

September 2018 Open Letter

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:

- 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.¹ 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.
- 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:

- to robust [conflict of interest safeguards](#) at the international, national, and subnational levels of policy-making,
- to using the [best available evidence](#), and
- 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.

¹ World Health Assembly, *International Code of Marketing of Breast-milk Substitutes*, (Geneva: WHO, 1981), and subsequent relevant WHA resolutions.

Respectfully submitted by the undersigned groups and issue experts,

Signatories and New York City Meeting Interveners



Angela Carriedo, BN, MSc, PhD
London School of Hygiene and Tropical Medicine,
United Kingdom



Bill Jeffery, BA, LLB, Executive Director
Centre for Health Science and Law and
Editor, *Food for Life Report*, Canada



Elisabeth Sterken, BSc, MSc, Dt., Chair, Global Council
International Baby Food Action Network (IBFAN)

Open Letter Signatories



Dr. Patrick Y. KADAMA, Director for Policy & Strategy
African Centre for Global Health & Social Transformation

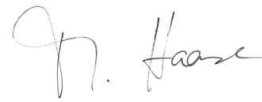


Kim D. Raine, PhD, RD, FCAHS
Alberta Policy Coalition for Chronic Disease Prevention



Lukas Galkus, president
Alcohol Policy Youth Network (APYN), Global

[endorsed by]
Dr Arun Gupta (MD Ped), Convener
Alliance Against Conflict of Interest (AACI), India



Mareike Haase, Advisor International Health Policy
Bread for the World,

[endorsed by]
Dr. J P Dadhich MD (Paediatrics); FNNF; PG-DDN,
National Coordinator and Technical Director,
Breastfeeding Promotion Network of India



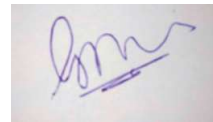
Dipl.-Soz. Jörg Schaaber MPH, Executive Director
BUKO Pharma-Kampagne, Germany



Josh Golin, Executive Director
Campaign for a Commercial-Free Childhood, USA



Gigi Kellett, Deputy Director: Campaigns and Operations
Corporate Accountability



Dr Gopal Dabade, President
Drug Action Forum – Karnataka, India



Ir. W.E. van DALEN Msc, Director
Dutch Institute for Alcohol Policy



Mariann Skar, Secretary General
European Alcohol Policy Alliance



Ennio Palmesino, European Officer
European Mutual-help Network for Alcohol Related Problems

[endorsed by]
Laura Michéle
FIAN International



Diana Bronson, Executive Director / Directrice générale
Food Secure Canada / Réseau pour une alimentation durable



Alessia BIGI, Programme Officer
Geneva Infant Feeding Association (GIFA), Global
(international liaison office of the Int'l Baby Food Action
Network)



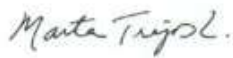
Walter Willett, MD, DrPH, Prof. of Epidemiology and Nutrition
Harvard T.H. Chan School of Public Health, USA



Tim Reed, Executive Director
Health Action International



Martin Drewry, Director
Health Poverty Action



Marta Trejos, LAC, Regional Coordinator
International Baby Food Action Network



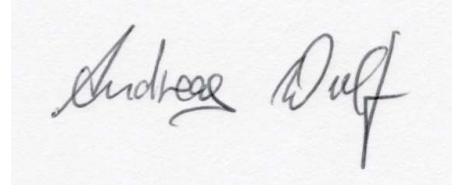
Anne Babb, General Secretary
International Blue Cross, Switzerland, International



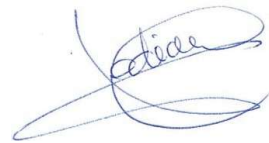
Mark Oremus, PhD, Chair
International Network for Epidemiology and Policy



Nijole Gostautaitė Midttun, President
Lithuanian Tobacco and Alcohol Control Coalition (NTAKK)



Dr. Andreas Wulf, Global Health coordinator
Medico International



Carlos Mediano, MMI President
Medicus Mundi International – Network Health for All

[endorsed by]
Marion Nestle, PhD, MPH, Professor of
Nutrition, Food Studies, and Public Health, Emerita,
New York University, USA



Adriano Cattaneo, Epidemiologist
NoGrazie, Italy

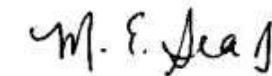


Margo Riebe-Butt, RD, Executive Director
Nourish Nova Scotia



France Gélinas, MPP for Nickel Belt and Health Critic
Ontario New Democratic Party

[signature forthcoming]
Alejandro Calvillo, Presidente
El Poder del Consumidor, Mexico



Meg Sears PhD, Chair
Prevent Cancer Now, Canada

Babatunde Olusegun Adebola AIYELABOLA,
Health and Social Sector Officer
Public Services International (PSI)

Kim D. Raine, PhD, RD, FCAHS, Prof. Assoc. Dean (Research)
School of Public Health
University of Alberta, Canada

Corinne Voyer, Director
Quebec Coalition on Weight-Related Problems, Canada

Norm Campbell, CM, MD, FRCPC,
Libin Cardiovascular Inst. of Alberta
University of Calgary, Canada

Professor David McCoy, B.Med, Dip Anaesth, Dip. Obs,
M.Phil, DrPH, FFPHM
Professor of Global Public Health
Queen Mary University London, United Kingdom

Amandine Garde, PhD, Professor of Law
University of Liverpool, United Kingdom

Doris Grinspun, RN, MSN, PhD, LLD(hon), Dr(hc), O.ONT., CEO
Registered Nurses' Association of Ontario (RNAO), Canada

[endorsed by]
Andrew Pipe, CM, MD, LLD(Hon), DSc(Hon)
Division of Prevention and Rehabilitation
University of Ottawa Heart Institute, Canada

Michelle Pensa Branco MPH IBCLC, Co-Lead
SafelyFed Canada

Brian Cook, PhD, Senior Researcher - Health Behaviours,
Nuffield Department of Primary Care Health Sciences
University of Oxford, United Kingdom

Dr. Stephen J. Watkins,
BSc,MB,ChB,MSc,FFPH,HonFSRH,CMILT
Stockport Health Authority, Public Health, United Kingdom

Margaret Miller, President
World Public Health Nutrition Association

Joel Lexchin MD, Professor Emeritus,
School of Health Policy and Management
York University, Canada

Micheline Beaudry, Ph.D., professeure retraitée de nutrition publique
Université Laval, Canada

Urska Erklavec, President
Youth Network No Excuse Slovenia

Thomas N. Robinson, MD, MPH, Professor of Pediatrics and
Medicine, Stanford University, USA