Statement to FADAB on 1st Draft of WHO Action Plan on implementation of the global alcohol strategy

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NCDA's brief statement to the 3rd WHO Forum on Alcohol Drugs and Addictive Behaviour session on the 1st Draft of WHO Global Action Plan 2022-2030 to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol

Consultation Responses and Comments

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FADAB2021 Alcohol Action Plan Consultation NCDAlliance Statement June2021.pdf [1]

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Extended Description: A summary of NCDA's remarks to the 3rd WHO Forum on Alcohol Drugs and Addictive Behaviour in June 2021 on the 1st Draft of WHO Global Action Plan 2022-2030 to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol.

We thank and commend the WHO secretariat and contributors for the work on the enlightening cross border marketing report and the draft alcohol action plan, and appreciate the Secretariat's efforts to listen to civil society and address concerns and integrate recommendations.

As SAFER Initiative partners, we welcome efforts to give SAFER more prominence in the current version of the action plan and appreciate the inclusion of ambitious targets and specific proposed actions.

We also commend articulation of specific, and strengthened global targets. However, despite improved regularity of reporting, we would urge introduction of a review point on the progress of the Action Plan with scope to make amendments to the Action Plan should progress toward targets be off track.

We commend the separation of economic actors from other stakeholders, however we reiterate our concerns about risks inherent in involving industry in alcohol policy processes and implementation. Without further differentiations and development of complementary WHO secretariat guidance on protecting against Conflict of Interest, there is a considerable risk of legitimising industry involvement when, since 2010's Global Alcohol Strategy was adopted, evidence has pointed to relevant economic operators undermining progress on alcohol policy and use due to their conflicted interests. A proposal to limit industry measures to a section will be more effective. On this basis, we believe industry measures should not be included in action area 1 for example.

Words and framing matter – and must be given the opportunity to be updated when better understood to be counterproductive. We understand that the language of "harmful use" is inherited from previous processes and documents like the 2010 global alcohol strategy but would like to stress that there is an opportunity here to align with

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the latest evidence and years of concerns raised by member states and experts around this problematic framing. We suggest consistently referring to "alcohol use and harm".

Lastly, we ask that the action plan places greater emphasis on the challenge of digital marketing and the infiltration of industry in communities and youth networks through sports and recreation. Given the similarity across the marketing practices of multiple harmful commodity industries (eg alcohol, ultra-processed food, gambling, etc), we suggest addition of an action for the Secretariat to coordinate efforts via WHO and other UN agencies to advance approaches to protect children from harmful marketing.

Related Resource: NCD Alliance Submission to WHO consultation on Working Document to develop an action plan for strengthening implementation of the WHO Global Strategy on the Harmful Use of Alcohol (GAS) [2]

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