



Framework of Engagement with Non-State Actors (FENSA)

- The Sixty-ninth World Health Assembly has adopted FENSA
- The overarching framework of engagement with non-State actors and the WHO policy and operational procedures on management of engagement with non-State actors apply to all engagements with non-State actors at all levels of the Organization
- For the purpose of this framework, non-State actors are nongovernmental organizations, private sector entities, philanthropic foundations and academic institutions.

Rationale

- WHO is the directing and coordinating authority in global health in line with its constitutional mandate.
- The global health landscape has become more complex in many respects; among other things, there has been an increase in the number of players including non-State actors.
- WHO engages with non-State actors in view of their significant role in global health for the advancement and promotion of public health and to encourage non-State actors to use their own activities to protect and promote public health.
- WHO's engagement with non-State actors supports implementation of the Organization's policies and recommendations as decided by the governing bodies, as well as the application of WHO's technical norms and standards.
- Engagement requires a robust framework that enables engagement and serves also as an instrument to identify the risks, balancing them against the expected benefits, while protecting and preserving WHO's integrity, reputation and public health mandate.

Principles

Any engagement must:

- (a) demonstrate a clear benefit to public health;
- (b) conform with WHO's Constitution, mandate and general programme of work
- (c) respect the intergovernmental nature of WHO and the decision-making authority of Member States as set out in the WHO's Constitution;
- (d) support and enhance, without compromising, the scientific and evidence-based approach that underpins WHO's work;
- (e) protect WHO from any undue influence, in particular on the processes in setting and applying policies, norms and standards;
- (f) not compromise WHO's integrity, independence, credibility and reputation;
- (g) be effectively managed, including by, where possible avoiding conflict of interest and other forms of risks to WHO;
- (h) be conducted on the basis of transparency, openness, inclusiveness, accountability, integrity and mutual respect.

Benefits of Engagement

- The contribution of non-State actors to the work of WHO
- The influence that WHO can have on non-State actors to enhance their impact on global public health or to influence the social, economic and environmental determinants of health
- The influence that WHO can have on non-State actors' compliance with WHO's policies, norms and standards
- The additional resources non-State actors can contribute to WHO's work
- The wider dissemination of and adherence by non-State actors to WHO's policies, norms and standards

Risk of Engagement

- Conflicts of interest;
- Undue or improper influence exercised by a non-State actor on WHO's work, especially in, but not limited to, policies, norms and standard setting;
- A negative impact on WHO's integrity, independence, credibility and reputation; and public health mandate;
- The engagement being primarily used to serve the interests of the non-State actor concerned;
- The engagement conferring an endorsement of the non-State actor's name, brand, product, views or activity;
- The whitewashing of a non-State actor's image through an engagement with WHO;
- A competitive advantage for a non-State actor.



DECLARATION OF INTERESTS FOR WHO EXPERTS

Title of meeting or work to be performed, including description of subject-matter, substance (compounds and organisms), technology or process to be considered:

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Public health considerations have a primary importance in all WHO technical work. Measures need to be taken to ensure that the best possible assessment of scientific evidence is achieved in an independent atmosphere free of either direct or indirect pressures. Thus, to assure the technical integrity and impartiality of WHO's work, it is necessary to avoid situations in which financial or other interests might affect the outcome of that work.

Each expert is therefore asked to declare any interests that could constitute a real, potential or apparent conflict of interest, with respect to his/her involvement in the meeting or work, between (1) commercial entities and the participant personally, and (2) commercial entities and the administrative unit with which the participant has an employment relationship. "Commercial entity" refers to any company, association (e.g., trade association), organization or any other entity of any nature whatsoever, with commercial interests.

In addition, as a result of WHO's strong stance against tobacco use, it is considered relevant for the Organization to know whether experts working with it have, or have had, any relationship with any part of what may be called "the tobacco industry". Nevertheless, declaration of such an interest would not necessarily be considered a reason to disqualify an expert.

What is a conflict of interest?

Conflict of interest means that the expert or his/her partner ("partner" includes a spouse or other person with whom s/he has a similar close personal relationship), or the administrative unit with which the expert has an employment relationship, has a financial or other interest that could unduly influence the expert's position with respect to the subject-matter being considered. An apparent conflict of interest exists when an interest would not necessarily influence the expert but could result in the expert's objectivity being questioned by others. A potential conflict of interest exists with an interest which any reasonable person could be uncertain whether or not should be reported.

