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May 16, 2018

RE: WHO Independent High-level Commission on Non-Communicable Diseases

Dear Commissioners:

On behalf of the more than 58,000 members of the Obesity Action Coalition (OAC), a National non-profit organization dedicated to giving a voice to the individual affected by the disease of obesity, we appreciate the opportunity to participate in this public consultation on the draft report of the World Health Organization (WHO) Independent High Level Commission on Non-Communicable Diseases (NCDs).

Since the goal of this commission is to intensify political action to prevent premature death from non-communicable diseases, we are shocked that the commission fails to include obesity in the list of NCDs that countries need to address.

Similar to many other chronic disease states, obesity requires a multidisciplinary treatment approach. This approach must encompass the best standards of care, both in terms of the treatments chosen, and the care coordination and clinical environment in which they are delivered. Unfortunately though, many health coverage programs across the world continue to exclude coverage for obesity treatment services -- partly due to shortsighted cost savings efforts and partly due to the false assumption that these services are either not medically necessary, or not in line with generally accepted standards of medical care despite scientific evidence to the contrary.

These discriminatory coverage practices, combined with the growing scientific evidence surrounding obesity, led the American Medical Association (AMA) to declare obesity as a chronic disease in 2013 and subsequently adopt formal policy supporting “patient access to the full continuum of care of science-based obesity treatment modalities such as behavioral, pharmaceutical, psychosocial, nutritional, and surgical interventions." Numerous other healthcare professional and patient organizations support the AMA policy because these groups recognize that obesity is associated with, or a precursor to, more than 90 other chronic medical conditions including cardiovascular disease, diabetes, and cancer.

Across the United States, more than one in three adults, one in six children (ages 2-19) and one in 11 young children (ages 2-5) are affected by obesity. Absent change, some projections show that 50 percent of Americans will have obesity by 2030. Worldwide obesity rates have nearly tripled since 1975. In 2016, more than 650 million adults (18 years and older) were affected by obesity and more than 340 million children and adolescents (ages 5-19) had overweight or obesity.

The lack of recognition of obesity as a chronic disease in the recommendations from this commission will only further embolden Heads of State and Governments around the world to delay meaningful action toward achieving universal coverage of obesity treatment. **However, recognizing obesity as a chronic disease by the commission would have a profound impact on governments across the world to help ensure: that more resources are dedicated to much needed research, prevention and treatment; that encouragement is given to healthcare professionals to recognize obesity treatment as a necessary and valued professional specialty; and that there is a reduction in the stigma and discrimination experienced by individuals living with this chronic disease.**

Therefore, the OAC respectfully asks that obesity be included as one of the listed non-communicable diseases in the first report of the WHO Independent High-Level Commission on Non-Communicable Diseases and to recommend to Heads of State and Governments that they:

1. Recognize obesity as a chronic disease and integrate obesity into Universal Health Coverage
2. Reaffirm their commitment to reducing obesity in children, adolescents, and adults
3. Prioritize policies that tackle the social and commercial determinants of obesity, including obesity stigma and weight-based discrimination.

We thank the Commissioners for the opportunity to comment on this draft report and hope you will take our recommendations into account when revising the draft report. Please do not hesitate to contact me with any questions or concerns relating to our comments. The OAC looks forward to continued dialogue and engagement on this issue.

Sincerely,

Joseph Nadglowski, Jr.