

Draft updated Appendix 3 of the WHO Global NCD Action Plan 2013-2030

(WHO Discussion Paper, version dated 1 August 2022)

EuroHealthNet consultation contribution (09/08/2022)

This document reflects EuroHealthNet's contribution towards the WHO second draft on the updated Appendix 3 of the Global Action Plan for the Prevention and Control of Non-Communicable Diseases (NCDs) 2013-2030 – also known as the NCD “Best Buys” and other recommended interventions.

EuroHealthNet is a not-for-profit European partnership of organisations, agencies and statutory bodies working on public health, health promotion, disease prevention, and reducing inequalities. With a long-term commitment to health, equity, and wellbeing EuroHealthNet recognises the importance of comprehensive, timely and accelerated, as appropriate, actions addressing unhealthy and unsustainable lifestyles and environments, in particular in the context of the prevention and control of NCDs and their underlying risk factors. Despite improved prevention, diagnosis and treatment we see a significant decrease in global premature NCD mortality, with the greatest decline in the WHO European region over the past two decades, the pace of change in most countries is too slow for the world and Europe to achieve SDG target 3.4 on the NCD prevention and control. At the current pace of improvement (about 1.9% annually, 23% by 2030), SDG target 3.4 will not be met by 2030 (WHO, 2022 & [EuroHealthNet estimates](#)). We support more accelerated and targeted actions at all levels of government and society.

In particular, EuroHealthNet welcomes the second draft adding a cost-effectiveness analysis to the intervention on **unhealthy food marketing restrictions for children**, and on **sugar-sweetened beverage taxation** ([EuroHealthNet, 2022c](#)). We welcome it that the draft recognises the fact that the absence of a cost-effectiveness analysis does not undermine interventions' cost-effectiveness, neither their affordability and feasibility, pressing for periodic revision as data becomes available. While welcoming the strengths of the document, and bringing in its input towards other either EU or global NCD-related consultations and processes, EuroHealthNet further proposes to consider better **linking the NCDs “Best Buys” to global, regional and national resilience and recovery agenda**, the role of **public legislation and regulation** in this regard, as well as considering to broaden this approach to **include cost-effective interventions in the field of mental health as one of key NCDs**. The 2018 NCD Political Declaration recognised that *“mental disorders and other mental health conditions, as well as neurological disorders, contribute to the global burden of NCDs”* and called for *“integrating them into national responses for NCDs”*. Considering the extent of and exponential growth of poor mental health across all levels of society and in particular linked to most recent health crises and emergencies such as the pandemic, armed conflicts, and climate change, their co-morbidity and social inequality patterns, **there is no reason to exclude mental health recommended interventions from the Global Action Plan for the Prevention and Control of NCDs 2013-2030**.

Last but not least, EuroHealthNet urges the document to **consider listing cost-effective interventions linked to environmental and climate change-related NCDs**, in particular if evidence shows strong relationships with other NCDs risk factors (mental health, CVDs, cancers) and patterns of inequalities. Global, regional and national efforts towards green and sustainable transitions should be maximised to this effect.

EuroHealthNet's proposed amendments to consider:

Objective 1: To raise the priority accorded to the prevention and control of noncommunicable diseases in global, regional and national agendas and internationally agreed development goals, through strengthened international cooperation and advocacy (overarching/enabling actions)

- *"Integrate NCDs into the **public health, social and development agenda and poverty alleviation strategies, including in the pandemic preparedness and response, as well as the recovery and resilience building efforts**"*
- *"Engage **and empower**, mobilize **and enable** civil society, **public authorities** and the private sector as appropriate **and with due attention to the conflict of interest policy at place**, and strengthen international cooperation to support implementation of the action plan at global, regional and national levels"*

Objective 2: To strengthen national capacity, leadership, governance, multisectoral action and partnership to accelerate country response for the prevention and control of noncommunicable diseases (overarching/enabling actions)

- *"Develop and implement a national multisectoral policy and plan for the prevention and control of NCDs through multi-stakeholder engagement, **with due attention to the conflict of interest policy at place**"*
- *(new) "Set context-related time-bound targets as part of a national multisectoral plan for the prevention and control of NCDs"*
- *(new) "Prioritize and strengthen national capacity for the implementation and enforcement of legislative and regulatory interventions for the prevention and control of NCDs"*

