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Draft Framework of engagement with non-State actors:

Comments by the Islamic Republic of Iran

General Comments

- In order for WHO to fulfil its constitutional mandate and core function, the integrity and independence of the Organization must be protected and safeguarded, and public confidence maintained.
- The draft framework of engagement a good basis for establishing and, where appropriate, strengthening relations with non-State actors, as long as any possible risks and conflicts of interest are accurately described and transparently managed, and if the benefits of engagement are weighed carefully against the risks involved. Improvement of the framework, including its monitoring and evaluation components is very important.
- The respective roles of the governing bodies and of the Secretariat should be clarified and private sector involvement should be open to Member States' oversight.

Criteria on Regulating Financial Contributions

- Clear criteria should be set to regulate the financial contributions from NSA to avoid the risk of donor-driven agenda. The Framework puts a limited set of regulation on funding from the private sector but it is insufficient, for instance, Para 29 states that WHO can accept contributions from the private sector for financing staff salary.
- A ceiling on the voluntary contributions from NSA should be established, and any contribution beyond that amount should go to the core voluntary fund, which gives enough freedom for the Secretariat to allocate resources in under funded programmes. Member States Assessed Contributions should be allocated to the programmes that are unfunded under Voluntary Contributions.
- Another serious lapse in the new draft Framework is the absence of appropriate safeguards on WHO's engagements with NSA for evidence gathering and technical

collaborations. There should be adequate safeguards to avoid conflict of interest and commercial interest-driven public health policy making and norms and standard setting.

- The draft policy states that financial contribution can be accepted to finance the salary of the specific staff or post if it could not give rise to a real or perceived conflict of interest to WHO's work. On the contrary, accepting private sector contribution to finance the salary of WHO staff in clear defiance of the provisions of draft policy would undermine the independence and integrity of WHO.

Evaluation of the framework

- A process for evaluation of the Framework, is missing from the draft policy while this policy would have far-reaching implications for the Organization, the evaluation function should be embedded into the framework in order to allow for regular review, by the Health Assembly through the Executive Board, of the application of the framework; identification of problems, obstacles and other challenges; and the identification of lessons learnt with a view to informing future decisions on the revision of the Framework two, three or five years after its approval.

Involvement of Member States in oversight and management of engagement

- The oversight function of Member States in respect of engagement with non-State actors should be strengthened, by establishing a mechanism to oversee implementation of the engagement policy and report back to the Executive Board and World Health Assembly, and allow the governing bodies to provide guidance on the interpretation and implementation of the framework of engagement and also allow the governing bodies to request clarification if so required to address any inconsistency in the implementation of the framework.
- Executive Board and WHA should have a Standing agenda item, that the aforementioned mechanism regularly report to the governing bodies on the engagement of the Organization with non-state actors.
- With the aim of enhancing transparency and providing tools for overall overseeing by member states the Break-down of the received funds and its allocation should be reported to the EB and WHA.