

**RECOMMENDATIONS OF ACTION ON SMOKING AND HEALTH
FOR THE GLOBAL ACTION PLAN TO PREVENT AND CONTROL
NON-COMMUNICABLE DISEASES**

6 March 2013

Dear Madam / Sir,

Action on Smoking and Health (ASH) welcomes the opportunity to contribute to WHO's consultations on the future Global Action Plan on NCDs (2013-2020).

Founded in 1967, ASH is one of the oldest anti-tobacco organizations in the United States. Throughout our four decades of leadership in the anti-tobacco movement, ASH has helped transform the perception of tobacco by the American public from casual acceptance as normal behavior to an unacceptable health risk.

ASH works to be a prime mover in domestic and global tobacco control through advocacy, communication and the force of law with the aim to end the worldwide disease, damage and death caused by tobacco.

We stand by the Framework Convention Alliance, a coalition of over 350 tobacco control organizations worldwide, in seeking global ratification and implementation of the WHO Framework Convention on Tobacco Control.

ASH congratulates WHO and the Member States for their work on developing a strong and comprehensive plan. We particularly welcome the multi-sectoral nature of the plan and the focus on the protection of health policies from the vested interests of the tobacco industry. At the same time, we would like to remind governments that a framework for multi-sectoral and comprehensive action on tobacco control already exists – the **WHO Framework Convention on Tobacco Control (FCTC)**.

ASH therefore calls on Member States and the World Health Organization to strengthen the Global Action Plan on NCDs by:

1.) Explicitly recognising the legally binding nature of the FCTC and its provisions:

The WHO FCTC is the first international treaty negotiated under the auspices of WHO. The WHO Global Action Plan for the prevention and control of NCDs (2013-2020) should explicitly recognise that FCTC obligations (Articles) are legally binding and that the guidelines for implementation of various articles are tools to interpret FCTC obligations.

2.) Ensuring that FCTC provisions on multi-sectoral action on tobacco control (Article 5) are in no way undermined by the multi-sectoral action on NCDs:

All 176 Parties to the WHO FCTC should fully implement their obligations under the FCTC Article 5. These legally binding responsibilities should in no way be overshadowed by the recommendations of the plan to

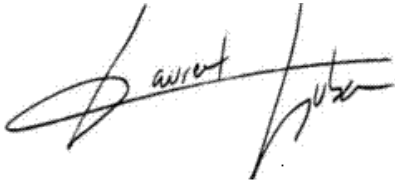
establish similar tools for NCDs. On the contrary, the NCD multi-sectoral action should build upon the existing multi-sectoral initiatives outlined in the FCTC.

3.) Explicitly recognizing the FCTC COP as the governing body for global tobacco control

The final text of the WHO plan should also explicitly recognize the role of the FCTC Conference of the Parties (COP) as the primary global forum for discussions on tobacco control implementation and accountability.

Action on Smoking and Health (ASH) stands ready to support the implementation of the FCTC and development of the WHO Global Action Plan for the prevention and control of NCDs covering the period 2013 to 2020.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurent Huber', with a stylized flourish at the end.

Laurent Huber
Executive Director