



NCD ALLIANCE
SCOTLAND

NCD Prevention: A Commercial Determinants of Health Approach

A 10-Year Vision for a Healthier Scotland

Summary Report

Non-communicable Disease (NCD) Alliance Scotland, in collaboration with public health experts from around the world, has developed a comprehensive 10-year vision aimed at creating a healthier and fairer future for Scotland. This vision is supported by public engagement work commissioned by NCD Alliance Scotland and delivered by the Diffley Partnership and Children in Scotland.

This vision focuses on eliminating the burden of preventable NCDs, which are the leading cause of death and ill health in Scotland. In 2023, NCDs were responsible for over 52,000 deaths, accounting for 83% of all deaths in Scotland.¹ These diseases, including heart disease, cancer, diabetes, Alzheimer's, and lung disease, significantly impact the health and well-being of the population, causing chronic ill-health, disability, and premature death.

Scotland's health is in a state of decline, with the country experiencing the lowest life expectancy in Western Europe.² The disparity in health outcomes is stark, with life expectancy in the most deprived areas being 25–26 years lower than in the least deprived areas.³ This gap highlights the deeply entrenched health inequalities that exist within our society.

The burden of NCDs is projected by ScotPHO to increase by 21% by 2043, further exacerbating the impacts that NCDs have on our society.⁴ Not only are people dying younger, but they are also living fewer years in good health.

Preventable NCDs are a major factor behind Scotland's poor health outcomes. Key drivers include the consumption of alcohol, tobacco, and unhealthy food and drink products. NCD Alliance Scotland has come together to tackle the consumption of these health-harming products through the adoption of a commercial determinants of health (CDoH) approach to public health and NCD prevention.

The CDoH refers to the actions, practices and systems through which commercial actors impact people's health. Some of these actions do contribute positively to health, however, some contribute substantial negative effects; particularly actions by the alcohol,

ENDNOTES ON PAGE

Reference 1

Reference 2

Reference 3

Reference 4

tobacco, and HFSS food and drink industries. These negative effects can be attributed to commercial actions connected to price, marketing, and availability, making these unhealthy products more affordable, accessible, and acceptable.

Reducing the influence of these industries through policy action over the next decade is essential for protecting public health and creating a healthier Scotland for our current and future generations.

This vision aims to create a Scotland where public health is prioritised over commercial interests, and health inequalities are reduced. This includes supporting existing government strategies on tobacco, alcohol, and diet and healthy weight, and taking a comprehensive approach to public health prevention through a cross-product approach. By addressing the commercial determinants of health and implementing systemic changes, Scotland can improve health outcomes and reduce the burden of NCDs, ensuring a healthier future for all.

The vision follows five key principles, with a chapter covering key themes and actions for each.

Principle 1:

Adopt a Commercial Determinants of Health Approach to Public Health

Principle 2:

The Effective Governance of the Commercial Determinants of Health

Principle 3:

Restrict the Marketing of Health-Harming Products

Principle 4:

Take Action on the Price of Health-Harming Products

Principle 5:

Restrict the Availability of Health-Harming Products

1

Principle 1:**Adopt a Commercial Determinants of Health Approach to Public Health**

Evidence of the harms currently being caused by health-harming products tells us that the current policy approach to tackling them is insufficient and often too product-specific, failing to address the systemic issues that drive their consumption. That is why NCD Alliance Scotland's 10-year vision proposes a new approach to reducing consumption of health-harming products in Scotland through a focus on the commercial determinants of health (CDoH).

The CDoH approach emphasises the role of commercial practices in driving health inequities, particularly through the marketing, pricing, and availability of health-harming products, among other actions.

This approach highlights the importance of shifting the focus from individual behaviours to systemic policy changes that create healthier environments. It also argues that commercial actors, especially those in the alcohol, tobacco, and HFSS food industries, have a substantial negative impact on public health. These industries often rely on high consumption levels for revenue, creating a conflict of interest with public health goals. This approach, therefore, aims to reduce the influence of these industries by implementing policies that govern their practices, restrict marketing and availability, and regulate prices to make unhealthy products less affordable.

This principle also considers the need to change the approach to our communication around NCD prevention. It advocates for a narrative that holds commercial actors accountable and highlights the systemic nature of health harms, rather than blaming individuals. By adopting a CDoH approach, Scotland can create a more equitable health landscape, reduce health inequalities, and improve overall public health outcomes.

2

Principle 2:

The Effective Governance of the Commercial Determinants of Health

The effective governance of the CDoH is a key step to achieve a healthier Scotland. This principle seeks to address the inherent conflict of interest between public health aims and the profit-driven motives of industries that produce health-harming products. These industries often position themselves as stakeholders in public health, despite their primary interest being to maintain high consumption levels of their products, which directly conflicts with public health objectives.

