

NCD Alliance Response to WHO Discussion Paper: Approach to register and publish the contributions of Non-State Actors to the achievement of the nine voluntary targets for NCDs

October 2016

The NCD Alliance welcomes the opportunity to comment on the WHO Discussion Paper on an *Approach to register and publish the contributions of Non-State Actors to the achievement of the nine voluntary targets for NCDs*.

General comments

- As clearly recognized in the 2011 UN Political Declaration and the WHO Global NCD Action Plan 2013-2020 (GAP) and highlighted by the Discussion Paper non-State Actors (NSAs), including civil society, play an important part in supporting national and international action on NCDs.
- While we appreciate the work of the GCM/NCD Secretariat acting on the mandate provided by the 2014 NCD Review Outcome Document to establish a framework to register and publish the contributions of NSAs to the achievement of the nine voluntary targets for NCDs, we note with concern that the approach as currently laid out in the Discussion Paper lacks specificity as to the **purpose, process of making commitments and monitoring and evaluation component** of the proposed register. Currently, the incentive for NSAs to register commitments is not made sufficiently clear, nor is the process for them to do so.
- In particular, we are concerned that the current scope, mandate and available resources of the GCM/NCD do not allow for critically assessing or, more importantly, **tracking the achievement of the commitments** made. In order for the register to be a useful tool the mandate of the GCM/NCD has to therefore be broadened to allow for the tracking of progress against SMART commitments.
- To this end we suggest rewording of paragraph 9 to clarify that the objective of this approach is not to “enable comparing different contributions” as this is neither feasible nor useful. The objective should be to encourage and track commitments to undertake specific activities toward the achievement of one or several NCD targets, but not to make comparisons across the commitments of different NSAs.
- We suggest that rather than “contributions” the approach should call for “commitments” and that these should be formulated as SMART commitments to ensure transparency and accountability (see also under “Output Indicators”). Formulating SMART commitments potentially brings stakeholders together in dialogue and enhances focus and clarity around key issues. While focused on nutrition the Global Nutrition Report SMART Guide is a useful resource that could further guide thinking around SMART commitments for NCDs¹.

¹ <http://globalnutritionreport.org/files/2016/03/SMART-guideline-GNR-2016.pdf>

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- We appreciate that the discussion paper clarifies that “in no way would the voluntary registration of the activity confer an endorsement of the non-State actor’s name, brand, product, views or the activity itself” and that commitments are welcomed only from non-State Actors (NSAs) “that commit to the objectives of the [WHO Global NCD] action plan including those that are demonstrably committed to promoting public health and are willing to participate in public reporting and accountability frameworks”. However, it is not clear what the mechanism and parameters will be for assessing whether these criteria are fulfilled. Furthermore, should the register not involve tracking of commitments, this disclaimer should be expanded to clarify that the public health outcomes of the activities registered are not quantified and known. A general “do no harm” principle could be added to the approach.
- In addition to emphasizing the non-engagement with the tobacco and arms industries, we recommend that paragraphs 11 and 16 quote paragraph 45 of the WHO Framework for Engagement with Non-State Actors (FENSA), which reads: “WHO will exercise particular caution, especially while conducting due diligence, risk assessment and risk management, when engaging with private sector entities and other non-State actors whose policies or activities are negatively affecting human health and are not in line with WHO’s policies, norms and standards, in particular those related to noncommunicable diseases and their determinants”. FENSA should directly guide the GCM/NCD’s work on the register of contributions and particular scrutiny should be applied to commitments made by the industries referenced in paragraph 45.
- We welcome that the current approach stipulates that “a non-State actor should consider only those objectives that address their core area of work, as appropriate”, but wish that the approach make clearer what is considered “not appropriate” in this context. **We emphasise that it is critical that commitments made by private sector entities that fall within paragraph 45 of FENSA are only allowed to register commitments that directly address their core business.** The register should not be a platform for promoting Corporate Social Responsibility initiatives by NSAs whose core business negatively affect health and NCDs.

Output Indicators

- We welcome that the agreed actions for international partners included in the WHO Global NCD Action Plan 2013-2020 (GAP) have been used as a basis to develop the proposed set of output indicators. However, in general, the current formulation of indicators would not allow for meaningful tracking of real progress against the six GAP objectives. We recommend that the Secretariat identifies concrete KPIs for each area e.g. as been done in some part under objective 3 to allow for comparison over time.
- While we welcome that more specific output indicators have been included under objective 3, we do not believe that these appropriately cover the WHO NCD risk factor strategies referenced. We are particularly concerned by the absence of output indicators on nutrition labeling, restrictions on marketing of unhealthy food and beverages etc. Furthermore, it is not clear to us how the 50% figure for price reductions for NCDs medicine has been established.

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- It should be clarified that any commitment registered should be SMART, i.e. Specific, Measurable, Achievable, Relevant, Time-bound. A detailed, practical guide to developing and monitoring commitments should be developed such as has been done by the GNR and other initiatives.
- Given the short time-span provided for this consultation we are unable to comment in greater detail on the table of output indicators. We believe that a robust set of output indicators is critical, but that their development will require more work by the WHO Secretariat based on a careful and critical analysis of lessons learnt from similar initiatives such as the EU Platform for action on diet, physical activity and health². Importantly, we recommend that further focused consultation, in particular with Member States (including via the Executive Board), academia and civil society is necessary.

² http://ec.europa.eu/health/nutrition_physical_activity/platform/index_en.htm

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