to comprehensively reduce risk, and to support the development of goals and monitoring mechanisms to assist the control and governance of these drivers.

Answers to specific questions

Part 1: Accelerate national responses

Which recommended actions for Member States would generate a national political commitment on how to contribute to a global target of a 25% reduction in premature mortality from NCDs by 2025?

- Advocacy and Communication: strengthen and sustain advocacy through the construction of a searchable database of public health interventions being attempted by member states and by authorities within member states, aimed at improving nutrition and preventing obesity.

Which recommended actions for Member States would strengthen the development and implementation of national multisectoral plans for the prevention and control of NCDs? (including national targets and indicators, and actions to strengthen surveillance and monitoring systems).

- Increased surveillance of the drivers of health behaviour and the shapers of environments that affect health, including the role of commercial operators and the development of food and beverage markets.

Which recommended actions for the WHO Secretariat could be included in the 2013 to 2020 Action Plan to strengthen the capacity of Member States in mobilizing a whole-of-government response to NCDs?

- Member states need to establish coordinating authorities able to propose interventions and monitor their effects. WHO should strengthen its capacity to provide technical support to such authorities.

Which recommended actions for Member States would increase and prioritize budgetary allocations for addressing NCDs? (including through an increase in taxation on tobacco and alcohol)

- This is an opportunity to warn member states to be extremely cautious in their development of public-private partnerships, and to have clear mechanisms for dealing with potential conflicts of interest. WHO has some experience in this and could provide technical support.

Which recommended actions for international partners would increase the provision of adequate, predictable and sustained resources through bilateral and multilateral channels to support national NCD efforts?

- Again, the appropriate warnings and mechanisms are needed to manage the potential conflicts of interest.

Part 2: Roles and responsibilities of civil society and the private sector?

What are the recommended actions for NGOs and civil society that can contribute to the achievement of a 25% global reduction in premature mortality from NCDs by 2025?

- NGOs have a key role to play in policy development and in providing a counterweight to the influence of commercial sponsors. NGOs need to be encouraged to monitor and evaluate the actions of the various stakeholders, and to develop their role as 'critical friends' of public authorities and multilateral agencies.

Achievement of a 25% global reduction in premature mortality from NCDs by 2025, in particular with regards to:

- In the case of products which are likely to increase the risk of diet-related ill-health, the private sector should be held to have a duty of care to reduce the exposure of its customers to these products. This includes restricting their marketing communications, reformulating their products and providing clear labelling guidance.

Part 3: Partnerships

What functions should global and national partnerships for the prevention and control of NCDs include, in addition to the five identified in paragraph 18 of WHA paper A65/7?

- Clear procedural transparency is needed to reduce the risks inherent in partnerships having, or appearing to have, conflicted interests.

How does the WHO Secretariat ensure synergies between the recommended actions to promote partnerships to be included in the 2013 to 2020 Action Plan and the outcomes of discussions at the UN General Assembly before the end of 2012 in relation to WHO's inputs into the report of the UN Secretary-General on options for strengthening multi-sectoral action for the prevention and control of NCDs through effective partnership?

- WHO needs to lead a coordinating body across the UN agencies, which answers to member states through the usual channels and which specifically receives input from a range of stake-holding organisations, including those with academic expertise and those with advocacy and policy development experience. Input from commercial operators needs to be carefully handled using open and transparent processes for managing potential conflicting interests.

Part 4: Monitoring

Which recommended actions for the WHO Secretariat should be given priority in the 2013 to 2020 Action Plan to monitor the implementation of the 2013 to 2020 Action Plan and evaluate its results?

- We trust that monitoring will include the monitoring of policy development and implementation, and the monitoring of market developments and market influence that shape health behaviours.

Part 5: Post-2015 UN development agenda

Which recommended actions for Member States, international partners and the WHO Secretariat should the 2013 to 2020 Action Plan include in order to ensure that NCDs continue to be included in the discussions on the post-2015 UN development agenda?

As others have indicated, the WHO needs to be bold in its development and coordination of health policies through other UN agencies. It will have strong support for these moves from many of the health-related NGOs.