

SWE comments on the updated Appendix 3 of the WHO Global NCD Action Plan

Sweden wishes to address following aspects regarding the appendix 3:

It is important that governments can demonstrate the benefits of prevention. Including economic benefit.

Sweden is missing the perspective of healthy food environments, especially in the tax financed sector.

Another aspect to possibly cover in the next round is the challenge of WHO country offices not having the robust foundation necessary to support countries in health economic calculations (including the usage of WHO CHOICE). The resources of personnel with adequate competences in health economy and NCD prevention are limited in for instance the AFRO-region.

Finally, Sweden also wishes to address the aspects of data analysis, the cost effectiveness of interventions and the contextual aspect.

As cost efficiency is many times specific for different countries and contexts it is potentially problematic to address interventions as "very cost-effective and affordable for all member-states". The results are intertwined with the general national public health and the effect of intervention on risk behaviour and prevalence.

The interventions which are stated to be cost effective are not referring to a threshold value and differs between countries. If possible, further dividing of countries and interventions beyond the current categories of low, low-middle and high could be beneficial. Each intervention needs a demonstrated and quantifiable effect from at least one study in a peer-reviewed journal. However, preferably studies applicable on different categories of countries should be used.