Objective 3: To reduce modifiable risk factors for noncommunicable diseases and underlying social determinants through creation of health-promoting environments

Tobacco use:

- T1 *"Increase excise taxes and prices on **all tobacco products, including novel tobacco products such as Smokeless/Heated Tobacco Products (HTPs) and e-cigarettes**" ([EuroHealthNet, 2022a](#); [EuroHealthNet, 2022b](#))*
- T2 *"Implement plain/standardized packaging ~~and/or~~ large graphic health warnings on all tobacco packages, including novel tobacco products"*
- T3 *"Enact and enforce comprehensive bans on **all tobacco and novel tobacco products** advertising, promotion and sponsorship, **including through digital communication channels and those targeted and likely to appeal to children and young people**"*
- T4 *"Eliminate exposure to second-hand tobacco smoke in all indoor workplaces, public places, public transport, **as well as in certain outdoor spaces frequented by children and young people (schools, playgrounds)**" ([EuroHealthNet, 2022a](#))*
- *(new) "Enact and enforce comprehensive bans on all tobacco and novel products flavours"*
- T5 *"Implement effective mass media campaigns that educate the public about the harms of smoking/tobacco use and second-hand smoke, **whilst strengthening health literacy and skills, especially among the vulnerable groups**"*

Harmful use of alcohol:

- A2 *"Enact and enforce bans or comprehensive restrictions on exposure to alcohol advertising, **marketing, promotion and sponsorship** (across multiple types of media), **including those targeted and likely to appeal to children and young people, as well as socio-economically vulnerable groups**"*

- A9 “Restrict or ban promotions of alcoholic beverages in connection with sponsorships and activities targeting young people **and those likely to appeal to socio-economically vulnerable groups**”

Unhealthy diet:

- H2 “**Enact and enforce mandatory** front-of-pack labelling as part of comprehensive nutrition labelling policies” ([EuroHealthNet, 2022d](#))
- H4 “Behaviour change communication and mass media campaign for healthy diets, **whilst strengthening health and food literacy and skills and through tackling the systemic factors that determine consumers’ food choices**”
- H5 “**Enact and enforce mandatory policies, bans and regulatory actions** to protect children from the harmful impact of food marketing”
- H7 “**Reviewing pricing and taxation policy** on sugar-sweetened beverages as part of comprehensive fiscal policies to promote healthy diets”
- (new) “**Reviewing pricing and taxation policy on ultra-processed foods**”
- (new) “**Implement urban planning and urban design, at all levels of government, to support neighbourhoods and communities access to healthy diet-promoting food supply chains**”

Objective 4: To strengthen and orient health systems to address the prevention and control of noncommunicable diseases and the underlying social determinants through people-centered primary health care and universal health coverage

- “Integrate very cost-effective noncommunicable disease interventions into basic primary health care package with referral systems to all levels of care to advance the universal health coverage agenda”
- “Explore viable **health financing mechanisms and innovative economic tools** supported by evidence” ([EuroHealthNet e-Guide for Financing Health Promoting Services, 2020](#))
- “Train the health workforce and strengthen capacity of health system particularly at primary care level to address the prevention and control of noncommunicable diseases, **whilst building capacity of the workforce to work across sectors, addressing health inequalities and commercial determinants of health**”
- “Expand the use of digital technologies to increase health service access and efficacy for NCD prevention, and to reduce the costs in health care delivery, **whilst strengthening health literacy and digital skills, and through tackling the systemic factors that determine people’s health through the use of digital technologies**”
- (new) “**Build capacities to diagnose, communicate and act on underlying determinants of health**” ([EuroHealthNet, 2022e](#))
- (new) “**Invest in good (early) childhood conditions amongst the more and most vulnerable as a critical entry point for health across the life course**” ([EuroHealthNet, 2022e](#); [EuroHealthNet, 2021](#))
- (new) “**Invest in making local communities ‘umbrella settings for health’ and in integrated community care initiatives, which address primary care, social services, social prescribing, physical activity, and age-friendly environments**” ([EuroHealthNet, 2022e](#))