

Key advocacy points in response to WHO ‘Working document for development of an action plan to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol’

20.11.20

GAPA proposed comments and suggestions to specific sections of the working document

On 16 November WHO released a Working document for development of an action plan to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol. The document is open for consultation until 6 December. The following are some observations, comments, and suggestions from the Global Alcohol Policy Alliance (GAPA) for civil society organisations and other entities with an encouragement to participate in the consultation. Further information is available in the ‘GAPA Principles for advocacy 2020-2022’ document released earlier this year. It is found on the GAPA website.

The consultation process asks for response to only the following question:

“We have read the working document for development of an action plan to strengthen implementation of the Global strategy to reduce the harmful use of alcohol and have the following comments and suggestions for consideration:”

There are many very positive aspects to the consultation document and GAPA applauds the work done to prepare the working document. The large number of action points and targets would, however, benefit from reduction in numbers and simplification of language.

We are concerned about the lack of specific time intervals for review and reporting of the implementation of the action plan, and given the importance of intergovernmental collaboration to reduce alcohol harm, GAPA would like to make the following recommendation:

It is recommended that the Director General be requested to report to the WHA biennially on the progress of implementing the Global Action Plan including any challenges faced by member states and the nature and extent of collaboration between UN agencies.

In addition, we make these specific comments:

Setting the Scene

Positive aspects:

- GAPA observes that some key points are made that are positive:
 1. influence of commercial interests on policy,
 2. global inequity due to lack of policy in LMICs,
 3. lack of implementation of Global strategy
 4. lack of legally binding regulatory instruments at the international level
 5. recognition of the lack of resources
 6. strong, updated evidence endorsed by WHA for the “best buys”

To these points, some examples from the Working document with comments and suggestions are listed below:

1. Influence of commercial interests on policy,

eg ‘Strong international leadership is needed to counter interference of commercial interests in alcohol policy development and implementation in order to prioritize the public health agenda for alcohol in the face of a strong global industry and commercial interests.’

Working document page 4

GAPA suggestion: Good to support this with reference to examples of influence in region/country and published literature.

2. Global inequity due to lack of policy in LMICs

eg ‘The disproportionate prevalence of effective alcohol control measures in higher-income countries raises questions about global health equity; it underscores the need for more resources and greater priority to be allocated to support the development and implementation of effective policies and actions in low- and middle-income countries.’

Working document page 2

GAPA suggestion: Reinforce emphasis on need for global health equity with examples of lack of adequate policy in LMICs and need for a multi-lateral response to support a strong global response.

Also, add ... ‘and evaluation of potentially’ after ‘implementation – ‘... and greater priority to be allocated to support the development, implementation and evaluation of potentially effective policies and actions in low- and middle-income countries.’

3. Lack of implementation of Global strategy

eg ‘the implementation of the Global Strategy has not resulted in considerable reductions in alcohol-related morbidity and mortality and the ensuing social consequences. Globally, the levels of alcohol consumption and alcohol-attributable harm continue to be unacceptably high’.

Working document page 3

GAPA suggestion: Highlight lack of attention paid to Global Strategy in own regions/countries and the lack of resources to support its implementation.

4. Lack of legally binding regulatory instruments at the international level

eg ‘Alcohol remains the only psychoactive and dependence-producing substance that exerts a significant impact on global population health that is not controlled at the international level by legally-binding regulatory instruments.’

Working document page 4

GAPA suggestion: Support this observation and the ‘calls for a global normative law on alcohol at the intergovernmental level, modelled on the WHO Framework Convention on Tobacco Control,’

5. Recognition of the lack of resources

eg ‘Limited technical capacity, human resources and funding hinder efforts in developing, implementing, enforcing and monitoring effective alcohol control interventions at all levels.’

Working document page 5

GAPA suggestion: Support this observation and underline the need for member state to adequately fund the WHO work on alcohol. There is urgent need for increased resources and expertise at WHO, particularly within the Alcohol and Drugs unit.

6. Strong, updated evidence endorsed by WHA for the “best buys”

eg ‘Evidence on the cost-effectiveness of alcohol policy options and interventions was updated in a revision of Appendix 3 to the NCD global action plan, and this appendix was endorsed by the Health Assembly in Resolution WHA70.11 (2017). [...] “best buys”, include increasing taxes on alcoholic beverages, enacting and enforcing bans or comprehensive restrictions on exposure to alcohol advertising across multiple types of media, and enacting and enforcing restrictions on the physical availability of retailed alcohol.’

Working document page 2

GAPA suggestion: Underline the importance of the best buys and request that they be sufficiently highlighted in the ‘Key areas for global action’.