The principle also addresses how these industries influence health policy through lobbying, legal challenges, and other tactics to delay or weaken public health measures. It stresses the importance of excluding these conflicted actors from the policy-making process to ensure that public health policies are not compromised. However, it highlights how effective governance also involves engaging with non-conflicted actors and establishing clear roles and spaces for commercial actors, ensuring transparency and accountability.

Economic arguments around the impacts of public health interventions are often made by these industries, which are typically exaggerated and misleading. Instead, this vision proposes that improving public health can have positive economic impacts, as healthier populations are more productive and less burdened by healthcare costs. It also calls for stronger governance frameworks, similar to those used for the tobacco industry; to manage conflicts of interest and regulate the influence of health-harming industries. This would create a future where public health policies are free from the influence of health-harming industries, promoting a healthier and more equitable society.

3

Principle 3: Restrict the Marketing of Health-Harming Products

Principle 3 discusses the significant impact that marketing by health-harming industries has on consumer behaviour. Marketing strategies, including advertising, sponsorship, and product packaging, play a crucial role in normalising and driving the consumption of health-harming products. Lessons from tobacco marketing interventions show that actions to address marketing are crucial to the process of de-normalising the consumption of harmful products.

The impact of marketing is not felt equally across our communities, with groups such as children and young people and those from lower socio-economic backgrounds most exposed to health-harming product marketing in their everyday lives.

Industries invest heavily in marketing to make these products desirable, often linking them to cultural identity, as seen with Scotland's whisky industry. Corporate social responsibility (CSR) activities by health-harming industries are also used as marketing tools to improve their public image and position themselves as responsible stakeholders. These activities can undermine public health efforts by shifting focus away from the health harms caused by their products.

This chapter advocates for the increased regulation of marketing activities to protect public health, which requires a comprehensive approach involving both the Scottish and UK Governments. By restricting the marketing of health-harming products, Scotland can create healthier environments and reduce the consumption of these products, reducing industry influence over our everyday choices.

4

Principle 4:

Take Action on the Price of Health-Harming Products

Principle 4 emphasises the need for measures on the price of health-harming products. It discusses how lower prices and tools like promotions increase the accessibility and normalisation of these products, driving consumption.

Action on pricing strategies can help create environments where healthy choices are more accessible. The World Health Organization (WHO) recommends price interventions as the most cost-effective way to reduce harm from health-harming products. Price interventions are particularly important in deprived communities, where the sale of cheap health-harming products is more prevalent. These communities experience the most harm from health-harming products and interventions must consider the impact on those experiencing poverty, ensuring that measures to raise prices do not disproportionately affect them.

This principle also explores the use of fiscal measures, such as taxes and levies, by governments, and how these can be effectively implemented to restrict the pricing strategies used by health-harming industries on their products. It advocates for the application of the “polluter pays” principle to health-harming industries, where commercial actors profiting from harmful products should contribute to the societal costs of these harms. This approach could fund treatment, care, and prevention efforts, and subsidise healthier products.

Effective interventions, like high tobacco taxes and Scotland’s minimum unit pricing (MUP) for alcohol, have been implemented. However, more action is required across all product areas, including regulating novel tobacco products and ensuring healthier food options are affordable. To achieve this, comprehensive and equitable fiscal measures are required to reduce the consumption of health-harming products and improve public health.

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Principle 5: Restrict the Availability of Health-Harming Products

Principle 5 discusses the importance of restricting the availability of health-harming products to reduce their consumption and improve public health.

Our environments can significantly impact health, with high availability of health-harming products acting as a form of marketing and being a key driver of their consumption.

In Scotland, the high availability of health-harming products is a significant issue and is unequally distributed. Research shows that the number of alcohol outlets and their hours of sale are associated with higher levels of alcohol consumption and harm. Tobacco and related products, especially vapes, are also widely available in Scotland, which encourages the uptake of consumption among children and undermines cessation efforts for adults. The availability of HFSS foods is another driver of ill health, particularly in the out-of-home (OOH) sector, where most food and drink options are high in fat, salt, or sugar.

Principle 5 also discusses the link between availability and health inequalities, with health-harming products being more accessible and heavily marketed in lower-income communities. To reduce these inequalities action is required to reduce the number of outlets selling health-harming products and support small businesses in transitioning to healthier alternatives with a focus on improving choice in our most deprived communities.

Treatment Services

While action to tackle the commercial determinants of health is crucial and the primary focus of our strategy, we recognise that how and when support is provided to individuals who are already impacted by the consumption of health-harming products is also key to the prevention of harm.

