

# The NCD Alliance

Putting non-communicable diseases  
on the global agenda

## NCD Alliance Written Comments - 17-18 October WHO Informal Consultations on Engagement with Non-State Actors

The NCD Alliance (NCDA) – a global network of civil society organisations working collectively to transform the fight against non-communicable diseases (NCDs) – welcomes the opportunity to provide comments in response to this consultation. Engagement with non-state actors (NSA's) is a critical aspect of WHO's role in global health governance. We welcome this initiative to develop a comprehensive policy that will enhance engagement with non-state actors, improve transparency, due diligence and the management of risks, including conflicts of interest.

The commitment, experience and capacity of civil society organisations is critical to advancing global health. Organisations such as the NCD Alliance and its founding federations (International Diabetes Federation, Union for International Cancer Control, The International Union Against TB and Lung Disease, and World Heart Federation) are key partners to WHO, playing a significant role in advocacy and awareness, providing technical and scientific expertise, ensuring patient engagement and monitoring policies. For this reason the NCD Alliance is supportive of proposals to facilitate more meaningful engagement and participation of NGOs in WHO governing bodies and in consultations.

**Policy guidance on interactions per type of NSA's:** NCDA supports the proposal for an additional, more flexible accreditation system to grant NGOs and other entities without official relations status (such as the NCD Alliance and patient groups) access to WHO governing body meetings. We welcome the calls for disposing of the 24 hour rule for NGO statements and enhancing speaking rights in meetings. When widening the parameters of engagement in consultative processes, WHO should specifically consider the legitimacy of the NGO to contribute to a specific policy or strategy in public health. In addition, we recommend the following measures to further enhance NSA engagement with WHO through consultative processes:

- **Organisation of consultation timelines:** Ensure civil society consultations precede those with Member States. WHO Member States have stressed this is an effective model for understanding and listening to the views of NGOs in policy development, for example the WHO consultation on the Global Monitoring Framework for NCDs in 2012;
- **Clear and well organised timelines for consultations:** NGOs use significant financial and human resources to participate in WHO consultations. Therefore adequate preparation and planning time is essential;
- **NGO participation in Formal Member State Consultations:** Increased use of public hearings and open Member State consultations that include NGOs as observers to ensure transparency;
- **Availability of WHO documents:** WHO Discussion Papers and documents for consultations should be made available well in advance of deadlines, to ensure NGOs have sufficient time to prepare and fully participate in meetings;
- **Online publication of submissions:** Following the example of the European Union (EU), submissions to WHO consultations should be posted online and made accessible to both State and NSA's.

**Policy guidance on degree of due diligence, risk management, transparency:** NCDA is supportive of expanding due diligence to interaction with all NSA's, based on clearly defined and transparent criteria. Intensity of due diligence needs to be adjusted depending on type of engagement and kind of entity. We strongly welcome the Secretariat's proposal for a comprehensive risk management approach requiring an explicit definition of risks of engagement, coherent application across the organisation and standard operating procedures including a clearly defined decision-making process. NCDA also emphasises the need for an online transparency register to be mandatory for all NSAs engaging with WHO<sup>1</sup>, and for it to be subject to regular and systematic review.

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<sup>1</sup> Drawing on lessons learnt from the joint European Transparency Register currently under review we recommend a mandatory system to ensure transparency applies to all Non-State Actors.

There should be consideration for clearer guidance for WHO engagement with NSA's at regional and national level as well.

On a procedural note, we wish to reiterate the call made by participants that the WHO Secretariat will make available a list of all requests made during the meeting, including a clarification of Special Envoy Professor Zeltner's ongoing engagement and opportunities for further review and consultations on the three policy papers to be developed for consideration by the 134<sup>th</sup> WHO Executive Board and the 67<sup>th</sup> World Health Assembly.

Finally, we wish to emphasise that the revised policy for WHO's engagement with non-state actors is critical for the development of a Global Coordination Mechanism for NCDs. NCDs are a multisectoral issue and WHO urgently needs to put the appropriate tools and policies in place to effectively engage a broad range of stakeholders. Partnerships with stakeholders from both the public and private sectors will be critical, in order to translate political commitments into real meaningful and sustained action on NCDs.

The NCD Alliance stands ready to support WHO to further develop its policy on engagement with NSA's to ensure that a broad range of stakeholders have a role to play in forging long-term solutions for the global NCD epidemic.

**The NCD Alliance was founded by:**

