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Letter to Editor

The WHO Foundation Needs Stronger Safeguards Against Health-Harming Industries

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Dear Editor,

We write to raise our concerns about the acceptance by the World Health Organization Foundation (WHOF) of a donation from an alcohol and tobacco retailer.

WHOF is an entity separate from World Health Organization (WHO) but created to mobilise new funding sources for WHO in difficult times, including from philanthropic foundations, businesses, and individuals. Since its inception in 2020, WHOF has directed over US $100 million in contributions to support WHO's work.[1] To protect WHOF from any "undue influence," the foundation's Gift Acceptance Policy states that due diligence and risk assessment will be conducted before receiving contributions.[2] However, this policy does not consider the harms to health of a donor's activities, and only explicitly precludes contributions from the tobacco and arms industries.[3] This is in line with WHO's Framework of Engagement with Non-State Actors (FENSA), which outlines the steps that WHO should take to manage risks in its interactions with private sector and other non-governmental entities, including avoiding conflicts of interest.[4] The alcohol industry is not specifically excluded from contributing to WHOF or engaging with WHO.[3] Nonetheless, WHO staff have been told to avoid any partnerships or collaborations with the alcohol industry, as such engagements would "put at risk the integrity, credibility, and independence of WHO's work."[5]

Reviewing WHOF's published lists of contributions,[6] we found that in 2022, WHOF accepted a donation of US $100 000 from Duty Free Shoppers (DFS) Group.[7] This company has a global network of stores that sell duty-free goods, with its United States website showing "wines and spirits" and "tobacco" as two of the retailer's main product categories.[8] DFS is also a subsidiary of LVMH Moët Hennessy – Louis Vuitton,[9] one of the world's largest transnational alcohol companies. The donation by DFS was earmarked for WHO's "Go Give One" campaign to promote COVID-19 vaccine equity.[10] Upon publication of our paper about United Nations (UN) partnerships with the alcohol industry in this journal,[7] we received a response from WHOF confirming the donation but disputing the characterisation of DFS Group as part of the alcohol industry, describing DFS as a "global travel retail company that sells a wide range of products that are not limited to alcohol products." In addition, WHOF stated that "engagement with entities with partial or indirect involvement with such certain sectors and industries are carefully assessed as part of WHO Foundation's due diligence and gift acceptance framework."

WHOF's response calls into question the robustness of its processes to protect WHO from influence by health-harming industries. While a diversified retailer may not be perceived as being part of the tobacco industry, WHOF's Affiliation Agreement with WHO states that "for the avoidance of doubt, under no circumstances shall the WHOF either receive or disburse funds or engage with any entities that form part of or are controlled by the Tobacco and Arms industries."[11] WHO's FENSA and Guide for Staff on Engagement with Non-State Actors have also adopted a broad definition of the tobacco industry and "non-State actors that further the interests of the tobacco industry."[5,12] Duty-free tobacco and alcohol directly undermine government controls on these products through lower prices and avoiding taxation. Article 6 of WHO's Framework Convention on Tobacco Control thus recommends the prohibition or restriction of duty-free tobacco products.[13] Therefore, acceptance of this gift from DFS Group appears to be inconsistent with the principles underpinning FENSA, developed to protect WHO's integrity, reputation and public health mandate.

This is not the first time donations to WHOF have come under scrutiny. In 2021, WHOF accepted a donation from formula milk company Nestlé, which made WHO "very upset" as Nestlé had not been adherent to WHO's International Code on Marketing of Breastmilk Substitutes.[14] WHOF has since committed to receive contributions only from companies that do not compromise "WHO's integrity, independence, credibility, and reputation."[14] It is unclear how the subsequent donation from DFS Group is consistent with this statement.

This donation from an alcohol and tobacco retailer illustrates the limitations of WHOF's governance structure. While WHOF claims to align with WHO's FENSA principles, its arms-length relationship with WHO has facilitated less

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transparency and accountability in its engagement with health-harming industries.[15] Shifts in WHOF's due diligence practices further contradict claims that its funding arrangements do not pose conflicts of interest for WHO.[15] In the first version of WHOF's Gift Acceptance Policy (dated March 2021), the alcohol industry was initially placed alongside the tobacco and arms industries as "strictly off limits," but has been removed from the current policy (dated December 2021).[3] Meanwhile, wide-ranging partnerships between the alcohol industry and various UN entities suggest a lack of effective safeguards against industry influence within the wider UN system.[7] For example, LVMH and its subsidiaries are partners to both the UN Children's Fund (UNICEF) and the UN Educational, Scientific and Cultural Organization (UNESCO).[7]

Given the alcohol and tobacco industries' clear conflicting interests with health, we ask that WHOF carefully review its Gift Acceptance Policy to exclude all contributions from these industries and those that promote their interests. The alcohol and tobacco industries use similar political and public relations strategies to build credibility as good corporate citizens.[16] Sponsorship of WHO activities via WHOF, regardless of the contribution's size or intended use, is a valuable opportunity for the industries to legitimise themselves as "partners" to WHO. The two industries also have a long history of collaboration and co-ownership, so it is not uncommon for retailers to sell both products. These industries comprise a wide range of actors, including but not limited to producers, wholesalers, distributors, retailers, hospitality providers, and marketers.[17] Transnational corporations also grow by mergers and acquisitions of subsidiary companies, diversifying the products and services that they offer, as LVMH has done. As a retailer of alcohol and tobacco products, DFS Group should be considered part of the alcohol and tobacco industries.

WHOF's Affiliation Agreement with WHO makes it clear that WHOF should avoid activities "whose execution would result in conflicts of interest (including a violation of FENSA principles) for WHO that cannot be mitigated in coordination with WHO."[11] To protect its own integrity, WHO must hold WHOF accountable for this funding decision.

Disclosure of artificial intelligence (AI) use
Not applicable.

Ethical issues
Not applicable.

Conflicts of interest
Authors declare that they have no conflicts of interest.

Authors' contributions
Conceptualisation: Sally Casswell.
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