



May 10, 2018

The Honorable Alex Azar
Secretary of Health and Human Services
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Azar:

As key private sector stakeholders that make significant and positive contributions to economic growth and public health in the United States and around the world, we are writing to express concerns about a number of topics that will be addressed during the May 21-26 World Health Assembly (WHA). Strong U.S. government leadership will be essential to address these concerns and to ensure that World Health Organization (WHO) activities are aligned with the organization's core mission and with American priorities, including promoting economic growth and innovative solutions to global health challenges. We urge you and your staff to raise these concerns and issue a strong call for greater transparency to all stakeholders, accountability to member states, and mission focus in assessing current and future activities at the WHO.

Our associations represent millions of producers, manufacturers, and workers in diverse industries such as agriculture, biopharmaceuticals, chemicals, dairy, and food and beverage. We support effective U.S. engagement at the WHO and other global institutions as a means of demonstrating U.S. leadership; promoting sustainable development; and advancing a fairer, more stable, international system that supports American jobs and our country's economic and foreign policy interests. If operating transparently and consistently with its core mission and strengths, the WHO can be valuable in promoting sustainable global health outcomes as part of a system that accounts for the interests of all stakeholders.

Our associations, however, are extremely concerned that a growing number of WHO initiatives, including several on the formal WHA agenda, do not meet these criteria. Instead, these initiatives reflect efforts to stretch the WHO's scope into areas beyond its core mission and a lack of accountability to member states. Moreover, these initiatives fail to align with good regulatory practices, notably through a lack of transparency and insufficient reliance on sound science and evidence-based approaches.

More broadly, an increasing number of WHO initiatives seem to devalue or dismiss the contributions and expertise that private sector actors can contribute to improve health outcomes and support public health initiatives, and instead reflect an exclusionary approach that will impact global health in negative ways. Examples of highly troubling initiatives include efforts to undermine U.S. innovation and competitiveness around access to health products, promotion of problematic tax policies and marketing restrictions in the context of non-communicable diseases and initiatives limiting engagement with the private sector and managing conflicts of interest.

Stronger leadership from the United States and other member states is more important than ever to shape a proactive, reform-based, mission-focused WHO agenda and to hold the organization accountable when it inappropriately pursues problematic initiatives that do not take into account the full spectrum of the issues at hand.

We greatly appreciate HHS's recent efforts to accomplish these goals and want to recognize particular efforts by HHS and the U.S. interagency team to strengthen coordination and take strong positions at the January 2018 WHO Executive Board (EB) meeting. We also wish to note how helpful your role can be: for example, [comments at the May 2017 WHA](#) by your predecessor (former Secretary Tom Price) that highlighted the importance of "transforming" the WHO to deliver on its "most important mission: ensuring a rapid and focused response to potential global health crises" sent a clear, strong message of the United States' commitment to global health and its expectation to see transparency, accountability, and mission focus.

For each item on the WHA agenda, our associations request that HHS verify that WHO activities and recommendations:

- Are consistent with U.S. priorities, interests, and regulatory approaches;
- Would contribute to a rapid and focused response to legitimate global health crises;
- Are fully consistent with international norms and standards, including those set by Codex Alimentarius and the World Trade Organization;
- Are accountable to, and driven by, member states such as the United States and reflect international best practices and transparent consultation with the private sector and other key stakeholders; and
- Reflect sound science, and robust analysis of risk and return that consider the full range of direct and indirect costs of proposed policies.

Where WHO initiatives or recommendations do not meet these criteria, the United States should work with other member states to revise, reformat, or reject the activity until it can meet those basic principles. We encourage U.S. government efforts to use all available diplomatic tools (including activation of HHS, Department of State, Department of Commerce, Office of the U.S. Trade Representative and other agency representatives in Washington, Geneva, and key U.S. embassies) to build support among other countries to address inappropriate initiatives.

We appreciate the work that has been done to date, and the stronger U.S. government coordination on these issues. We encourage HHS to continue to work closely, regularly and proactively with its interagency counterparts throughout the WHA to ensure that WHO's agenda effectively and efficiently implements its core mission.

Our associations look forward to working with HHS and other federal agencies to ensure successful discussions at the WHA that promote U.S. interests in promoting health, sustainable development, innovation, trade, and competitiveness.

Sincerely,

American Chemistry Council
Biotechnology Innovation Organization
Corn Refiners Association
Distilled Spirits Council of the United States
Grocery Manufacturers Association
International Dairy Foods Association
National Association of Manufacturers
National Milk Producers Federation
Pharmaceutical Research and Manufacturers of America

CC: Mr. Eric Hargan, Deputy Secretary Department of Health and Human Services

CC: Mr. Garrett Grigsby, Director, Office of Global Affairs, Department of Health and Human Services