Negative aspects:

- This section lacks:
 1. information on the corporate strategies of the Trans National Alcohol Corporations (TNACS) including their targeting of LMICs for growth in sales.
 2. projections of increases in consumption and harm (Manthey et al, 2019¹)

¹ Manthey J, Shield KD, Rylett M, Hasan OSM, Probst C, Rehm J. Global alcohol exposure between 1990 and 2017 and forecasts until 2030: a modelling study. *Lancet*. 2019;393(10190):2493-2502. doi:[10.1016/s0140-6736\(18\)32744-2](https://doi.org/10.1016/s0140-6736(18)32744-2)

3. that there is no regulation of TNACs and digital platforms which are used to target vulnerable consumers
4. sensitivity to cultures and populations where alcohol is not an embedded part of the culture

GAPA suggestion: Highlight the need to cover the above-mentioned aspects in the 'Setting the Scene' section.

Re. no. 4. Sensitivity to cultures where alcohol is not an embedded part of the culture:

eg 'The drinking of alcoholic beverages is strongly embedded in the social norms and cultural traditions of many societies.'

Working document page 4

GAPA suggestion: Refer to the fact that in many cultures and populations non-drinking is the norm. It should also be noted that cultural traditions of alcohol use are grounded in informal or small scale production of alcohol and these are now replaced by large scale commercial production, distribution and marketing of global alcohol brands, which use all the technologies of modern production and marketing to drive up alcohol consumption, with attendant increased risks for harm.

Opportunities for Reducing the Harmful Use of Alcohol

Shortcomings:

- This section does not adequately cover the need for and nature of an international response in line with the Aims of the Global strategy (Box 1)

Ref 'Aims' of the Global strategy: to give guidance for actions at all levels; to set priority areas for global action;

Working document page 1

GAPA suggestion: Highlight the need to focus on the global aspects of the Global strategy. Although this is outlined in the 'Scope of the Action Plan' section it should be reflected more strongly in the 'Operational objectives of the Action Plan' and in the 'Key Areas for Global Action'.

PROPOSED OPERATIONAL OBJECTIVES FOR THE ACTION PLAN, GUIDING PRINCIPLES AND KEY AREAS FOR GLOBAL ACTION

Operational objectives of the action plan:

Positive aspects:

- Operational objective 1 focuses on the 'high impact policy options'
- Operational objective 6 points to the need to increase resources

Shortcomings:

- The need for global action and an international response should be highlighted.
- Objectives 4 and 5 are overlapping and no. 5 should be adjusted to have a clearer accountability objective.

GAPA suggestion: Highlight the need for accountability measures to be included in the action plan.

Operational Principles for Global Action

Positive aspects:

- The principles include important principles:
 - ‘equity-based approach’ and
 - ‘protect from commercial interests’.

Negative aspects:

- The important principles are not followed through in actions

GAPA suggestion: Underline that the equity-based approach and protect from commercial interest be given a clearer bearing on the design and content of the Action areas

Goals of the Action Plan

The Working document points out:

‘Effective implementation of the action plan at regional levels may require development or elaboration and adaptation of region-specific action plans.’

Working document page 7

GAPA suggestion: The need for regional plans should be reflected more strongly in the Global Action Plan, by replacing ‘may’ with ‘will’ in this section. It could also help identify the regions which will be targeted by commercial interests.

Key Areas for Global Action

GAPA supports the strong focus under Action area 1 of ‘effective and cost-effective policy options’ included in the WHO-led SAFER initiative; the recommendation to implement these cost-effective policies and the related target. Is it possible for a percentage of LMICs to be specified?

Action area 1, Action 1 for MS. Based on the evidence of effectiveness and cost-effectiveness of policy measures, to prioritize sustainable implementation, continued

enforcement, monitoring and evaluation of high-impact policy options included in the WHO SAFER technical package.

Working document page 12

GAPA supports the reference to protection from interference from commercial interests as a responsibility of member states:

Action area 1, Action 2 for MS. Ensure that development, implementation and evaluation of alcohol policy measures are based on public health goals and the best available evidence and are protected from interference from commercial interests.

Working document page 12

GAPA supports this statement asking for economic operators to refrain from policy interference:

Action area 3, Action 3 for NSA. Economic operators in alcohol production and trade are invited to focus on their core roles as developers, producers, distributors, marketers and sellers of alcoholic beverages, and abstain from interfering with alcohol policy development and evaluation.

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but should be rewritten to include:

abstain from engaging in and/or interfering with

GAPA suggestion: The Working document says Global status reports on alcohol and health will be prepared every 4-5 years – we should ask for more frequent reports than that, or the problem gets buried. The tobacco status reports come out every two years.

