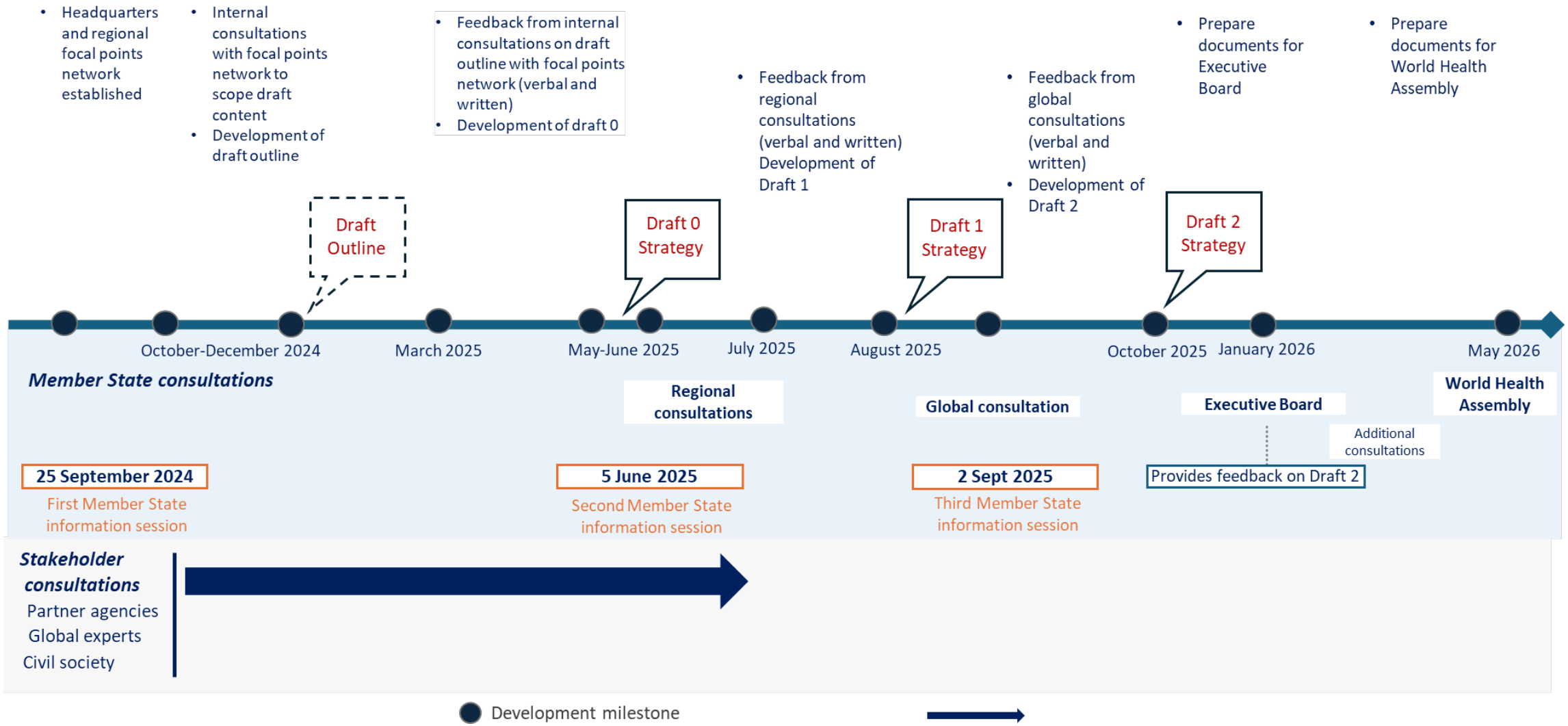
Economics of Health for All Strategy

Comments of additional comments received 13 March 2026

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Vision

“A world in which the economy serves and benefits from health for all’

