

REVISION OF APPENDIX 3 OF THE WHO GLOBAL ACTION PLAN ON NCDs

Comments from the Brazilian government on the revised version of the draft WHO discussion paper

The Brazilian Ministry of Health agrees with the modifications proposed in the revised version of the draft WHO discussion paper. The cost-effective guidelines in the Global Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2030 are very much in line with those proposed in the Strategic Action Plan for Coping with Chronic Diseases and Non-Communicable Diseases in Brazil 2021-2030.

In the aforementioned plan, guidelines are established by risk factors and areas of action. The convergences identified with the proposals in Appendix 3 are contained in a document prepared by the Ministry of Health (please find attached herewith a copy). It should be mentioned that the draft WHO discussion paper recognizes the multi-determination of chronic non-communicable diseases (NCDs) and the importance of actions aimed at their risk factors, including poor diet, as well as the multiple burden of malnutrition, care and tackling NCDs, which require comprehensive and intersectoral actions.

Considering the National Policy on Food and Nutrition, the National Guidelines on Adequate and Healthy food and the Strategic Action Plan to Combat Chronic Diseases and Non-Communicable Diseases in Brazil 2021-2030, as well as the social and environmental determinants for the promotion, prevention and control of NCDs, Brazil believes that the document needs to reflect the importance of carrying out early diagnosis for timely interventions, acting in a multidisciplinary team at different points of the healthcare network, integration of health promotion and healthcare actions, the training and permanent education of professionals and the adequacy of infrastructure, equipment and work processes. Furthermore, the importance of continuous monitoring of the food and nutrition situation of populations and their determining factors for the analysis, formulation and improvement of policies and actions to improve the health conditions of populations according to the local context should be highlighted.

Regarding specific interventions to promote adequate and healthy food, it is worth mentioning the recognition that food consumption goes beyond individual choices and needs a broad approach, from its production to distribution to its consumption, including the improvement of food environments, which enable healthy choices, a fundamental factor for health and nutrition actions aimed at fighting all forms of malnutrition and NCDs. Therefore, Brazil suggests the inclusion, within the scope of comprehensive actions ("Overarching/enabling actions"), of the implementation of national food guides that consider different aspects of adequate and healthy eating, including discussions on food systems, production conditions, circumstances involving the act of eating, appreciation of traditional food and the multiple determinants of food and malnutrition. Food guides are instruments that induce healthy eating practices and public policies in the areas of food and nutrition, health, education and agriculture, among others, acting in the prevention, promotion and recovery of health and nutrition (including NCDs).

Considering the national policies regarding the fight against poor nutrition for the prevention and control of NCDs, it should be mentioned that the Strategic Action Plan for Coping with Chronic Diseases and Non-Communicable Diseases in Brazil 2021-2030 presents a group of indicators and goals for risk factors for NCDs, including: reducing the prevalence of obesity in children and adolescents by 2%, tackling the growth of obesity in adults, increasing the recommended consumption of fruits and vegetables by 30%, reducing consumption of ultra-processed foods and reduce the regular consumption of sweetened beverages by 30%. The aforementioned plan also presents strategic actions aimed at adequate and nutritious food, including, amongst other actions:

- encouraging the development of healthy environments at work, at school, in the community and in the healthcare facilities of the Unified Health System (SUS)
- strengthening actions to support breastfeeding and adequate complementary feeding,
- strengthening comprehensive healthcare considering individuals with obesity as well as strategies for the prevention and treatment of obesity,
- regular monitoring of food and nutrition indicators of the population through food and nutrition surveillance actions in health services,
- and population surveys and communication strategies to promote nutritious and healthy food.

WHO. Update of Appendix 3 to the Global Plan of Action on Noncommunicable Diseases. Request for Comments. Brazil.

WHO Global Action Plan for the prevention and control of Non-Communicable Diseases 2013-2030	Brazil's Strategic Action Plan for Coping with Chronic Diseases and Non-Communicable Diseases 2021-2030.
TOBACCO	
Enact and enforce comprehensive bans on tobacco advertising, promotion and sponsorship	Support and launch campaigns for a total ban on cigarette advertising, including: display for sale, ban on selling to minors, international advertising and modern media, the adoption of standardized packaging and the marketing, import and advertising of electronic smoking devices, including heated tobacco (HTPs). Develop studies to support the implementation of the ban on aroma and flavor additives in smoking products, whether or not derived from tobacco.
Implement effective mass media campaigns that educate the public about the harm of smoking/tobacco use and secondhand smoke	Support and coordinate actions, within the scope of the National Tobacco Control Program, which include communication strategies, production of materials, face-to-face or distance training with an emphasis on risk and protection factors aimed at populations in situations of inequity in health and in remote areas.
Eliminate exposure to second-hand tobacco smoke in all indoor workplaces, public places, public transport	Encourage the development of healthy environments at work, at school, in the community and in the facilities of the Unified Health System (SUS) by encouraging the implementation of "environments free of smoke products, derived or not from tobacco".
Provision of cost-covered effective population-wide support (including brief advice, national toll-free quit line services and mCessation) for tobacco cessation to all tobacco users.	Provide funding for the establishment of cost-covered effective, population-wide support national smoking cessation services, including brief advice and national toll-free quit line services. Develop strategies with the State, Federal District and Municipal Health Departments for the inclusion and expansion of procedures and actions for the prevention and cessation of the use of tobacco-derived or non-tobacco-derived products in the respective portfolios of Primary Health Care services and other levels of attention.

