

## FCA POSITION ON THE INTERIM REPORT OF THE WHO WORKING GROUP ON FINANCING FOR NCDs

The Framework Convention Alliance (FCA) for Tobacco Control welcomes the Interim Report developed by the WHO Working Group on Financing for NCDs and would like to provide comments on the following four topics: tobacco industry interference, tobacco taxation, financial resources and international cooperation for implementation of the WHO Framework Convention on Tobacco Control (FCTC).

### ***Tobacco industry interference***

Under its Recommendation 4 (on investment from private business and finance) the Working Group recognizes the fundamental conflict of interest between the tobacco industry and public health. The Working Group should explicitly recommend that governments proactively establish and implement policies to protect public health measures from tobacco industry interference, including throughout processes and policies on resource allocation and budgeting for tobacco control.

The broad array of strategies and tactics used by the tobacco industry to interfere with the setting and implementing of tobacco control measures is extensively documented<sup>1</sup>. Tobacco industry interference can undermine allocation of resources, including through budget cuts, for tobacco control activities<sup>2</sup>. To ensure that appropriate resources are allocated for tobacco control, tobacco industry interference must be addressed at all levels of government, in line with Guidelines on implementation of Article 5.3 of the FCTC<sup>3</sup>.

### ***Tobacco taxation***

We are pleased to note repeated references to tobacco taxes in the Interim Report, particularly under Recommendation 2 (on domestic public resources). Nevertheless, we call on the Working Group to emphasize that in setting their tobacco tax policies, governments should make full use of Guidelines on implementation of Article 6 of the FCTC<sup>4</sup>.

The Guidelines on implementation of Article 6 were negotiated between all the Parties to the FCTC, establishing best practices in tobacco taxation. The Guidelines were adopted by consensus in late 2014, at the sixth session of the FCTC Conference of the Parties (COP6)<sup>5</sup>. They provide a useful tool to all governments in setting their tobacco tax policies. Moreover, the Guidelines include, among many, a recommendation that “Parties could consider ... dedicating revenue to tobacco-control programmes ... and financing of appropriate structures for tobacco control”<sup>6</sup>.

---

<sup>1</sup> WHO (2009). Tobacco industry interference with tobacco control. WHO: Switzerland

<sup>2</sup> Landman A, Bialick P. Tobacco Industry Involvement in Colorado. Tobacco Control, 2004. UC San Francisco: Center for Tobacco Control Research and Education. Accessed 28 August 2015. <http://escholarship.org/uc/item/9d88044>

<sup>3</sup> The guidelines are available on FCTC website: [http://www.who.int/fctc/treaty\\_instruments/adopted/article\\_5\\_3/en/](http://www.who.int/fctc/treaty_instruments/adopted/article_5_3/en/)

<sup>4</sup> The guidelines are available on FCTC website:

[http://www.who.int/fctc/treaty\\_instruments/Guidelines\\_Article\\_6\\_English.pdf?ua=1](http://www.who.int/fctc/treaty_instruments/Guidelines_Article_6_English.pdf?ua=1)

<sup>5</sup> COP6 decision FCTC/COP6(5)

<sup>6</sup> Ibid, section 5 (page 13)

Recommendations contained in the Article 6 Guidelines should be promoted particularly in the light of the recently adopted Addis Ababa Action Agenda<sup>7</sup>. At the Third International Conference on Financing for Development (FfD3) governments recognized that “as part of a comprehensive strategy of prevention and control [of NCDs], price and tax measures on tobacco can be an effective and important means to reduce tobacco consumption and health-care costs and represent a revenue stream for financing for development in many countries”<sup>8</sup>.

As a result, FCA also wishes to encourage the Working Group to advise the Director-General on specific means and ways in which WHO, in cooperation with various United Nations agencies and other stakeholders, could promote the health and economic benefits of tobacco taxes. We welcome work undertaken by the FCTC Secretariat and WHO in the lead-up to the FfD3 and encourage further coordination of efforts in this regard<sup>9</sup>.

The economic and health benefits of tobacco taxes should be particularly promoted at various development events and with bilateral and multilateral development agencies. By supporting countries to establish effective tobacco tax policies, donor countries can scale up national capacities to generate domestic resources for tobacco control and enhance the catalytic role of official development assistance. We encourage the Working Group to propose specific means and ways in which WHO and the Director-General can assist both donor and recipient countries to engage in cooperation on tobacco tax policies.

### ***Financial resources and international cooperation for implementation of the FCTC***

Finally, FCA repeats its recommendation to the Working Group to coordinate its activities with the FCTC Working Group on Sustainable Measures to Strengthen Implementation of the Convention<sup>10</sup>. The FCTC Working Group was set up in 2012 in response to persistent challenges in mobilizing financial resources and international cooperation for FCTC implementation at all levels – country, regional, and global<sup>11</sup>.

Measures to mobilize international cooperation and financial resources for FCTC implementation are outlined in the Convention in Articles 22 and 26 respectively. Despite an existing legal obligation to engage in international cooperation on tobacco control and mobilize sufficient resources for FCTC implementation, investment in tobacco control in low- and middle-income countries remains far below WHO recommended levels<sup>12 13</sup>. The FCTC Working Group has already developed initial proposals to address this situation and will continue its work throughout 2015 and 2016.

In order to leverage existing knowledge and best practices, the WHO Working Group on Financing for NCDs should incorporate the findings and recommendations of the FCTC Working Group on Sustainable Measures in its deliberations.

---

<sup>7</sup> UN resolution A/RES/69/313

<sup>8</sup> Ibid, paragraph 32

<sup>9</sup> Namely releasing the following publication: <http://www.who.int/fctc/mediacentre/news/2015/WHOTobaccoReport.pdf?ua=1>

<sup>10</sup> Please see FCA’s submission to WHO on NCD financing from February 2015: [http://www.who.int/nmh/ncd-coordination-mechanism/ngo\\_framework\\_convention\\_alliance.pdf?ua=1](http://www.who.int/nmh/ncd-coordination-mechanism/ngo_framework_convention_alliance.pdf?ua=1)

<sup>11</sup> FCTC COP5 decision COP5/FCTC(14)

<sup>12</sup> WHO (2015) Report on the global tobacco epidemic: raising taxes on tobacco. WHO: Switzerland, p.90

<sup>13</sup> WHO (2011) Scaling up action on noncommunicable diseases: how much will it cost? WHO: Switzerland, p.17-18