

18 January 2022

**GAPA Key Points for the WHO Executive Board discussion**

**DRAFT ACTION PLAN (2022–2030) TO EFFECTIVELY IMPLEMENT THE GLOBAL STRATEGY TO REDUCE THE HARMFUL USE OF ALCOHOL AS A PUBLIC HEALTH PRIORITY**

The draft WHO Alcohol Action Plan to be discussed at the WHO Executive Board meeting ([EB150](#)) is Appendix 1 to Annex 8 of the report on the NCD agenda item, contained in document [EB150/7 Add.1](#). It is one of 10 different items in the NCD package.

Given its bundling into the NCD suite of documents it is not clear if the text of the action plan will be discussed at the EB150 or not. If it is opened for discussion in the EB or intersessional meetings, we want to ensure the text is not weakened and want to promote:

- Regular reporting to the WHA
- Strengthen support for Member States to manage interference in policy making by the alcohol industry
- Protect recommendations for the best buy alcohol policies and the SAFER measures.
- Protect alcohol per capita consumption as indicator for harmful use of alcohol

**Regular reporting**

The adoption of the Alcohol Action Plan with no requirement for reporting to the WHA until 2030 will not guarantee acceleration of action to reduce the alcohol harm. Accelerating action was the purpose of the WHO Executive Board decision [EB146\(14\)](#).

WHO EB150 should ensure accountability and opportunity for more discussion and for alcohol to be on the WHA agenda before 2030. To this end an important goal is to have regular reporting of the progress countries do or do not make towards implementation of the action plan. Hence GAPA proposes the inclusion in the Action Plan or in a Decision or Resolution a request along the lines of:

*“The Director-General shall report biennially to the World Health Assembly on the status of implementation of the Global Alcohol Action Plan»*

This is in line with Article 62 of the WHO Constitution which requires reporting on recommendations from member states:

Article 62: Each Member shall report annually on the action taken with respect to recommendations made to it by the Organization and with respect to conventions, agreements and regulations.

**Strengthen support for Member States to manage interference in policy making by the alcohol industry**

There is a fundamental and irreconcilable conflict of interest between the commercial and other vested interests of the alcohol industry’s primary objective to sell more of its products and public health interests. Whilst the Alcohol Action Plan acknowledges the role of industry as a major barrier to progress in alcohol policy development and points to “Protection from commercial interest” as

one of the Operational principles, it is undermined by inclusion of measures for industry across every aspect of the action plan.

If the text is opened up for discussion GAPA proposes for inclusion:

*«The Secretariat shall develop specific guidance to Member States on how to protect alcohol policy development, implementation, and evaluation from alcohol industry interference*

The draft action plan conveys conflicting messages in that it points to the harmful marketing practices of the industry while recommending self-regulatory measures, which are known to be ineffective.

If the text is opened for discussion GAPA proposes:

- The proposed “measures” for economic operators should be placed in a single section separate from the action areas.
- Remove reference to “self-regulatory measures on marketing and advertising”

### **Strengthen the role of the “best buys”**

The Best Buy policy options as identified in Annex 3 of the NCD Global Action Plan have strong evidence of effectiveness. Evidence of effectiveness in LMICS has increased. Action area 1 should highlight implementation of the “best buys”, and specifically mention:

- Increase and adjust excise taxes on alcohol products to reduce affordability
- Enact and enforce bans or comprehensive restrictions on exposure to alcohol advertising (across multiple types of media)
- Enact and enforce restrictions on the physical availability of alcohol

### **Other GAPA concerns**

During the drafting process some key points have been promoted by GAPA and on these the following observations can be made:

- **Initiate interagency project on cross-border marketing**  
Cross border marketing of alcohol was a key concern of the EB146 which also asked for a Technical report on that topic (EB146(14)). The full technical report has not yet been published but a [summary](#) is available
- In the draft Alcohol Action Plan, as a minimum, present wording needs to be protected:
  - Action area 1, Action 5 for WHO Secretariat: “Promote and support international collaboration in addressing cross-border alcohol marketing, advertisement and promotion, with a focus on the public health risks associated with new cross-border marketing practices.”
- **Terms of reference for the WHO Expert Committee**  
The wording on the Expert Committee (Action Areas 4, Action 11 for WHO Secretariat) has improved since the 2nd draft and the present wording should be protected.
- **Target 1.2 – 20% reduction in alcohol per capita consumption**  
In the 1<sup>st</sup> draft the target was for 20% reduction in alcohol per capita consumption (APC) by 2030. Since the second draft it has changed to 20% reduction in “harmful use of alcohol”. APC is the strongest measure well accepted in the research community and would be preferable to a composite target which is now in the action plan. GAPA would promote

returning to the target of 20% reduction in APC, but as a minimum the present element of alcohol per capita consumption in the composite indicator needs to be protected.

- **Increase financial and normative support to reduce global inequity in alcohol harm**  
As high-income countries have become alcohol saturated alcohol producers have turned to the markets of countries with growing economies, youthful and urbanising populations, and where the prevalence of drinking commercial alcohol is lower than in high-income countries. These are countries with few of the effective alcohol policies enumerated by the global strategy in place. LMICs have called on WHO for a stronger global response and for support to build capacity at national level.
  
- GAPA requests WHO and Member States to place the need of LMIC for assistance in stemming the tide of alcohol to the forefront of the action plan. Member States need to protect the following two Actions:
  - As a minimum Action Area 6, Action 2 for Member States “Consider, when appropriate in national contexts, the development and implementation of earmarked funding or contributions from alcohol tax revenues [...]” needs to be protected.
  - Action 5 under the same action area: “Participate in and support international collaboration to increase the resources available for accelerating implementation of the global strategy and action plan to reduce the harmful use of alcohol and support provided to low- and middle-income countries in developing and implementing high-impact strategies and interventions.” This Action also needs to be protected and implemented.