Different *types of financial or other interests*, whether personal or with the administrative unit with which the expert has an employment relationship, can be envisaged and the following list, which is not exhaustive, is provided for your guidance. For example, the following types of situations should be declared:

1. a current proprietary interest in a substance, technology or process (e.g. ownership of a patent), to be considered in - or otherwise related to the subject-matter of - the meeting or work;
2. a current financial interest, e.g. shares or bonds, in a commercial entity with an interest in the subject-matter of the meeting or work (except share holdings through general mutual funds or similar arrangements where the expert has no control over the selection of shares);
3. an employment, consultancy, directorship, or other position during the past 4 years, whether or not paid, in any commercial entity which has an interest in the subject-matter of the meeting/work, or an ongoing negotiation concerning prospective employment or other association with such commercial entity;
4. performance of any paid work or research during the past 4 years commissioned by a commercial entity with

5, any interest during the past 4 years should be declared. If the interest is no longer current, please state the year when it ceased. With respect to item 5, the interest ceases when a financed post or fellowship is no longer occupied, or when support for an activity ceases.

Assessment and outcome: The information submitted by you will be used to assess whether the declared interests constitute an appreciable real, potential or apparent conflict of interest. Such conflict of interest will, depending on the situation, result in (i) you being asked not to take part in the portion of the discussion or work affecting that interest, (ii) being asked not to take part in the meeting or work altogether, or (iii) if deemed by WHO to be appropriate to the particular circumstances, and with your agreement, you taking part in the meeting or work and your interest being publicly disclosed.

Information disclosed on this Form may be made available to persons outside of WHO only when the objectivity of the meeting or work has been questioned such that the Director-General considers disclosure to be in the best interests of the Organization, and then only after consultation with you.

Declaration: Have you or your partner any financial or other interest in the subject-matter of the meeting or work in which you will be involved, which may be considered as constituting a real, potential or apparent conflict of interest?

Yes: **No:** **If yes, please give details in the box below.**

Do you have, or have you had during the past 4 years, an employment or other professional relationship with any entity directly involved in the production, manufacture, distribution or sale of tobacco or any tobacco products, or directly representing the interests of any such entity? **Yes:** **No:** **If yes, please give details in the box below.**

Type of interest, e.g. patent, shares, employment, association, payment (including details on any compound, work, etc.)	Name of commercial entity	Belongs to you, partner or unit?	Current interest? (or year ceased)

Is there anything else that could affect your objectivity or independence in the meeting or work, or the perception by others of your objectivity and independence?

I hereby declare that the disclosed information is correct and that no other situation of real, potential or apparent conflict of interest is known to me. I undertake to inform you of any change in these circumstances, including if an issue arises during the course of the meeting or work itself.

Signature

Date

Name

Institution

WHO Nutrition Guidelines

PROCESS



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ERG/GRC

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ERG

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GRC

**WHO Steering Committee for
Nutrition Guideline Development**

Guideline
Development
Group

**Expert Advisory
Group
(NUGAG)**

Sub-Group

Diet & Health

Nutrition Actions

**COI
Background Check**



World Health
Organization

Guideline: Sugars Intake for Adults and Children (WHO Published. 2015)

Management of conflict of interest

NUGAG members

No interest was declared by the following five members:

- Professor John Cummings
- Professor Shiriki Kumanyika
- Professor Duo Li
- Dr Joerg Meerpohl
- Professor Carlos Monteiro

Management of conflict of interest

- Professor A.B.C declared that she serves on the Scientific Panel that advises the AA Sugar Association (AASA) on which nutrition research studies should be funded at AA Universities. Professor A.B.C further stated that serving on the Scientific Panel does not commit her in any way to support any policy or viewpoint of AASA. No financial benefits have been received by Professor A.B.C.
- The AASA is an organization that promotes the global competitiveness, profitability and sustainability of the AA sugar industry by providing specialist support to the cane growers and sugar millers who make up the sugar industry, and to their representative bodies, the AA Canegrowers' Association and the AA Sugar Millers' Association. This partnership is administered by the AASA Council, and the Chairmanship and Vice-Chairmanship of Council usually alternates every 2 years between a grower and a miller. AASA specialist support services extend along the entire industry value chain, starting with agricultural research and extension, and including cane testing, agricultural and engineering training, and the export marketing of raw sugar.

- However, there is a **statement on the AASA website about sugar and health, which states that “Eminent bodies such as the World Health Organization and the Food and Agricultural Organization agree that sugar, like other carbohydrate-containing foods, has an indispensable role to play in balanced diets. These bodies concluded that there is no evidence of sugar being the direct cause of lifestyle diseases such as diabetes, heart disease, obesity or cancer”.** This statement contradicts the existing guidance of WHO and also the work that the NUGAG Subgroup on Diet and Health is undertaking.

- The declared interest of Professor A.B.C's involvement as a member of the Scientific Panel of AASA could be considered as a conflict of interest despite the fact that Professor A.B.C does not receive any remuneration from AASA. It is, therefore, suggested that Professor A.B.C could continue to serve as a member of NUGAG Subgroup on Diet and Health, but that she should refrain from participating in the specific discussions and decision-making process for developing recommendations and guidelines on free sugars. She could, however, participate fully in the discussions on the guideline development process related to other subject areas such as fats and fatty acids that the NUGAG Subgroup on Diet and Health is undertaking.