



To the World Health Organization (WHO)

## A response to the Working Document for Development of an Action Plan to Strengthen Implementation of the Global Strategy to Reduce the Harmful Use of Alcohol

**01. Introduction.** By submitting this response document, the Foundation for the Advancement of Liberty, a think tank and policy research and advocacy institution based in Madrid, Spain, wishes to convey its position to the World Health Organization on the Action Plan and, furthermore, on the Global Strategy itself. The Foundation is completely opposed to both, and this document aims at making the case against them.

**02. The WHO.** The WHO is an international organization, its members being therefore sovereign states. While the Foundation considers it wise for national governments to participate in such entities in order to exchange policies, opinions and information, and to discuss global matters, it also rejects the idea that these organizations should promote particular policies to be implemented by their member states. Very often, the conclusions and recommendations adopted by these entities are used by national governments as a way to force particular policies onto their population, thus undermining the social and political debate and due decision making processes by the country's institutions. Resorting to push for a certain policy with the heavy leverage of its "international legitimacy" is in fact government overreach, and the organizations in the UN System are often complicit to this undemocratic practice, while also incurring themselves in the same type of overreach towards many weaker member states which may not wish to follow the general consensus, but are compelled to comply.

Therefore, the Foundation, in taking part in this consultative process, asks the WHO to limit itself to play the legitimate role of a policy exchange and discussion forum, rather than that of a policy making body whose decisions are presented as a sort of mandate to be followed suit by the international community.

**03. The concept of "Accelerating Action".** Related to item 02 above, EB146(14) agenda item 7.2. requested the Director-General to develop an action plan to "effectively implement the global strategy". While this wording may just be exaggerated, the intention behind it is clearly that of adopting a sort of supranational policy which countries should abide by. The very concept of "accelerating action" is of an executive nature and thus, in the Foundation's view, severely overreaches the role of international organizations such as the WHO and instead invades its member states' sovereignty and their decision making processes.

**04. Misuse of taxpayer money.** Request No. 3 in the original Executive Board document called for "adequate" funding of the work related to the harmful use of alcohol. In fact, this funding comes from the hard efforts of the member states' taxpayers. Many of those taxpayers are actually people who may disagree with the purposes of the work to be carried out. Furthermore, many of these taxpayers are companies and individuals in the alcohol industry and related industries. Therefore this request amounts to making the member states force their taxpayers to fund a "resource work" that may in fact be detrimental to their own personal or business interests or to their views and opinions. In so doing, the WHO incurs in a severe loss of neutrality and attacks the sources of income of millions of people worldwide.

**05. Damage to the economy and several industries.** As a Spanish Foundation, we focus on the damage the Action Plan and the Global Strategy will undeniably cause to Spain's economy, However, we believe this damage to be equally relevant in many other countries. Just like most other social engineering attempts derived from interventionistic thinking, this strategy fails to see the ramifications of the proposed action. These do not end in the industries producing alcoholic drinks.

The alcohol beverage industry alone accounts for around twenty billion euros in volume of business in Spain, and yet this is relatively small compared to the connected activities of the restaurant and leisure industries and, especially, tourism. Tourism accounts for 14.6% of Spain's GDP. Following the WHO's Global Strategy would be a disaster for an economy like ours, and pushing for its "acceleration" in this particular moment in time, when the Spanish economy is devastated by the Covid-19 pandemic, would be a terminal blow to Spain's economy. It is necessary to mention that our country has the highest rates of general and youth unemployment in the developed world, and it cannot afford to lose a very high number of jobs in the alcohol and related industries. A particular damage would be inflicted to Spain's wine industry. Suffice it to say that this industry's exports are over 1.8 billion euros per year, and they are thus crucial to the country's foreign trade figures.

**06. Damage to freedom.** The WHO's Global Strategy on alcohol, like so many other attacks on the consumption of certain types of substances (whether legal or illegal), is a blow on the fundamental right to individual freedom. Social engineering by national governments, too often with the excuse of "internationally sanctioned" policies adopted by the UN System's organizations, aims at diminishing the individual's sovereignty over his or her own body. We have seen the devastating effects of wrong policies like the state control of antibiotics, the failed war on drugs, or the attacks on (still) legal tobacco or various types of food, like sugar, carbonated beverages or some types of fat. This time around, it is alcohol the WHO targets. But considering the WHO's eagerness to harness the individuals and their consumption, tomorrow it may well be anything else.

Alcohol drinks are a part of Spain's and many other countries' culture, including interpersonal relations, socializing, leisure activities and cuisine. The WHO pretends to only attack the "harmful use" of alcohol, but it is not up to any national or global political entity to decide how much or which type is "harmful" and to then impose its standards onto the individual. The body is the sole possession of its inhabitant. It is up to him or her to decide on how to use it, including how much or what kind of alcohol to consume. The state is not his or her parent, and has no authority whatsoever on his or her body. Policies such as the ones envisaged by the Global Strategy are therefore an invasive interference which threatens the individual's management of his or her most precious property.

Finally, the Executive Board called on the Director-General to target marketing, advertising and promotional activities related to alcoholic beverages. This is again an intolerable aggression to freedom, this time particularly targeting freedom of expression and free trade. Also, this attack on the advertising industry and its companies and employees is yet another proof that the Global Strategy does not address truly abusive use of alcohol, but targets alcohol generally and thus aims at diminishing its public presence and its trade.

**07. The Foundation's conclusion and action.** For the reasons explained above, the Foundation asks the World Health Organization's bodies and its member states to countermand the Director-General and to stop the Action Plan and any other initiatives in pursuance of the Global Strategy, and to cancel the said strategy. Furthermore, the Foundation will join forces with any other private institutions in Spain and elsewhere to fight the WHO's policy and to call upon governments not to enforce them and upon businesses and the people to disobey.

Madrid, November 30th, 2020

***For and on behalf of the Foundation for the Advancement of Liberty,  
Juan Pina, Secretary-General***