

Letter from the World Public Health Nutrition Association (WPHNA), FIAN International and International Baby Food Action Network (IBFAN)
RE: Political Declaration on the Prevention and Control of NCDs and Promotion of Mental Health (rev.4)

Friday, 19th of September 2025

To: United Nations Member States and the drafters of the Political Declaration
CC : World Health Organization (WHO), United Nations Inter-Agency Task Force on the Prevention and Control of NCDs and HLP of Food Security

With this letter, the **World Public Health Nutrition Association (WPHNA)**, the **International Baby Food Action Network (IBFAN)** and **FIAN International** would like to express our concerns about the Political Declaration on Noncommunicable Diseases (NCDs) and Mental Health (rev.4), which appears to be the most recent and final version of the declaration, which reached UN-ECOSOC accredited civil society organizations only as a leaked draft. We commend the global commitment to accelerate action on these critical issues. However, we would like to raise three central concerns that we believe must be addressed to ensure a robust, transparent, and effective political declaration:

1. Omission of Commercial Determinants of Health in Framing Causes and Prevention of NCDs

We are deeply concerned by the limited attention given to the **commercial determinants of health** in the declaration. While paragraphs 13, 21, 35, 36, and 44 mention rising rates of obesity, there is not a meaningful discussion of the structural causes—particularly those associated with **ultra-processed foods** , **alcohol** , and **health-harming commercial practices** .

The document fails to integrate a food systems perspective and lacks a clear commitment to **regulate** the industries whose products, marketing strategies, and political interference directly undermine NCD prevention efforts. Scientific evidence clearly identifies **ultra-processed food and alcohol as significant contributors to poor dietary patterns, obesity, cancer, cardiovascular disease, and liver conditions**. The failure to fully integrate these risk factors into the core causal narrative and preventive measures significantly weakens the declaration and misses a key opportunity to address the structural causes of NCDs within the food system.

2. Absence of Explicit Mechanisms to Prevent Conflict of Interest and Industry Interference

The draft insufficiently addresses the **conflicts of interest** (para. 80) that may arise from engagement with the private sector, including industries whose interests are not aligned with public health. The document repeatedly calls for multistakeholder collaboration and multisector



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partnerships with the private sector (eg, paras. 27, 64, 76), without acknowledging the risks that stem from such engagements, nor establishing clear **guidelines, safeguards, and transparency measures** to avoid undue influence and interference from health-harming industries in global and national efforts to combat NCDs.

This is particularly troubling given the well-documented tactics employed by sectors such as **big food, alcohol, and tobacco** to delay, dilute, or derail public health policies. Without robust governance and accountability mechanisms, such engagement risks undermining public trust and the integrity of the actions to mitigate and prevent NCDs.

3. Lack of Transparency and Clarity on the Implementation and Follow-Up Process

The declaration lacks precise **mechanisms** to ensure **transparency, participation, and accountability in the implementation and follow-up process**, including in the setting of priorities, the implementation of actions, and the monitoring of outcomes.

While it calls for strengthened data and public health surveillance, data use and data protection are mentioned (73,74) it neither specifies how civil society will be engaged in the accountability process, nor how potential influence from vested interests will be mitigated nor how the right of privacy and data protection will be executed.

Only for. 27 mentions the civil society with no foreseen role in the **follow-up mechanisms described in paras. 76-81**. These actions remain vague, and there is **no mention of how civil society and people affected by NCDs and mental health conditions (rights holders) will be engaged in the process**.

For the commitments made in the declaration to have any meaningful impact, the follow-up process must explicitly include **independent oversight**, **meaningful participation of public-interest civil society and rights-holders**, and **public reporting** requirements to ensure progress is not only tracked but also meaningfully scrutinized, and States can be held accountable for their commitments.

We urge the drafters and Member States to:

- Incorporate a food systems perspective and strengthen references to **obesity** and the **commercial determinants of health**, including ultra-processed food and beverages and alcohol, throughout the document.
- Includes **clear, enforceable measures to prevent conflicts of interest** and protect against undue influence and interference by industry in food, nutrition, health, and other NCD-relevant policymaking, both at the national and UN levels.



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- Ensure **greater transparency, public accountability, and meaningful public-interest civil society and rights-holders participation** in the implementation and follow-up of the declaration.

The credibility and impact of this Political Declaration depend on its ability to confront the root causes of NCDs, free from the constraints of commercial influence, and to operate in a transparent and accountable manner. **We stand ready to support and collaborate in strengthening the current text and the process to promote the health and well-being of all.**

Respectfully,

Margaret Miller

President, World Public Health Nutrition Association
president@wphna.org

Ana María Suárez Franco

General Secretary, FIAN International
Suarez-franco@fian.org

Patti Rundall

Global Advocacy, International Baby Food Action Network
prundall@babymilkaction.org

Supported by:

Souad Mahmoud

Coordinator, Coordination Féministe pour la Souveraineté Alimentaire

Javier Guzmán

Director, Justicia Alimentaria

Paula Johns

Executive Director, ACT Promoção da Saúde

Juan Manuel Saldaña

Project Coordinator, Liga de Consumidores Con Tal Cual

Simon Barquera

President, World Obesity Federation

Regina Murphy Keith

Course Leader, Global Public Health Nutrition, Westminster University



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Sarah Hawkes & Kent Buse

Co-Founders and CEOs, Global 50/50

Chris van Tulleken

Professor of Global Health and Infection, UCL

Nick Nisbett

Food Equity Centre, Institute of Development Studies

Stuart Gillespie

Author 'Food Fight'

Joe Yates

Co-leader of Agriculture, Nutrition & Health (ANH) Academy, LSHTM



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