

IAS response to web consultation on WHO Independent High-Level Commission on NCDs draft report

The Institute of Alcohol Studies (IAS) welcomes the opportunity to respond to this web-based consultation on the draft report from the WHO Independent High-Level Commission on NCDs. We recognise the global burden of NCDs and support WHO in its efforts to combat this pressing challenge.

About IAS

The Institute of Alcohol Studies is an independent institute bringing together evidence, policy and practice from home and abroad to promote an informed debate on alcohol's impact on society. Our purpose is to advance the use of the best available evidence in public policy decisions on alcohol. For more information please visit www.ias.org.uk

Consultation response: Key points

IAS wishes to raise the following key points in response to this consultation that relate to the prevention and reduction of alcohol-related NCDs:

1. Action on alcohol presents an opportunity for significant health gains

The Commission's report is honest in its recognition of a lack of progress in combatting NCDs worldwide. This recognition highlights the urgency of a need for increased action on preventing NCDs. Each year 3.3 million deaths are attributable to alcohol, and alcohol is responsible for 5.1% of the global burden of disease and injuryⁱ. Action on alcohol, which is one of four leading modifiable risk factors for NCDs, presents an opportunity to make significant health gains.

2. Recommendation 1: Action on alcohol harm must be included

Given that alcohol use is one of the four leading modifiable risk factors for NCDs, tackling alcohol harm must be included as a priority in Recommendation 1. The absence of a reference to alcohol in this recommendation is problematic. IAS suggests adding a sixth priority to 1(a): 'Implementing best-buy policies to reduce alcohol harm'. We also suggest amending the final recommendation in 1(a) to: 'Scaling up screening for and treatment of depression and co-occurring conditions such as substance-use disorders in primary health care'.

3. Conflicts of interest and commercial determinants of health

The role of unhealthy commodity industries and commercial determinants of health must be acknowledged as one of the key challenges to progress in tackling NCDs. With reference to partnerships with the private sector, IAS joins calls from civil society organisations for the WHO to ensure that health policy is protected from vested interests, in particular producers of unhealthy commodities such as alcohol, soft drinks, infant formula and processed foods high in fat, salt and sugarⁱⁱ. IAS recommends that the report include a reference to the importance of protection against and management of conflicts of interest when engaging with the private sector.

4. Financing

IAS welcomes the call for increased taxation on tobacco and alcohol products. These fiscal measures have strong evidence of effectiveness at reducing disease burden and tackling health inequalities. Alcohol and tobacco taxes also present opportunities for government funding of health initiatives.

The suggested proposal for a Global Solidarity Tobacco and Alcohol Contribution is interesting and may help provide financial support for tackling NCDs globally. IAS would welcome more details on the thinking behind this suggestion and from where voluntary contributions would be expected/anticipated. It is noted that this suggestion makes no reference to preventing any potential conflicts of interest which may arise through financial contributions. Explicit reference should be made outlining that funding from tobacco, alcohol and other unhealthy commodity industry bodies would not be accepted.

For further information please contact Katherine Brown, Chief Executive, Institute of Alcohol Studies at kbrown@ias.org.uk

**Institute of Alcohol Studies
London, 16 May 2018.**

ⁱ World Health Organization (2016), Global status report on alcohol and health 2014. Available from: http://www.who.int/substance_abuse/publications/global_alcohol_report/en/ [Accessed 16 May 2018].

ⁱⁱ Conflict of Interest Coalition Statement of Concern, http://info.babymilkaction.org/sites/info.babymilkaction.org/files/COIC150_0.pdf [Accessed 16 May 2018].