

The WHO Foundation should not accept donations from the alcohol industry

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At WHO's Executive Board meeting in January 2022, Member States failed to agree on increasing their share of mandatory financial contributions to WHO, leaving the organisation dependent on private sources of funding.¹ The recent establishment of the WHO Foundation (WHOF) has further laid bare the potential risks of WHO attracting funding from corporate actors, whose profit-driven mandate may influence the integrity and independence of WHO's work. Launched in 2020, the WHOF was created as an independent entity with the explicit intention of fundraising for WHO by 'engaging in areas where WHO is not traditionally structured to engage', including with the private sector.²

Meanwhile, Member States decided to recommend that the World Health Assembly adopt WHO's draft alcohol action plan (2022–2030) to effectively implement the global strategy to reduce the harmful use of alcohol.³ WHO's global alcohol action plan is the product of a 2-year consultation process with Member States, intergovernmental organisations and non-State actors (such as private sector entities and non-governmental organisations).⁴ WHO's consultative processes involving the alcohol industry showed inadequate implementation of its Framework for Engagement with Non-State Actors (FENSA), an organisation-wide policy that aims to manage potential conflicts of interest in WHO's interactions with non-State actors.⁵ Compared with the initial working document, the action plan's final draft also showed changes consistent with alcohol industry recommendations, such as a weakened global target to decrease 'harmful' alcohol consumption and reduced emphasis on effective SAFER interventions to reduce alcohol harms.⁶ The draft action plan cites as an operational principle that the development of alcohol policies should be protected from commercial interests,⁷ but is light on specifics as to how this will be accomplished. The alcohol industry's conflicting interests

Summary box

- ⇒ The WHO Foundation, established to fundraise for WHO, does not explicitly preclude funding from the alcohol industry, exposing WHO to potential influence by the industry's conflicting interests.
- ⇒ The WHO Foundation's Gift Acceptance Policy also lacks transparency, preventing public scrutiny of donations.
- ⇒ To protect the independence and integrity of WHO, the WHO Foundation should not accept any donations from the alcohol industry.
- ⇒ WHO needs further resources to implement stronger safeguards against alcohol industry interference, as shown in its development of an action plan (2022–2030) to effectively implement the global strategy to reduce the harmful use of alcohol.

with public health means that WHO requires robust safeguards against industry interference and the resources needed to implement them.

It remains unclear how WHOF's policies can sufficiently protect WHO from industry interference. WHO's internal guidance to staff explicitly precludes funding by or any engagement with the alcohol industry that could imply a formal joint relationship, 'the reason being that such engagements would put at risk the integrity, credibility and independence of WHO's work'.⁸ The Memorandum of Understanding between WHOF and WHO states that WHOF shall ensure that all funding it receives is 'in accordance with the principles of FENSA or any subsequent relevant policy'.² However, WHOF's Gift Acceptance Policy does not preclude donations from the alcohol industry, while maintaining that any engagement with donors should 'not compromise WHO's integrity, independence, credibility and reputation'.⁹ The initial version of WHOF's Gift Acceptance Policy (dated March 2021) placed alcohol alongside the tobacco and arms industries in the 'red' category that was 'strictly off limits' for the Foundation.¹⁰ However, this was described as having 'erroneously and inconsistently referred to the



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alcohol industry' in an email from Anil Soni, WHO's Chief Executive Officer, to the Global Alcohol Policy Alliance (dated September 2021). In an updated version of the policy (May 2021), alcohol was moved to the 'orange' category, allowing WHO to determine whether acceptance of a gift from the industry is appropriate on a 'case-by-case basis'.⁹ However, this 'orange' category has even been removed from the policy's current version (dated December 2021), which no longer specifically considers the potential harms to health of a donor's activities.¹¹ In a further development of concern, WHO has taken over the role of the COVID-19 Solidarity Response Fund to support WHO's pandemic response.¹² Although the Fund has been criticised for accepting donations from unhealthy commodity industries, it did preclude funding by the alcohol, tobacco and arms industries in 2020.^{13 14}

We question whether this apparent failure by WHO to exclude the alcohol industry is appropriate, given the alcohol industry relies for its profits on the sale of products which impair consumers' abilities to control their use and are responsible for significant harm to drinkers and others. The alcohol industry also has longstanding and close relationships with the tobacco industry and adopts strategies very similar to the tobacco industry's,¹⁵ such as corporate social responsibility activities to build credibility with policymakers, attempting to position themselves as partners in tackling alcohol harm.¹⁶ Moreover, as the alcohol industry often engages front groups to obscure its vested interests, the opaque information available on alcohol industry actors would likely undermine the effectiveness of WHO's due diligence and risk assessment processes.

We were unable to determine whether WHO has accepted any donations from the alcohol industry based on the limited information available on WHO's website.¹⁷ WHO's Gift Acceptance Policy, in line with FENSA principles, requires any engagement with donors to 'be concluded on the basis of transparency, openness, inclusiveness, accountability, integrity and mutual respect'.¹¹ However, the current policy appears inadequate to ensure transparency in WHO's interactions with donors. Specifically, the policy allows donors to remain anonymous as long as their identity is known to WHO, and does not require WHO to publish any details of its engagements with donors. To date, WHO has published a list of contributions through to 31 December 2021, totalling over US\$28 million.¹⁸ Of the 42 donations on the list, 14 were anonymised, including 10 donations of over US\$100 000. This lack of transparency also appears inconsistent with FENSA, which requires WHO to make public information on a non-State actor that it has decided to engage with, via the WHO register of non-State actors.¹⁹ To facilitate accountability, we ask that WHO publish the full details of any contributions from non-State actors, including information on the actor as required by FENSA and documentation of any due diligence and risk assessment processes undertaken by WHO.

Irrespective of transparency, WHO's reliance on private funding fundamentally places the agency at risk of influence by the conflicting interests of corporate actors, such as the alcohol industry. As improvements to the sustainability of WHO's current financing model remain uncertain, safeguards against corporate influence must be strengthened. Clarification of WHO's policy not to accept donations from the alcohol industry is an important first step.

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