

NCD Alliance Statement at

Third WHO Forum on alcohol, drugs and addictive behaviours

on

1st Draft of Global alcohol action plan 2022-2030 to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol

June 2021

Thank you for this opportunity to make an intervention on behalf of NCD Alliance.

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 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.

Thank you.