The WHO Foundation should not accept donations from the alcohol industry

June Yue Yan Leung, Sally Casswell

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 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
alcohol industry’ in an email from Anil Soni, WHOF’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 WHOF to determine whether acceptance of a gift from the industry is appropriate on a ‘case-by-case’ basis. 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. 

In a further development of concern, WHOF has taken over the role of the COVID-19 Solidarity Response Fund to support WHO’s pandemic response. 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.

We question whether this apparent failure by WHOF 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, such as corporate social responsibility activities to build credibility with policymakers, attempting to position themselves as partners in tackling alcohol harm. 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 WHOF’s due diligence and risk assessment processes.

We were unable to determine whether WHOF has accepted any donations from the alcohol industry based on the limited information available on WHO’s website. WHOF’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’. However, the current policy appears inadequate to ensure transparency in WHOF’s interactions with donors. Specifically, the policy allows donors to remain anonymous as long as their identity is known to WHOF, and does not require WHOF to publish any details of its engagements with donors. To date, WHOF has published a list of contributions through to 31 December 2021, totalling over US$28 million. 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. To facilitate accountability, we ask that WHOF 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 WHOF.

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 WHOF’s policy not to accept donations from the alcohol industry is an important first step.

Contributors JYYL drafted the article, SC critically revised the article and approved the final version.

Funding This work was supported by Massey University, New Zealand.

Competing interests None declared.

Patient consent for publication Not applicable.

Ethics approval Not applicable.

Provenance and peer review Not commissioned; externally peer reviewed.

Data availability statement There are no data in this work.

Open access This is an open access article distributed in accordance with the Creative Commons Attribution Non Commercial (CC BY-NC 4.0) license, which permits others to distribute, remix, adapt, build upon this work non-commercially, and license their derivative works on different terms, provided the original work is properly cited, appropriate credit is given, any changes made indicated, and the use is non-commercial. See: http://creativecommons.org/licenses/by-nc/4.0/.

ORCID iD

Junee Yue Yan Leung http://orcid.org/0000-0001-8448-9584

REFERENCES

1 Guarascio F, Hunicutt T, Nebehay S. Exclusive: U.S. opposes plans to strengthen World Health Organization. 2022. Available: https://www.reuters.com/world/us-exclusive-us-opposes-plans-strengthen-world-health-organization-2022-01-21/

2 Affiliation agreement between The World Health Organization (WHO) and the foundation in support of the World Health Organization (WHO-F), 2020. Available: https://www.whofoundationproject.org/wp-content/uploads/2020/09/MOU-WHO-WHOF-signed.pdf

3 World Health Organization. Executive board 150th session. Agenda item 7. Political declaration of the third high-level meeting of the general assembly on the prevention and control of non-communicable diseases, 2022. Available: https://apps.who.int/gb/ebwha/pdf_files/EB150/B150(4)-en.pdf

4 World Health Organization. Towards an action plan (2022 – 2030) to effectively implement the Global strategy to reduce the harmful use of alcohol. Available: https://www.who.int/team/mental-health-and-substance-use/alcohol-drugs-and-addictive-behaviours/alcohol/our-activities/towards-and-action-plan-on-alcohol

5 Leung JYY, Casswell S. Management of Conflicts of Interest in WHO’s Consultative Processes on Global Alcohol Policy. Int J Health Policy Manag 2021.

6 Foundation for Alcohol Research and Education. Analysis of changes to the World Health Organization global alcohol action plan 2022-2030, 2022. Available: https://fare.org.au/wp-content/uploads/Analysis-of-changes-to-the-World-Health-Organization-Global-Alcohol-Action-Plan-2022-2030.pdf

7 World Health Organization. Executive board 150th session. Provisional agenda item 7. Political Declaration of the third high-level meeting of the general assembly on the prevention and control of non-communicable diseases, 2022. Available: https://apps.who.int/gb/ebwha/pdf_files/EB150/B150_7Add1-en.pdf

8 Torjesen I. Exclusive: partnering with alcohol industry on public health is not okay, WHO says. BMJ 2019;365:l1866.

9 WHO Foundation. Gift acceptance policy. 2021. Available: https://who.foundation/cms/wp-content/uploads/2021/03/WHOF_Gift_Acceptance_Policy_17-03-21.pdf

10 WHO Foundation. Gift acceptance policy (archived). Available: https://web.archive.org/web/20210411223410/https://who.foundation/cms/wp-content/uploads/2021/03/WHOF_Gift_Acceptance_Policy_17-03-21.pdf

11 Guarascio F, Hunicutt T, Nebehay S. Exclusive: U.S. opposes plans to strengthen World Health Organization. 2022. Available: https://www.reuters.com/world/us-exclusive-us-opposes-plans-strengthen-world-health-organization-2022-01-21/

12 Although the Solidarity Response 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 Malhotra I, Leung JYY, Casswell S. Management of Conflicts of Interest in WHO’s Consultative Processes on Global Alcohol Policy. Int J Health Policy Manag 2021.

14 Guarascio F, Hunicutt T, Nebehay S. Exclusive: U.S. opposes plans to strengthen World Health Organization. 2022. Available: https://www.reuters.com/world/us-exclusive-us-opposes-plans-strengthen-world-health-organization-2022-01-21/

15 Guarascio F, Hunicutt T, Nebehay S. Exclusive: U.S. opposes plans to strengthen World Health Organization. 2022. Available: https://www.reuters.com/world/us-exclusive-us-opposes-plans-strengthen-world-health-organization-2022-01-21/

16 Guarascio F, Hunicutt T, Nebehay S. Exclusive: U.S. opposes plans to strengthen World Health Organization. 2022. Available: https://www.reuters.com/world/us-exclusive-us-opposes-plans-strengthen-world-health-organization-2022-01-21/
11 Foundation in support of the world Health organization (WHO). Gift acceptance policy, 2022. Available: https://who.foundation/cms/wp-content/uploads/2020/11/Gift-Acceptance-Policy-English-and-French-January-2022.pdf
12 World Health Organization and World Health Organization Foundation. COVID-19 solidarity response fund, 2022. Available: https://covid19responsefund.org/en/
13 Maani N, Van Schalkwyk MCI, Petticrew M, et al. The new WHO Foundation — global health deserves better. BMJ Glob Health 2021;6:e004950.
14 World Health Organization, United Nations Foundation, Swiss Philanthropy Foundation. COVID-19 solidarity response fund Playbook: a guide for a collaborative journey, 2020. Available: https://s3.amazonaws.com/media.unfoundation.org/2022/01/EDUN01_CovidPlaybook_2021.pdf
15 Leung JYY. Summary of 2020 web-based consultation on the WHO working document developing an action plan to strengthen implementation of the global strategy to reduce the harmful use of alcohol: global alcohol policy alliance, 2021. Available: https://globalgapa.org/wp-content/uploads/2021/08/Summary-of-WHO-WD-for-GAP-consultation-2020.pdf
16 McCambridge J, Mialon M, Hawkins B. Alcohol industry involvement in policymaking: a systematic review. Addiction 2018;113:1571–84.
17 WHO Foundation. We are committed to transparency. Available: https://who.foundation/en/transparency
18 WHO Foundation. Contributions through December 31, 2021. Available: https://who.foundation/cms/wp-content/uploads/2022/03/Contribution-Table_Web-Transparency_-_Up-to-Dec-31-2021-FOR-PUBLIC-2.pdf
19 World Health Organization. Framework of engagement with non-State actors. World health assembly 69.10. agenda item 11.3, 2016. Available: https://apps.who.int/gb/ebwha/pdf_files/wha69/a69_r10-en.pdf