	<p>Carry out integrated actions with pharmaceutical assistance in the care of smokers, with a view to guaranteeing and expanding access to the smoking cessation program, strategic supplies and medicines.</p> <p>Expand access, through the strengthening of Lines of Care, to comprehensive care at all levels of care for people who use tobacco.</p> <p>Make materials and strategies available to strengthen tobacco control in the actions developed by PHC professionals, other levels of care and surveillance in the territory, in partnership with kindergarten, elementary and high schools, especially in schools with a majority of students benefiting from federal government cash transfer programs and vulnerable groups.</p>
Establish a tracking and tracing system to support the elimination of illicit trade in tobacco products	<p>Induce and articulate the implementation of regulatory measures related to marketing, advertising, consumption and inspection against the sale of illegal products.</p> <p>Monitor –on a yearly basis- the incidence of smokers in the adult population, including data on consumption of new smoking products, whether or not derived from tobacco, and illegal products</p>
Ban cross-border tobacco advertising, promotion and sponsorship, including through modern means of communication	
ALCOHOL	
<p>Enact and enforce bans or comprehensive restrictions on exposure to alcohol advertising (across multiple types of media).</p> <p>Restrict or ban promotions of alcoholic beverages in connection with sponsorships and activities targeting young people.</p>	<p>Coordinate and promote technical-scientific and political inputs for regulatory initiatives that aim to apply comprehensive bans or restrictions on advertising, sponsorship and commercial promotion of alcoholic beverages.</p> <p>Support bills aimed at amending Law No. 9.294/1996 to prohibit commercial advertising of alcoholic beverages in the media.</p> <p>Articulate with the Ministry of Justice and Public Security a proposal for a law to regulate the availability and consumption of alcohol at public or private mass events.</p>

Enact and enforce restrictions on the physical availability of retailed alcohol (via reduced hours of sale)	Develop studies to recommend the restrictions on the physical availability and hours of sale of retailed alcoholic beverages.
Enact and enforce drink-driving laws and blood alcohol concentration limits via sobriety checkpoints	Develop national media campaigns on alcohol use and driving, alcohol use and work and employment, alcohol use and domestic violence, and alcohol use and chronic diseases, and measures to protect and publicize available health services to support prevention and cessation of consumption.
Provide brief psychosocial intervention for persons with hazardous and harmful alcohol use	Strengthen the articulation between healthcare networks and social protection networks, promoting actions aimed at people and their families who suffer the impacts of abusive use of alcohol, especially in low-income populations
Provide prevention, treatment and care for alcohol use disorders and comorbid conditions in health and social services	<p>Strengthen the mental health network with the involvement of organized civil society and the implementation of prevention, early detection, treatment and care services for alcohol consumption disorders (fully attributable causes) with a protocol for brief measures, in addition to support and treatment for family members affected in PHC.</p> <p>Coordinate actions to induce psychosocial care policy focused on brief approaches in Primary Health Care, with emphasis on the most frequent mental disorders, acute events, alcohol dependence and abuse, and appropriate management of chronicity.</p> <p>Strengthen the family approach in PHC, developing lines of care and prevention actions that address risks and consequences arising from abusive alcohol consumption.</p> <p>Qualify the availability of information on the Notifiable Diseases Information System (SINAN) on equity and income issues in relation to harm resulting from alcohol consumption.</p>
UNHEALTHY DIET	

