

International Baby Food Action Network (IBFAN)

142th session of the Executive Board



Agenda Item EB 3.1 Draft thirteenth general programme of work 2019-2023 (EB142/3, EB142/3 Add.1/ and EB142/3 Add.2)

As one of WHO's longest-standing public interest partners, IBFAN places great value on WHO's Core constitutional norm-setting functions and its independence, integrity and trustworthiness.

We appreciate the opportunity to comment on the latest draft of the GWP. While some of the concerns we and others raised in the consultation have been partially addressed, omissions remain, for example the importance of sound nutrition and especially laws to protect breastfeeding. However, most importantly, the plan fails to fully identify the risks of engagement and partnership with the private sector and the threat this poses to WHO's lead role in proposing and building the international Rule of Law.

In relation to undue influence, the GPW relies on the protection afforded by FENSA. Yet FENSA, like the SUN Initiative, uses a faulty concept of Conflict of Interest that needs to be corrected. It confuses conflicts of interest **within** an institution or person with conflicts **between** actors who have diverging or fiduciary duties. WHO's internal conflict between its mandate and prime functions and its secondary interest to be adequately funded should not be ignored. Paragraph 129 recognises that the 'quality of funds' is more important than their 'quantity' and calls Member states to un-earmark their funding and increase assessed contributions. However the GPW call for private sector funding is clear.

The notion that funding and engagement with the private sector will speed up action in areas such as NCDs is not supported by evidence - indeed such engagement is more likely to slow things down - especially when it comes to regulation. Voluntary promises attract much publicity, but unless backed up by regulation can be little more than diversionary public relations - here today and gone tomorrow. WHO must not allow itself to be used as a cover for corporations whose practices damage health and the [environment](#). The world's poorest people are the ones who pick up the costs of misleading marketing, [deforestation](#), monocropping, [land and sea grabbing](#) and risky technologies.

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