

## Joint submission to the call for comments on the draft WHO guideline on fiscal policies to promote healthy diets

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Language English

17 organizations working in the NCD space submitted a joint response to WHO's draft guideline on fiscal policies to promote healthy diets.

Consultation Responses and Comments



[Joint\\_NCDA\\_response\\_WHO\\_fiscal\\_policies\\_guideline\\_vFINAL.pdf](#) [1]

1 February, 2023

**Resource Section:** Statements, Submissions and Briefings

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**Extended Description:**

17 organizations working in the NCD space (NCD Alliance, The George Institute for Global Health, World Cancer Research Fund International, World Obesity Federation, Africa NCDs Network, Cameroon Civil Society NCD Alliance, Cancer Research UK, Ghana NCD Alliance, Healthy Caribbean Coalition, Healthy India Alliance, HRIDAY, International Association for Dental Research, International Diabetes Federation, Norwegian Cancer Society, Reconciliation and Development Association, Resolve to Save Lives and Walé Action Santé Population) submitted a joint response to WHO's draft guideline on fiscal policies to promote healthy diets.

In our joint submission:

1. We welcomed the recognition that Member States may benefit from further guidance to assist with establishing or strengthening different fiscal policies on food and non-alcoholic beverages (beyond taxes on sugar-sweetened beverages), as part of a broader package of policies to promote healthy diets to reduce the burden of diet-related noncommunicable diseases (NCDs).
2. We provided comments on the overall clarity of the guideline, some context and setting specific issues, additional considerations and implications for adaptation and implementation, and missing data. Our general comments were that the document raises important points that are unfortunately diluted within the current draft due to its length and repetition of content (for instance, the guideline includes pricing policies but that there is no recommendation on pricing policies due to no studies found on the effectiveness of these policies, and this is a very important point that is easily missed). Importantly, the document needs to be clearer and stronger on the policy recommendations it provides, indicating that the judgment of benefit from the policy recommendations is favorable, otherwise it risks diluting the importance of considering other fiscal policies for healthy diets beyond taxes on sugar-sweetened beverages.
3. Among other key recommendations, we asked that the guideline provides definitions for the terms "healthy diet", "sugar-sweetened beverages", "non-alcoholic beverages", "subsidy", and that it includes considerations on the effect of taxes on sugar-sweetened beverages on substitution, especially around non-sugar-sweetened beverages.

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[1] [https://ncdalliance.org/sites/default/files/resource\\_files/Joint\\_NCDA\\_response\\_WHO\\_fiscal\\_policies\\_guideline\\_vFINAL.pdf](https://ncdalliance.org/sites/default/files/resource_files/Joint_NCDA_response_WHO_fiscal_policies_guideline_vFINAL.pdf)

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