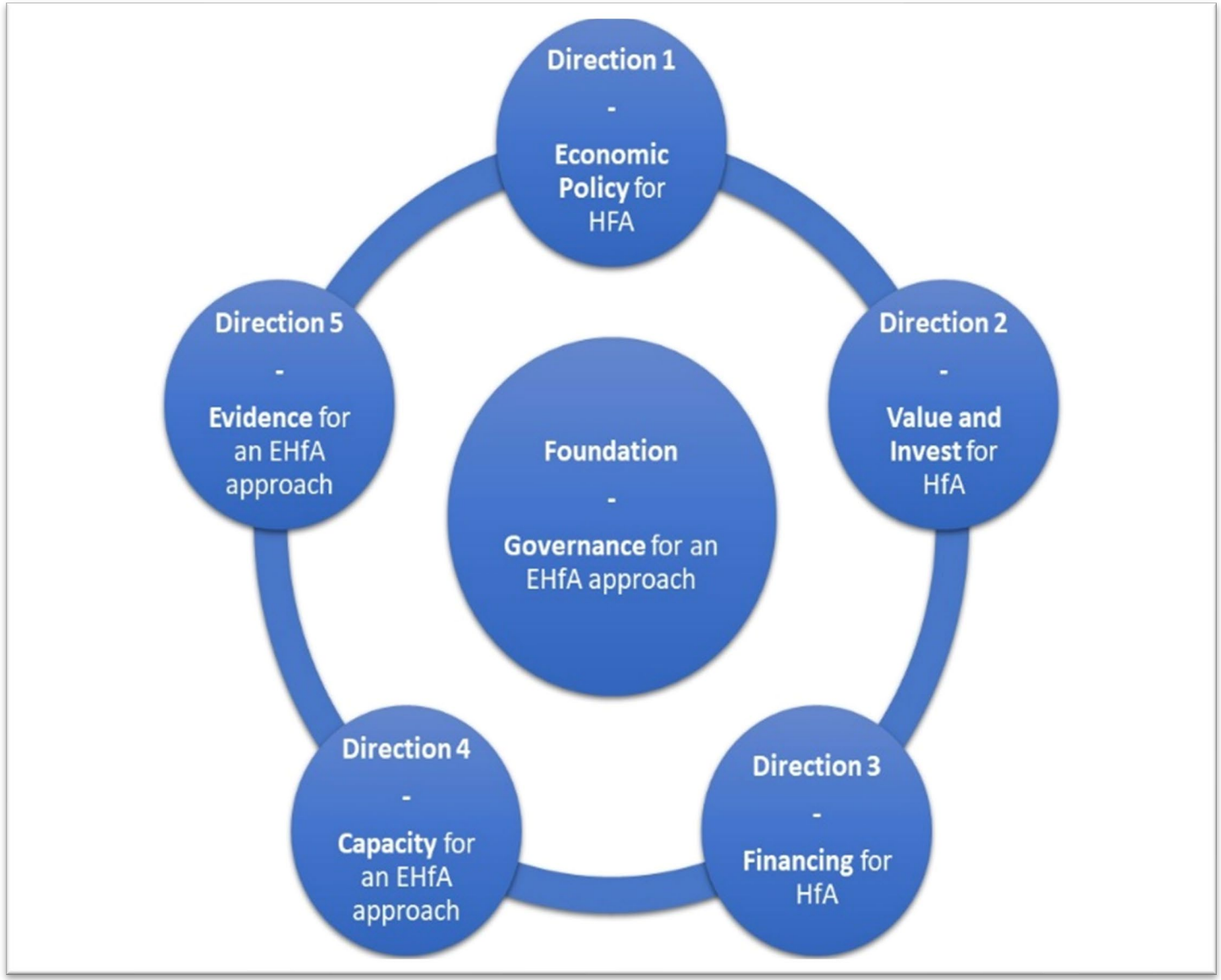
EHFA envisions the economy as **a people-centred system**, designed to advance and benefits from the **health of all**, **across generations**.

It recognizes that **health and health systems** are not merely costs to be contained but also **essential investments** for inclusive and resilient economies.

It calls for **aligning health and economic policies with the values of the populations they serve** and for **mobilizing public and private investment** toward building an equitable, healthy, and economically resilient future, for both current and future generations.

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Five strategic directions



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Comments received from

- European Commission
- Italy
- Republica Dominicana
- France

Support for central approach of EH4A

Importance of promoting an approach that **places health and well-being** at the heart of economic decisions and sustainable development policies.

Value the emphasis of the strategy on **intersectoral action**, recognising that fiscal, labour, commercial and social protection policies have a direct impact on the determinants of health.

Importance of strengthening **sustainable financing for health**, including the mobilisation of domestic resources, efficiency in public spending and the alignment of investments with the objectives of health and well-being of the population.

Strengthening of institutional and technical capacities, particularly in the field of health economics, as well as the development of information and evidence systems that allow better orientation of public policies.