In our 10-year vision, we outline a number of key principles for treatment and support services, including industry independence, proportionate investment based on need, and improved data collection.

It also emphasises the role a commercial determinants of health approach can play in addressing stigma for those affected by health-harming products, which can increase interactions with services. It also discusses how the introduction of polluter pays levies can serve to support the funding of these services and reduce harm from health-harming products.

Timescales for Action

Themes

1. Adopt a Commercial Determinants of Health Approach to Public Health
2. The Effective Governance of the Commercial Determinants of Health
3. Restrict the Marketing of Health-Harming Products
4. Take Action on the Price of Health-Harming Products
5. Restrict the Availability of Health-Harming Products

Timescale Definitions

- Short:** Policies that could be introduced within the next 1–3 years based on existing evidence
- Medium:** Policies that could be introduced within the next 3–7 years based on developing evidence
- Long:** Policies that will require further exploration and research, as well as significant policy development to implement



Cross Product

Theme	Call	Timeframe
1	Appoint a Future Generations Commissioner	Short
4	Introduce Polluter Pays Levies on Health-Harming Products	Short
1	Develop a Public Health Communication Strategy	Medium
2	Strengthen Enforcement Across all Products	Medium
3	Mandatory Corporate Social Responsibility Guidelines	Medium
1	Fund Research Programmes Across the Commercial Determinants of Health	Medium
2	Develop a Governance Framework for The Commercial Determinants of Health	Long
2	Address Data Gaps Across all Products	Long
3	Digital Marketing Regulation	Long
5	Encouragement and Incentivisation for Small Businesses to Transition Away From Selling Health-Harming Products	Long
5	Include Stronger Provisions to Improve Public Health in National Planning Framework 5	Long



Alcohol

Theme	Call	Timeframe
3	Restrict Alcohol Marketing	Short
3	Introduce Mandatory Labelling for Alcoholic Drinks	Short
4	Introduce an Automatic Inflation-Based Up-rating Mechanism for Minimum Unit Price	Short
5	Introduce the Physical Separation of Alcohol in Retail Premises	Short
4	Ban all Promotional Deals on Alcohol	Medium
5	Stronger Control of Off-Trade Alcohol Availability	Long



High Fat Sugar and Salt Foods

Theme	Call	Timeframe
4	Restrict Price Promotions for HFSS Products	Short
4	Maximise the Potential of the Soft Drinks Industry Levy	Short
3	Standardise the Traffic-Light System on Packaging	Medium
3	Restrict the Marketing of HFSS Food and Drinks	Medium
4	Incentivise the Production of Healthier Food and Drinks, Including Through Financial Incentives Beyond the Soft Drinks Industry Levy	Medium
5	Develop Measures to Manage and Reduce the Availability of HFSS in the Out of Home (OOH) Sector	Medium
5	Regulate HFSS Food Availability Beyond School Gates	Medium
4	Subsidise Healthy Food and Drinks	Long



Tobacco and Related Products

Theme	Call	Timeframe
3	Restrict E-Cigarette Marketing	Short
4	Increase Tax on Roll-Your-Own Tobacco	Short
5	Extend Smoke-Free Spaces	Short
5	Raise the Age of Sale for Tobacco	Short
4	Introduce Minimum/Maximum Pricing for Tobacco	Medium
5	Make the Tobacco and NVP Register Conditional	Medium
5	Reduce the Number of Tobacco Retailers	Long
5	Reduce/Remove Nicotine from Tobacco Products	Long

References

- 1 National Records of Scotland. (2023). List of Data Tables. Retrieved from <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/vital-events/general-publications/vital-events-reference-tables>
- 2 National Records of Scotland. (2023). Healthy Life Expectancy 2019-2021 Report. Retrieved from <https://www.nrscotland.gov.uk/files/statistics/healthy-life-expectancy/19-21/healthy-life-expectancy-19-21-report.pdf>
- 3 Ibid.
- 4 ScotPHO. (2022). Burden of Disease. Retrieved from <https://www.scotpho.org.uk/comparative-health/burden-of-disease/overview>



NCD ALLIANCE SCOTLAND

NCD Alliance Scotland is a coalition of 24 health organisations and charities campaigning for action to reduce the ill health and death driven by health-harming products (alcohol, tobacco and unhealthy food and drinks). Originally formed in 2020, the group has grown in recent years and has established itself as a key network to campaign for progress in prevention and reduction of non-communicable diseases.

More information can be found here:

www.bhf.org.uk/what-we-do/in-your-area/scotland/ncd-prevention-report