



Web-based consultation on first draft WHO Discussion Paper (dated 8 June 2022): Updating Appendix 3 of the WHO global action plan for the prevention and control of noncommunicable diseases 2013-2030

Introduction

The International Alliance for Responsible Drinking (IARD) welcomes the opportunity to comment on the first draft WHO discussion paper containing a proposed updated Appendix 3.

Making real progress to reduce the global burden of noncommunicable diseases (NCDs), achieving the Sustainable Development Goals (SDGs), and the voluntary global NCD targets for 2025, can only be achieved with a whole-of-society response.

WHO has reported significant global progress in reducing the harmful use of alcohol, as measured by alcohol-related morbidity and mortality, heavy episodic drinking and underage drinking.¹ Nonetheless, progress has been uneven, and there is still much more work that needs to be done worldwide to help combat alcohol-related harm. IARD's members recognize this and are committed to harnessing their resources and expertise to reduce harms and help meet international targets.

We support taking steps to reverse negative, and build upon positive, trends in reducing alcohol-related harm. As leading producers of beer, wine, and spirits, our members take very seriously their responsibility and the role they have been asked to play in reducing harm, as outlined in the [Global Strategy to reduce the harmful use of alcohol \(Global Strategy\)](#), reinforced in the [2018 Political Declaration](#) of the third high-level meeting of the General Assembly of the United Nations on the prevention and control of non-communicable diseases, and reaffirmed in the [Action Plan \(2022-2030\) to effectively implement the Global strategy to reduce the harmful use of alcohol as a public health priority](#) (GAAP). Our members remain fully committed to reducing harmful drinking and playing their role, as part of a whole-of-society approach, including through effective self-regulation and co-regulation, especially where this allows them to go further and faster, to match the rapid pace of change in technology and consumer preferences.

Given the role economic operators have been asked to play, we will continue to constructively engage in reviews, consultations, and dialogues on matters related to the harmful use of alcohol.

Evidence Based Review

IARD welcomes regular, impartial, comprehensive, and evidence-based reviews of alcohol related policy interventions aimed at reducing the global NCD burden. IARD recognizes the value of assessing not only the impact of health policy approaches, but also their cost-effectiveness, so that governments and the communities that they serve can make informed decisions that best suit their national, religious, and cultural context. No singular intervention will meet the needs of every Member State (MS), or work under all circumstances given vastly diverse populations with different types of harmful drinking patterns. Therefore, there is a strong need for comprehensive reviews of all available policy options that are recognized within the Global Strategy.

¹ [WHO Global status report on alcohol and health, 2018](#)

Innovative interventions to reduce the harmful use of alcohol, particularly those led by or co-created with the private sector, provide a pathway for fruitful public-private partnerships and should be pursued. Such partnerships can enable the interventions to be guided by public health principles and evaluated independently by scientists. This would be consistent with a whole-of society approach and would expand the basket of tools available to policy makers.

IARD also values strong scientific rigor in policy research and evaluation, alongside the provision of clear, transparent, and robust methodological approaches. IARD holds itself to this standard when undertaking its own policy reviews, ensuring that:

1. Clear criteria for inclusion/exclusion are articulated
2. Definitions are provided
3. Standard hierarchies of evidence are applied, and
4. Critical, robust analysis completed through a transparent and peer-reviewed approach.

We believe that the same rigor should be applied to the revision of Appendix 3 to ensure that the deemed effectiveness of the policy options included is supported by a robust and transparent evidence base.

Open Consultation

IARD welcomes WHO undertaking an open consultation, however, we are concerned that many stakeholders may be unaware that a review of Appendix 3 has begun.

Scheduling the web-based consultations during the summer risks limiting the range of organizations able to contribute. Consulting with the widest possible range of stakeholders is not only consistent with a whole-of-society approach but will broaden the evidence base that MS can draw upon when considering the review of Appendix 3, ultimately contributing to more robust policy decisions. All perspectives should be sought and considered before policymakers decide on a path forward, as recommended by OECD² and as part of the principles of Better Regulation, which are applied in a significant number of MS³. No one sector or stakeholder group can solve these global challenges alone. Success is only achievable through trust built on open and comprehensive consultation.

IARD Member Actions

IARD members are playing an active role in whole-of-society efforts to reduce harmful drinking, including by supporting the delivery of alcohol-related policy options in Appendix 3.

For example, in response to the 2018 Political Declaration of the third high-level meeting of the General Assembly of the United Nations on the prevention and control of non-communicable diseases, which invited the private sector to take concrete steps, where relevant, towards eliminating the marketing, advertising and sale of alcohol products to minors, IARD members have set [global standards for online alcohol sales and delivery](#), and continue to support server training, ID checks, and retailer activities such as avoiding irresponsible promotions.

In addition, IARD members:

- Established [Global Standards for Influencer Marketing](#)
- Launched a [partnership with digital platforms to deliver responsible marketing standards](#)
- Have a long history of supporting efforts to combat drink driving both [collectively](#) and individually
- Support the establishment of blood alcohol concentration limits, the enforcement of drink-driving laws, and programs to reduce drink driving

² OECD, Strategy and policies for Better Regulation. Available at: <https://www.oecd.org/gov/regulatory-policy/44912041.pdf>

³ European Commission, Better Regulation: why and how. Available at: https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en

- Have supported access to Screening and Brief Intervention (SBI) globally through digital and in-person mechanisms and continue to explore new ways to help consumers assess their drinking habits.

We believe that an enabling regulatory framework that promotes the full portfolio of policy options included in the Global Strategy, alongside those policies included in Appendix 3, provides the best basis for building on the positive trends in alcohol related harm.

IARD looks forward to continuing to participate in the review process of Appendix 3 and to working with a wider group of partners to achieve our shared goal of reducing the harmful use of alcohol.

About IARD

The International Alliance for Responsible Drinking ([IARD](#)) is a not-for-profit organization dedicated to addressing harmful drinking worldwide. IARD is supported by its member companies from all sectors of the regulated alcohol industry – beer, wine, and spirits – in their common purpose of being part of the solution to reducing the harmful use of alcohol. To achieve this, we work with public sector, civil society, and private stakeholders.

IARD actively supports international goals to reduce harmful drinking, including the targets in the United Nations' Sustainable Development Goal (SDG) 3.5 and the World Health Organization's (WHO) Noncommunicable Diseases (NCD) Global Monitoring Framework of reducing the harmful use of alcohol by at least 10% by 2025, and to surpass this by 2030 as aspired to in the in the Action Plan (2022-2030) to effectively implement the global strategy to reduce the harmful use of alcohol as a public health priority]. Our member companies also work towards a broad range of SDGs and are determined to promote sustainable development for all.