To the President of the United Nations General Assembly, His Excellency Miroslav Lajčák and co-facilitators of the negotiations and consultations on the Political Declaration on the 2018 Third High-Level meeting of the General Assembly on the Prevention and Control of Non-Communicable Diseases, Ambassador and Permanent Representative of Italy, His Excellency Mr. Sebastiano Cardi, and Ambassador and Permanent Representative of Uruguay His Excellency Mr. Elbio Rosselli

Excellencies,

Recalling the Statement of Concern endorsed by 140 organizational members and supporters of the Conflict of Interest Coalition in June-September 2011 at the First High Level Meeting about undisclosed and unregulated conflicts of interest in NCD policy-making and advocacy, and the further call in June-July 2014 by 161 groups and networks representing more than 2,000 groups worldwide for effective safeguards against conflicts of interest in the Political Declaration of the Second High Level Meeting and ensuring the primacy of health in trade agreements, we note with growing concern that:

1. The final Political Declaration must include clear and unambiguous calls for express conflict of interest safeguards, especially concerning the food, alcohol, and pharmaceutical industries. The first and second drafts of the Political Declaration did not mention conflict of interest safeguards (except in relation to the tobacco industry), not even in relation to the notoriously harmful practices of baby feeding industry. Instead, the Zero Draft made 10 references to multi-stakeholder partnerships and voluntary actions by industry and only one general reference to taking regulatory and fiscal measures. Unless the final Political Declaration emphasizes much stricter regulatory measures, United Nations Member States will chiefly promote voluntary measures by industry for the 14 years between the 2011 Declaration and the 2025 review, even as they lament slow improvements or worsening health in the populations they serve.

2. The Political Declaration should be based on input from the most qualified experts and civil society representatives that are free from conflicts of interest. The draft accepts without reservation the report, Time to Deliver, of the World Health Organization’s “Independent High-Level Commission on Noncommunicable Diseases,” at least six members of which have substantial undeclared financial conflicts of interest, mostly involving the pharmaceutical and food industries. The Commission did not report votes on recommendations or policies on recusal, but page 4 of its report acknowledged that minority or even single-member opinions of Commissioners were able to veto recommendations such as whether to hold companies to account or to increase taxes on sugar-sweetened beverages. Likewise, speakers invited to set the stage for discussions at the High-Level Meeting’s July 5, 2018 interactive consultation session included representatives of:

- the NCD Commission (which operates under the above-noted conflicts of interest without safeguards),
- the International Food and Beverage Alliance (an alliance of 10 of the world’s largest food companies),
- the International Federation of Pharmaceutical Manufacturers and Associations (an alliance of the world’s largest drug manufacturers),
- chairman of Choppies Enterprises, supermarket chain, and
- the NCD Alliance (an organization that purports to represent public interest civil society, but was founded with a $1 million grant from the world’s largest medical technology company nearly a decade ago and has continued to receive approximately the same amount of funding annually from pharmaceutical companies, according to the partial set of financial reports on the NCD Alliance’s website).

Sections OP12 and OP18(b) of the Zero Draft display reliance on outdated or inexpert scientific advice; while the text did wisely recommend consuming enough fruits and vegetables, it ignored guidance from the World Health Organization and the Institute for Health Metrics and Evaluation’s Global Burden of Disease project by recommending reductions in “total sugar,” and “total fat”—instead of reducing “free sugars,” and reducing and replacing saturated and trans fats with polyunsaturated fats—and ignoring the need to consume sufficient amounts of whole grains, nuts/seeds, and fibre.

Please ensure that the final text of the Political Declaration emphasizes unequivocal commitments:

1. to robust conflict of interest safeguards at the international, national, and subnational levels of policy-making,
2. to using the best available evidence, and
3. among lawmakers worldwide of the need to use regulations, legislation, and fiscal measures to reduce the burden of noncommunicable disease after seven years of promoting voluntary measures and experiencing disappointing results.

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Respectfully submitted by the undersigned groups and issue experts,

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