Action area 2, Action 4 for WHO Secretariat: Prepare and disseminate every 4–5 years global status reports on alcohol and health to raise awareness of the alcohol-attributable burden and advocate for appropriate action at all levels.

GAPA suggestion: At no stage in the action points is there any mention of a role for the Secretariat in monitoring and countering commercial interests' interference with public health policy. This is urgently needed. The responsibility for monitoring and reporting interference from commercial interest is given solely to civil society:

Action area 2, Action 2 for NSA. Civil society organizations, professional associations and academia are invited to monitor activities which undermine effective public health measures

Working document page 14

Action area 3, Action 2 for NSA. Civil society organizations, professional associations and academia are invited to prioritise and strengthen their activities on reducing the harmful use of alcohol, by monitoring and countering undue influences from commercial vested interests that undermine attainment of public health objectives

Working document page 16

GAPA does not support: The structure of the action statements includes a role for economic operators as if they are equivalent to other non-state actors; this is not supported. It leads to ‘invitations’ to the economic operators which seem ignorant of their commercial responsibilities to shareholders and the reliance for substantial sales on heavy drinking occasions and individuals with alcohol use disorder, for example,

Action area 1, Action 3 for NSA. Economic operators in alcohol production and trade, as well as economic operators in other relevant sectors (such as retail, advertisements, social media and communication), are encouraged to contribute to the elimination of marketing and sales of alcoholic beverages to minors and targeted commercial activities towards other high-risk groups

Working document page 12

Action area 2, Action 3 for NSA. Economic operators in alcohol production and trade as well as operators in other relevant sectors of the economy are invited to take concrete steps, where relevant [to] refrain from promoting drinking,

Working document page 14

GAPA suggestion: The invitation to the economic operators to cease funding research for lobbying purposes lacks clarity. There is a risk that the producers, their social aspect public relations organisations (SAPROs) and Trade Groups will see this as another opportunity to fill the vacuum and sponsor more activities that encourage “responsible drinking.” That is not acceptable. A better approach might be to recommend to civil society and academia not to enter into formal and informal partnerships with industry and underline that alcohol industry funding not be accepted.

Action area 6, Action 3 for NSA. Economic operators in alcohol production and trade are invited to allocate resources for implementation of measures that can contribute to reducing the harmful use of alcohol within their core roles, and to refrain from direct funding of public health and policy-related research to prevent any potential bias in agenda-setting emerging from the conflict of interest, and cease sponsorship of scientific research for marketing or lobbying purposes.

Working document page 22

GAPA supports the proposal for member states to increase awareness of the health risks of alcohol use and related overall impact on health and well-being. The option to implement a national alcohol awareness day, however, is not sufficient and should be replaced with an alcohol awareness week.

Action Area 2, action 6 for member states: ... including an option of a national alcohol awareness day to be implemented by public health agencies and organizations and involving countering misinformation and using targeted communication channels, including social media platforms.

Working document page 14

GAPA points out: It is positive to have mention of trade and investment agreements but the action for the Secretariat below is not clear:

Action area 2, Action 7 for WHO Secretariat. To facilitate dialogue and information exchange regarding the impact of international aspects of the alcohol market on the alcohol-attributable health burden, advocate for appropriate consideration of these aspects by parties in international trade negotiations and seek international solutions within the WHO's mandate if appropriate actions to protect the health of populations cannot be implemented.

Working document page 14

GAPA supports the recommendations for monitoring and reporting, including the reconvening of the WHO Expert Committee, see below:

Action area 4, Action 7 for WHO Secretariat. Reconvene the WHO Expert Committee on Problems Related to Alcohol Consumption for a comprehensive review of the accumulated evidence on feasible and effective measures to address the harmful use of alcohol, and provide recommendations on the way forward to strengthen implementation of the Global Strategy.

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However, this should be rewritten to provide a broader mandate:

and provide recommendations on the way forward.

GAPA supports the focus on Resource Mobilisation and applauds invitation to UN agencies to maintain independence from funding from alcohol producers and distributors. Given that transnational alcohol corporations have contributed funding to UN agencies through their corporate social responsibility initiatives, this needs to be highlighted.

Action area 6, Action 1 for NSA. Major partners within the United Nations system and intergovernmental organizations are invited to mainstream their efforts to reduce the harmful use of alcohol in their developmental and public health strategies and action plans and to promote and support financing policies and interventions to ensure the availability of adequate resources for accelerated implementation of the Global Strategy while maintaining independence from funding from alcohol producers and distributors.

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