

21 February 2025

To:
The UN Secretary-General
The Co-Facilitating Countries of the HLM on NCDs
The President of the UN General Assembly

Dear Secretary General,

I am writing to you further our previous exchanges on enabling meaningful engagement with the private sector to support the work of the United Nations system.

Together with a coalition of business groups representing a broad array of industries, we would like to offer our perspective on the evolving dialogue around commercial determinants of health (CDoH) ahead of the UN High-Level Meeting on Non-Communicable Diseases (NCDs) this September. We recognize that addressing NCDs is a critical global priority and that this upcoming meeting presents an opportunity to align efforts across sectors to achieve the ambitious targets set by the Sustainable Development Goals (SDGs).

In particular, we believe it is essential to maintain a balanced and inclusive approach to partnerships, dialogue and collaboration. This approach should be one that engages all stakeholders—including those in the private sector—in the collective effort to improve public health outcomes. We are concerned that an overly restrictive interpretation of the CDoH narrative could limit the participation of responsible industries that are eager to collaborate constructively in reducing the global burden of NCDs.

Embracing the SDGs' Vision of Partnership

The SDGs emphasize a “whole of society” approach, highlighting the importance of cooperation between governments, civil society, and businesses. SDG 17, “Partnerships for the Goals,” recognizes that leveraging the resources, expertise, and innovations of the private sector is vital for scaling solutions and addressing complex challenges such as NCDs, climate change, and economic development.

This inclusive spirit of partnership is central to achieving sustainable development and should guide the approach to addressing NCDs. We believe that meaningful progress can only be achieved when all sectors, including responsible industry actors, are welcomed to the table.

Responding to the CDoH Narrative: A Call for Balanced Engagement

While discussions on the commercial determinants of health have drawn attention to the role of some industries in contributing to health policy dialogue, we are concerned that an adversarial interpretation overlooks opportunities for constructive engagement with responsible economic operators. Protecting against all conflicts of interests – not just those

involving the private sector – is essential to enable constructive and collaborative dialogue. Where these rules of engagement are in place, however, all responsible stakeholders should be included in settings where progress towards public health outcomes is discussed. Recent policy discussions and reports, underpinned by the CDoH narrative, have threatened the long-standing inclusive, whole-of-society approach promoted by the UN, and risk limiting stakeholders' valuable contributions to the fight against NCDs.

Risks of Exclusion to Achieving the SDGs

Restrictive policies based on CDoH risk undermining the SDG framework's emphasis on inclusive partnerships. The SDGs recognize that solving complex global challenges requires collaboration among all sectors, including responsible businesses that are committed to driving positive change. Excluding industry from discussions on NCDs may result in missed opportunities for innovation, investment, and consumer engagement—elements that are critical to achieving meaningful health improvements.

The battle against NCDs can benefit from engaging responsible industry actors in the development of practical, sustainable health solutions, including preventative measures and risk minimization. A more inclusive approach would allow for the leveraging of appropriate industry expertise and resources to scale initiatives that promote healthier lifestyles and advance the goals of the NCD agenda.

A Constructive Path Forward

Earlier this year, the UN concluded the Global Pact for the Future, which calls on the international community to “Encourage the contribution of the private sector to addressing global challenges. (para 55. c)

As the UN prepares for the 2025 High-Level Meeting on NCDs, we respectfully encourage your mission to support a balanced and collaborative approach to policy development, which does invite meaningful private sector engagement. We believe that the success of this meeting, and of the broader NCD agenda, will depend on fostering an environment where all responsible stakeholders are engaged in dialogue and action. We would welcome an opportunity to discuss how to advance measurable progress and accountability through inclusive dialogue, partnership, and mutual transparency, including working with the private sector.

By embracing the spirit of the SDGs, we can ensure that policies are both effective and sustainable, tapping into the innovations and commitments of responsible businesses that are eager to be part of the solution. We stand ready to work alongside governments and civil society in the fight against NCDs, contributing to a healthier, more equitable future for all.

Thank you for your consideration of this important matter. We look forward to your support in promoting a partnership-based approach to global health.

Yours sincerely,



John W.H. Denton AO
Secretary General
International Chamber of Commerce

Cc: UN Deputy Secretary General; UN Permanent Representatives

Alianza Latinoamericana de
Asociaciones de la Industria de
Alimentos y Bebidas (ALAIAB)



Consumer Brands Association
(CBA)



International Alliance for
Responsible Drinking (IARD)



International Confectionery
Association (ICA)



International Council of
Beverages Associations (ICBA)



International Food and Beverage
Alliance (IFBA)



Food Industry Asia (FIA)



The Voice of Wine (FIVS)



US Council for International
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World Brewing Alliance (WBA)



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