Reformulation of policies for healthier food and beverage products	Promotion of healthy and adequate food actions according to the Food Guide for the Brazilian Population. Implement guidelines to promote healthy eating, according to health conditions and life cycles.
Front-of-pack labelling as part of comprehensive nutrition labelling policies	Develop strategies aimed at reducing the consumption of added salt and sugar, through food reformulation, adequate labelling and communication campaigns. Strengthen measures to improve regulations regarding the adequate nutritional labelling of foods, based on scientific evidence.
Public food procurement and service policies for healthy diets	Articulating strategies to expand the production, supply and access of <i>in natura</i> and minimally processed foods produced in a healthy and sustainable way
Behaviour change through communication and mass media campaign for healthy diets	Develop campaigns aimed at reducing the consumption of added salt and sugar.
Policies to protect children from the harmful impact of food marketing	Strengthen regulations on food advertising/marketing, mainly aimed at children.
Protection, promotion and support of optimal breastfeeding practices	Strengthen actions to support breastfeeding and adequate complementary feeding, supported by the National Food and Nutrition Policy, National Policy for Comprehensive Care for Children's Health, according to the recommendations of the Food Guide for Brazilian Children under 2 years old. Encourage and support state and municipal initiatives for exclusive breastfeeding up to 6 months.
Taxation on sugar-sweetened beverages as part of comprehensive fiscal policies to promote healthy diets	Promote technical-scientific and political inputs to support the development of regulatory and fiscal measures to reduce the consumption of ultra-processed foods and encourage the consumption of <i>in natura</i> and minimally processed foods.

Subsidies on healthy foods and beverages (e.g. fruits and vegetables) as part of comprehensive fiscal policies for healthy diets	<p>Encourage the purchase of healthy food from family farming, according to the National School Feeding Program.</p> <p>Stimulate the production of organic and agro ecological food in urban and rural environments.</p>
Menu labelling in food service to promote healthy diets (e.g. reduce total energy intake (kcal) and/or intake of sugars, sodium and unhealthy fats)	<p>Develop strategies aimed at reducing the consumption of added salt and sugar, through food reformulation, adequate labelling and communication campaigns.</p> <p>Strengthen measures to improve regulations regarding the adequate nutritional labelling of foods, based on scientific evidence.</p>
Limiting portion and package size to reduce energy intake and the risk of overweight/obesity	<p>Develop strategies aimed at reducing the consumption of added salt and sugar, through food reformulation, adequate labelling and communication campaigns.</p>
Nutrition education and counselling in different settings (for example, in preschools, schools, workplaces and hospitals) to promote healthy diets	<p>Encourage and offer technical support for the regulation of school cafeterias aimed at adequate and nutritious food for students.</p>
PHYSICAL INACTIVITY	
Provide physical activity assessment, counselling, and behaviour change support as part of routine primary health care services through the use of a brief intervention	<p>Develop and offer continuing education initiatives to equip PHC professionals to advise users on physical activity and health benefits.</p> <p>Carry out permanent education initiatives for PHC professionals to build skills in the development of adapted physical activities as components of care for the elderly, people with disabilities and mental disorders.</p> <p>Support public managers, the market and the third sector in decision-making, design and implementation of initiatives to promote physical activity and bodily practices in the population.</p>

Implement sustained, population wide, best practice communication campaigns to promote physical activity, with links to community-based programmes and environmental improvements to enable and support behaviour change.	Carry out national campaigns to promote physical activity and reduction of sedentary behavior, healthy environments and the relationship with climate change.
Implement urban and transport planning and urban design, at all levels of government, to provide compact neighbourhoods providing mixed-land use and connected networks for walking and cycling and equitable access to safe, quality public open spaces that enable and promote physical activity and active mobility	Subsidize relevant sectors with information on the importance and gains for the health of the population with the construction and definition/delimitation of leisure spaces such as squares, parks (urban green areas) and open areas with structure for physical activity with access to drinking water .
Implement whole-of-school programmes that include quality physical education, and adequate facilities, equipment and programs supporting active travel to/from school and support physical activity for all children of all abilities during and after school	Articulate with the Brazilian Ministry of Education (MEC) the enforcement of physical education classes in the basic education of the public school system, the expansion of the number of schools with structures and equipment for the practice of sports, the strengthening of local, regional and national school sports competitions and the practice of full-time school sports.
Improve walking and cycling infrastructure ensuring universal and equitable access to enable and promote safe walking, cycling, other forms of micro mobility (e.g. wheelchairs, scooters and skates) by people of all ages and abilities	Promote coordination to increase the mileage of cycle paths and cycle lanes in capitals and large Brazilian cities.
Implement multi-component workplace physical activity programmes	Stimulate the development of healthy environments at work, at school, in the community and in health services within the scope of the SUS through the provision of services aimed at the practice of physical activity and leisure.

The Strategic Action Plan for Coping with Chronic Diseases and Non-Communicable Diseases in Brazil 2021-2030 (DANT Plan) also included guidelines regarding mental health and air pollution, as recommended in the WHO 5X5 agenda.

Regarding the four main groups of NCDs (cancer, diabetes, cardiovascular diseases and chronic respiratory diseases), convergences can also be verified between the initiatives in Appendix 3 and those proposed in the DANT Plan, especially in regards to:

- Conducting information campaigns on risk and protective factors for these diseases,
- Strengthening of therapeutic projects,
- Expanding the coverage of services,
- Improving diagnosis,
- Support for intersectoral measures to promote healthy behaviors for the prevention and control of these diseases,