

FCA SUBMISSION ON WHO CONSULTATIONS ON NCDs, APRIL 2012

The Framework Convention Alliance (FCA) welcomes this opportunity to contribute to WHO's consultations on the commitments made in the Political Declaration on the prevention and control of non-communicable diseases (NCDs); A/RES/66/2. Our comments focus on proposals regarding:

- A.** A comprehensive global monitoring framework, including indicators, and a set of voluntary global targets for the prevention and control of NCDs
- B.** Options for strengthening and facilitating multisectoral action for the prevention and control of NCDs through partnership

FCA would like to take this opportunity to reiterate its full support for WHO's efforts to strengthen the WHO Framework Convention on Tobacco Control (FCTC) and its implementation. FCA is made up of over 350 non-governmental organisations from more than 100 countries working on the development, ratification and implementation of the WHO (FCTC).

Tobacco use is the one risk factor common to the main groups of NCDs.

A comprehensive global monitoring framework, including indicators, and a set of voluntary global targets for the prevention and control of NCDs

Key Elements of a Global Monitoring Framework

FCA would like to encourage WHO and Member States to be bold and set aspirational targets that will drive progress in the prevention and control of NCDs for the next 15 years. In this respect, FCA supports the adoption of an overarching goal at the 65th World Health Assembly (WHA) in May 2012 to reduce preventable deaths from NCDs by 25 per cent by the year 2025.

Target and Indicators: Tobacco

FCA notes the updated proposal for a specific target for tobacco: a 30 per cent relative reduction from current levels in the prevalence of tobacco smoking. Achieving this target will require immediate, forceful action and accelerated implementation of the FCTC, including progress on tobacco tax and price measures as recognised in the Political Declaration.

To be effective in reducing the prevalence of tobacco use, a global target should be broken down into regional (and possibly sub-regional and national) targets to take into account differences in circumstances, and stages in the tobacco epidemic. Hence, FCA stresses the importance of rapidly arriving at interim targets that would actually put countries on trajectories to achieving the voluntary targets by 2025.

In terms of monitoring progress against the tobacco smoking target, FCA wishes to highlight that both areas – process and impact – should be monitored. As a result, FCA believes that the creation of additional indicators

focusing on the implementation of tobacco control policies outlined in the WHO FCTC should be further discussed. These additional indicators should be selected in consultations with WHO Member States and the FCTC's Conference of the Parties (COP), as well as other stakeholders.

Monitoring

Real, measurable progress will be critical in generating the political will necessary for achieving any proposed tobacco control targets. The WHO FCTC COP is the primary global forum for discussions on tobacco control implementation and accountability.

FCA believes that the role of the FCTC COP should be explicitly recognised in the WHO Global Monitoring Framework. Decision 16 of the last (fourth) Session of the FCTC COP (COP4) invites WHO “to use the data received through Parties’ implementation reports as a principal source of information for relevant surveillance and monitoring activities, avoiding the use of a parallel international system for regular collection of data concerning tobacco control”.

In this respect, FCA would like to reiterate its recommendation that further effort should be made to harmonise WHO and FCTC COP reporting mechanisms.

Options for strengthening and facilitating multisectoral action for the prevention and control of NCDs through partnership

Multi-sectoral Action for NCDs

Multi-sectoral and multi-stakeholder action is critical to the prevention and control of NCDs, as well as to free the world from the devastating health, social, economic and environmental consequences of tobacco and tobacco use.

FCA’s experience in the field of tobacco control shows that strong and successful tobacco control, for instance tobacco tax policy, requires the commitment and cooperation of numerous sectors: health, trade, customs and finance to name a few; be this at the country level, regionally or globally.

Framework for Multi-sectoral Action for Tobacco Control

Frameworks for effective multi-sectoral action on NCDs need to be further refined. However, they should build upon already established instruments. For example, a framework for multi-sectoral action on tobacco control exists – the WHO Framework Convention on Tobacco Control (FCTC).

FCA strongly urges WHO and all Member States to ensure that all tobacco control efforts within broader NCD actions – global, regional and national – are in line with FCTC articles, guidelines and recommendations.

Protection of Health Policy from the Vested Interests of the Tobacco Industry and from Personal, Professional, Financial, or Business Interests which Are Not Aligned with Agreed Public Health Goals

Recalling the fundamental conflict of interest between the tobacco industry and public health, FCA calls upon all WHO Member States and other stakeholders to develop guidelines and codes of conduct that will ensure full transparency in their engagement with all NCDs stakeholders, and avoid any real or perceived conflict of interest.