

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

Policy on Commercial Determinants of Health

Negative impact of commercial activities on health

European doctors recommend policymakers to:

- Prioritise public health¹ when making policies and ensure they make the healthy choice the easy choice
- Ensure that policy making is evidence based and ethical for the benefit of public health
- Maintain strict transparency and disclosure requirements for policymakers about their commercial interests and engagement with lobbyists
- Introduce health impact assessments when regulating new products or services
- Limit and regulate advertising particularly towards children and adolescents, and protect them from exposure to unhealthy products such as alcohol, tobacco and nicotine products, and food and drinks high in fat, salt and/or sugar
- Introduce effective measures to raise the price and decrease the accessibility of unhealthy products
- Raise requirements for product formulation and decrease the use of harmful ingredients or additives in products

¹ Public health is the science and art of preventing disease, prolonging life, and promoting health through the organized efforts of society (D. Acheson, 1988).

- Adopt binding and user-friendly health-related product labelling standards which are independent of industry, for example for alcohol and food
- Ensure that any nutrition, health, and green claims are clear, accurate and based on scientific evidence
- Implement incentives for commercial actors to produce products proven to be healthy by scientific evidence
- Regulate social media in view of its adverse effects on children and adolescents
- Regulate the gambling industry to protect health, to include age restrictions, a ban on advertising and an introduction of individual deposit levels for on-line gambling
- Introduce appropriate and necessary restrictions (cooling off period) on post-term employment and activities to avoid conflicts of interest and undue influence on public health decisions

European doctors recommend doctors to:

- Through their national medical associations, use their legitimacy and authority to encourage action on commercial determinants of health

1. Commercial activities impact health

While life expectancy has increased dramatically in Europe for the past 70 years, there are annually millions of lives lost to avoidable causes, such as the impact of unhealthy products, unhealthy working conditions and environmental degradation. These causes may partly be attributed to insufficiently or badly regulated industries and products.

Commercial determinants of health refer to the conditions, actions and omissions by commercial actors that affect health.² They are one of the key social determinants of health which are the non-medical factors that influence health outcomes, i.e. the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life.³

The causal link between certain products and services and negative health outcomes is undisputed. Four major commercial products – alcohol, tobacco, ultra-processed foods and beverages, and fossil fuels, cause an estimated 2.7 million premature deaths annually in the WHO European Region. This means 7400 deaths daily which is nearly one quarter of all deaths on average. The impact of commercial entities on peoples' lives is massive as they can also impact mental health, inequity, planetary damage, politics, and the global market.^{4 5 6} In addition there is growing evidence of the impact of social media platforms and gambling products on mental health and addiction.^{7 8} On the other hand, commercial entities support the development of modern healthcare and promote positive health outcomes through innovation and production of essential products and services.

Commercial actors also influence health policy, for example through lobbying, incentivising policymakers to align decisions with commercial agendas and preventing or weakening regulation of their products and services. For example, in 2017, instead of regulating alcohol labelling, the European Commission followed the industry's lobbying efforts and invited them to present a self-regulatory proposal, despite evidence showing that self-regulation has no benefits for public health.^{9 10} In 2021 as part of the Europe's Beating Cancer Plan, the Commission

² [Commercial determinants of health](#). The World Health Organisation (WHO), 2024.

³ [Social determinants of health](#). The World Health Organisation (WHO), 2024.

⁴ Bhugra, D. et al. [Commercial determinants of mental health](#). International Journal of Social Psychiatry, 2023.

⁵ [Commercial Determinants of Noncommunicable Diseases in the WHO European Region](#). World Health Organization (WHO), 2024.

⁶ Gilmore, A. et al. [Defining and conceptualising the commercial determinants of health](#). The Lancet, 2023.

⁷ Zenone M. et al. [The Social Media Industry as a Commercial Determinant of Health](#). International Journal of Health Policy and Management, 2023.

⁸ Wardle, H. et al. [The Lancet Public Health Commission on gambling](#). The Lancet Public Health, Vol 9, No 11, 2024

⁹ [Report from the Commission to the European Parliament and the Council regarding the mandatory labelling of the list of ingredients and the nutrition declaration of alcoholic beverages](#). The European Commission, 2017.

¹⁰ [Self-Regulation: a False Promise for Public Health?](#). European Public Health Alliance (EPHA), 2016.

announced to propose mandatory alcohol labelling.¹¹ The proposal is still pending. In 2022, tobacco industry spent almost €20 million to influence EU policymakers. Additionally, in 2023, the European Ombudsman found lack of transparency in the Commission meetings with tobacco lobbyists.¹² ¹³ Long before this, the tobacco industry tried to prevent the whole Tobacco Products Directive from coming into force and being revised.¹⁴ ¹⁵ As a national level example, it was revealed in 2024 that experts on the UK government's advisory panel on nutrition have links to the food industry.¹⁶

In addition to lobbying, corporate influence is exerted through marketing – enhancing the desirability and acceptability of unhealthy products; corporate social responsibility strategies – deflecting attention and whitewashing stained reputations; and extensive supply chains – amplifying company influence around the world.¹⁷

Besides harmful products influencing health and wellbeing adversely, certain practices of commercial actors may directly and indirectly harm human and planetary health as well as health equity. These practices are for example the lack of fair pay and safe working conditions, tax avoidance, or the use of intellectual property protections to block access to medicines or vaccines.¹⁸ Moreover, commercial actors are often pushing unnecessary products and overconsumption. This generates greenhouse gas emissions and fosters climate change.

