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100 YEARS OF  
ADVANCING  
PHARMACY  
WORLDWIDE



World Confederation  
for Physical Therapy



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**RE: Comments on the draft version of Targets to Monitor Progress in Reducing the Burden of Non-Communicable Diseases**

Dear Dr. Alwan,

Thank you very much for sharing the draft version of the Targets to Monitor Progress in Reducing the Burden of Non-Communicable Diseases (NCDs) for comments.

We, the five main global health professional organisations, in official relations with WHO, welcome the attention that is now being given to NCDs and the recognition that they are major contributors to the global burden of disease. The work of the WHO and the United Nations in this field is warmly welcomed. It gives hope that member states will pay more attention to preventing, treating and rehabilitating NCDs.

However, we have some concerns about the presented draft targets document, particularly its narrow focus on four disease groups, among the wide field of NCDs

With the focus only on cardiovascular disease, cancer, diabetes and chronic respiratory disease we fear there is a risk that governments will concentrate only on improving in these areas, detracting from other major NCD threats, such as musculoskeletal diseases, accidents, mental or oral diseases. The effect of this vertical or silo approach – an approach that has been criticised by WHO before in other contexts, particularly communicable disease – will be to deprive other important areas of health care of necessary resources. The approach as outlined will not lead to a comprehensive solution for health care.

The draft targets document also takes no account of the strong effect of social determinants of health on NCDs. When presenting the WHO 2008 report “Closing the gap in a generation: Health equity through action on the social determinants of health.” Dr Margaret Chan noted: “The social conditions in which people are born, live, and work are the single most important determinant of good health or ill health, of a long and productive life, or a short and miserable one.”

The United Nations Summit in September is the place to address this. Targets could address the elimination of inequalities in health care.

The document lacks an emphasis on access to effective health care as a human right. Defining health success as a mere statistical challenge deprives individuals of the health care they should be entitled to. We are concerned that the targets reduce health care to very limited technical provisions, forgetting the all too important person-centred care and people-centred public health care approaches.

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By focusing on just four disease groups, WHO’s own strategy on health care system strengthening is undermined. Health care systems based on a core of solid primary care cannot be reduced to serving particular interests. The world needs a holistic approach to health care, addressing the social determinants of health and ensuring access to effective health care as a human right.

Some comments in detail:

Tobacco smoking: A reduction of 40% is not an ambitious target. Furthermore, minors under 18 years of age should not smoke at all. The existing WHO Framework Convention on Tobacco Control seems more ambitious than this new document. Children should be actively prevented from any exposure to tobacco smoke wherever they are. Provision (not only sales) of cigarettes to minors should be punishable. Legislation enacted and effectively enforced could be a useful target.

Alcohol: Again a 10% reduction is not an ambitious target. Furthermore, under-age drinking should be completely banned. When being sold at public events, the cheapest alcoholic beverage must be more expensive than the most expensive non-alcoholic beverage. The implementation of such measures can easily be accomplished by the member states. They would be reasonable targets.

The World Health Professions Alliance WHPA advocates that discussion on NCDs should:

- adopt a holistic approach based on common risk factors. This approach, incidentally, would be equally applicable to communicable diseases.
- not restrict the scope of the outcomes document to a limited number of diseases, but include other areas, notably mental health and oral health.
- focus on equitable access to health care as a human right so as to address the dramatic disparities within and between countries.
- pay due attention to the link between non-communicable diseases and the social determinants of health, with a particular focus on the broader factors that influence behaviour and associated health risks. These include the conditions in which people are born, grow, live, work and age, as well as societal influences.
- strengthen health care systems through a comprehensive approach that places emphasis on primary health care and integrates prevention, specialised treatment and rehabilitation, supported by the enhancement of collaborative practice between healthcare professionals (integrated care).

With kind regards

David Benton, Chief Executive Officer, International Council of Nurses	Ton Hoek, General Secretary, International Pharmaceutical Federation	Brenda Myers Secretary General, World Confederation for Physical Therapy	Jean Luc Eiselé, Executive Director, World Dental Federation	Otmar Kloiber, Secretary General, World Medical Association
				