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Support for central approach

Supports the ambition to place health and well-being at the heart of economic decisions, in line with a “**health in all policies”** approach, social participation, equity, gender equality, and a solid evidence base.

Vision is consistent with the **“well-being economies”** approach, which aims to anchor economic policies in community values, social justice, and environmental sustainability. It emphasizes the need to:

- Consider health spending and investments not as a cost to be contained, but **as a lever for prosperity**
- **Align economic policies with the values of the population** (equity, sustainability, inclusion)
- Prioritize **interconnected outcomes**: improved health indicators, reduced inequalities, sustainable development.
- Support the focus on **equity and gender equality**, as well as the promotion of care work, including informal care, and the protection of populations exposed to harmful commercial practices.

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Suggestions on implementation

Strengthen capacities for analyzing and evaluating the links between health and the economy, in order to convince non-health sectors of the importance of taking health into account in order to improve public policy outcomes;

- Develop **operational economic tools**, including dashboards for monitoring investments and health outcomes;

- Integrate **health impact assessments** into fiscal, industrial, and social policies;

- Improve the **transparency of investment decisions** and prevent conflicts of interest.

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Alignment with other sectors

WHO document **national governance arrangements** that facilitate implementation of the strategy, drawing on international experience.

In certain contexts, **joint leadership between the strategic level** (e.g., the Prime Minister) and the Ministry of Health may be appropriate to ensure interministerial coordination while mobilizing the necessary health expertise.

Avoiding duplication of reference frameworks is essential to ensure the clarity of international action and facilitate implementation by Member States.

The importance of ensuring consistency between existing frameworks, particularly with the work of the Pact for the Future, that relating to the measurement of well-being, the social and solidarity economy, and social protection, as well as with the statistical instruments developed by the OECD and international financial institutions. Avoiding duplication of reference frameworks is essential to ensure the clarity of international action and facilitate implementation by Member States.

The need to ensure (i) transparency of the process and (ii) consistency with existing WHO governance frameworks, in particular FENSA.

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A menu of options

It would be useful to frame actions in the strategy as a **menu of options** for Member States to consider, as appropriate, adapted to their contexts, respecting their competences and international rules. When referring to documents or outcomes of processes, we kindly request that references accurately depict Member State positions (e.g., adding “as appropriate” when referring to the quoted UNGA process). We further suggest not to reference documents which are under preparation/discussion.

Gradual implementation, adapted to the capacities of States, and encourages the WHO to provide operational methodological support (ex ante/ex post assessment tools, health/equity impact studies, steering dashboards that limit the reporting burden and build on existing frameworks—OECD/UN/WHO—to avoid duplication).

Terminology

Avoid terminology that is not universally accepted or that can lead to confusion. This includes references (such as **shifts in economic systems**) that could be understood as impinging upon rights, freedoms or principles enshrined in EU law.

Cannot support language implying a blanket limitation of "industry participation" in policy-making, especially when linked to an undefined category such as "**health-harming products**". We favour a whole-of-society approach that mobilises all relevant stakeholders, including the private sector (as also stated in WHA77.13).

Highlight that the concept of "**commercial determinants** of health" is currently being worked on.

In the absence, at this stage, of an agreed and consensual definition, recommended to avoid the use of this concept.

Deletion of language is not consistent with the agreed language of the UNGA Political Declaration on NCDs and mental health, adopted in December 2025 and not present in resolution WHA77.13.

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Suggestion edits

- No alternations to the substance of the actions
- Text to be clear that this is a menu of options at the start and operates within internation rules and agreements, and governance arrangements.
  - ‘Actions outlined in this strategy are intended as a menu of indicative options for Member States to consider, respecting international rules and governance, in accordance with their respective needs and in line with their national priorities, capacities and contexts’
  - Language changed from ‘Ensure’ to ‘ Foster’ and ’Enable’

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Suggestion edits (Language)

- Focus on economic policy not systems, and mention economic growth
  - ‘Economic policies that support long-term growth and competitiveness are central to povery reduction and the sustainable financing of health systems’
- We remove references to both the Lancet paper and upcoming report on commercial determinants
- Remove term ‘commercial determinants', (but retain the text that describes commercial and industrial policy as area of action)
- We refer to products that could negatively impact health, consistent with language in NCD declaration
  - Address key social, economic and environmental determinants of noncommunicable diseases and mental health and the impact of economic, commercial and market factors

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