



October 12, 2017

The Honorable Eric Hargan
Acting Secretary
U.S. Department of Health and Human Services
200 Independence Ave., SW
Washington, DC 20201

Dear Secretary Hargan:

We, the undersigned organizations, write to express our great concern over the Department of Health and Human Services' (HHS) participation in the World Health Organization's (WHO) "Roadmap" on non-communicable diseases (NCDs). Although this flawed policy blueprint has been portrayed merely as a non-binding statement of general principles, any expression of direct or indirect U.S. support for this scheme should be avoided. Otherwise, HHS will be effectively giving our nation's blessing to tax increases that harm working families, enlarge government bureaucracies, and diminish economic freedom in the U.S. and around the world. American taxpayers who fund WHO would be appalled that their tax dollars are being used to advocate for higher taxes from an unaccountable international body.

All of the signatories to this letter have, either individually or collectively, previously expressed alarm over multinational bodies' recent attempts to impose global policies or one-size-fits-all "guidelines" that are aimed at stamping out beneficial competition among nations' tax policies. For instance, three years ago a statement signed by dozens of free-market organizations around the world noted that, "Global Governance, the way in which nations interact for the common good, should exist solely to facilitate a free market economy, not to impose restrictions that disrupt the welfare of the competitive global marketplace." Writing specifically about proposals at that time from WHO to increase excise taxes on sugary drinks, tobacco, and alcohol in order to concoct a global health slush fund, the signatories remarked that "this would represent a dangerous precedent, and such excise taxes could be easily extended to all other consumer products."

Three years later, little has changed with WHO's ambitions. To give just one example, paragraph 15 from the publicly available August 2017 draft of the Roadmap states:

Where needed, we will work on national investments cases for the prevention and control of NCDs, their risk factors and determinants, to create the fiscal space for action. Many countries will have to manage blends of innovative and traditional funding sources. Where appropriate, we will consider using interventions that have the capacity to generate revenues such as taxation of tobacco, alcohol, sugar-sweetened beverages as well as impact investment.

It is our understanding that the latest draft still contains troubling language that essentially supports tax-related “interventions.”

It is particularly galling to us that all of these machinations have already been taking place at the expense of U.S. taxpayers, who provide the single largest contribution (nearly 20 percent) to WHO’s \$2 billion annual budget. And while WHO has recently come under criticism for spending roughly one-tenth of that large sum on travel alone, ordinary Americans have been denied the simple right to attend WHO meetings where these tax-hike proposals have been devised.

Even as WHO claims to be a scientifically grounded organization, its statements in the Roadmap indicate willful ignorance of evidence arguing against harsh excise taxes, which are manifestly regressive, routinely fall short of revenue collection estimates, and are linked to criminal smuggling activities. A large body of research can be consulted on these topics including papers by the [Tax Foundation](#) and [National Taxpayers Union](#).

This Administration has publicly committed itself to rational cost-benefit analysis of federal rulemakings and policies across all areas of government, including taxation. The Administration has likewise stated its priority in tax policy to provide relief for middle-class and working class Americans, who by definition would be most adversely affected by WHO’s proposals. We hope you share our enthusiastic support for these approaches, and will consider it applicable to HHS’s interactions with WHO at this critical moment.

We therefore urge you to take the following actions:

- 1) Cancel HHS’s participation in the Roadmap proceedings that are expected to take place at WHO’s global conference on non-communicable diseases, slated for next week;
- 2) Publicly repudiate all portions of the Roadmap that overtly or implicitly support tax increases, multinational regulations, or other government-driven policies that undermine democratic fiscal policymaking among nations and economic rights among citizens; and,
- 3) Affirm that U.S. policy seeks, instead, to empower individuals, encourage private sector innovation, and foster voluntary cooperation among sovereign nations to meet global health challenges.

Thank you for your consideration of our views on this urgent matter.

Sincerely,

Pete Sepp, President
National Taxpayers Union

Tom Schatz, President
Council for Citizens Against Government Waste

David Williams, President
Taxpayers Protection Alliance