Commercial determinants of health affect everyone, but young people are especially at risk of being influenced by advertisements and celebrity promotion. Social media platforms have enabled health-harming industries to create new mechanisms for directly engaging youth in their marketing activities.¹⁹ Furthermore, the products and actions of the social media industry are associated with mental health concerns and contain addictive features.²⁰

The business model of commercial gambling relies on a small percentage of consumers who generate the majority of industry profits. Harms from problem gambling not only affect individuals but also affect families including financial destitution, family break-up and risk of domestic violence.²¹

¹¹ [Europe's Beating Cancer Plan](#). European Commission, 2021.

¹² [Declared Tobacco Industry Presence in the EU Policy-Making Environment](#). Smoke Free Partnership (SFP), 2023.

¹³ [Decision on the European Commission's interactions with interest representatives of the tobacco industry](#). The European Ombudsman, 2023.

¹⁴ Mandal S. et al. [Block, amend, delay: Tobacco industry efforts to influence the European Union's Tobacco Products Directive](#). Smoke Free Partnership (SFP), 2009.

¹⁵ Peeters, S. et al. [The revision of the 2014 European tobacco products directive: an analysis of the tobacco industry's attempts to 'break the health silo'](#). BMJ Tobacco Control, 2016.

¹⁶ Borland, S. [UK government's nutrition advisers are paid by world's largest food companies, BMJ analysis reveals](#). The BMJ, 2024.

¹⁷ Kickbusch I. et al. [The commercial determinants of health](#). The Lancet, 2016.

¹⁸ [Insights and evidence from The Lancet Series on commercial determinants of health](#). The Lancet, 2023.

¹⁹ Pitt, H. et al. [Children, young people and the Commercial Determinants of Health](#). Health Promotion International, 2024.

²⁰ Zenone M. et al. [The Social Media Industry as a Commercial Determinant of Health](#). International Journal of Health Policy and Management, 2023.

²¹ Wardle, H. et al. [The Lancet Public Health Commission on gambling](#). The Lancet Public Health, Vol 9, No 11, 2024

Health harms are escalating due to commercial determinants of health, which increases healthcare system's challenges to cope. Moreover, communities and governments are often the ones paying the costs of health harming practices such as healthcare or environmental cleanup. These costs reduce the resources to hold commercial actors to account while they make excess profits and use their growing wealth and power to shape political and economic systems in their interests.²² Finally, healthcare costs are unaffordable for many people in Europe, and out-of-pocket payments lead to financial hardship and unmet need and are most likely to affect the poorest households.²³

2. Good regulation matters

Governments shape regulatory systems and there are policy solutions to tackle the commercial determinants of health, such as raising the price, decreasing the availability, and regulating advertising of harmful goods. Unfortunately, they are often not sufficiently implemented. Regulation can be an effective public health measure, and new policies, laws, and systems should set higher standards for commercial actors. This way, their products and practices could contribute more positively to health, wellbeing, equity and sustainability. Also, commercial actors should prioritise environmental issues, social issues, and corporate governance (ESG) when making investment decisions, including considerations of health impacts.

Taxation, notably indirect taxation such as value added tax (VAT) and excise duties, can play a key role in creating incentives or disincentives²⁴ for consumers. Moreover, taxes like "sugar tax" on beverages help generate income for national budgets that could be invested in public services. Similarly, taxation of alcohol, tobacco and fossil fuels generate income while disincentivising consumption.

Policy-makers need to be transparent regarding their contacts with stakeholders and consider scientific evidence from objective and ethical research when introducing new legislation. Also, trade agreements must protect, promote and prioritise public health over commercial interests.²⁵ However, policymakers first need to recognise the scale of the problem and the broad impact that commercial practices have on health. Public health and wellbeing must be prioritised in government policy decisions.

²² [Insights and evidence from The Lancet Series on commercial determinants of health](#). The Lancet, 2023.

²³ [Can people afford to pay for health care? Evidence on financial protection in 40 countries in Europe](#). World Health Organization (WHO), 2023.

²⁴ [Mapping of pricing policies and fiscal measures applied to food, non-alcoholic and alcoholic beverages](#). European Health and Digital Executive Agency, 2022.

²⁵ [Statement on Trade Agreements and Public Health](#). The World Medical Association (WMA), 2021.

In Europe, there are success stories despite strong industry opposition. For example, Ireland, with support of doctors, managed to ban smoking in workplaces, bars and restaurants as the first country in the world. In Estonia, a coalition of health partners, including doctors and other healthcare professionals, helped advance legislation for taxation on sugar-sweetened beverages. In Slovenia, mobilisation of civil society organisations helped ensure the passage of tobacco legislation.²⁶ Belgium recently introduced a €200-a-week deposit cap for online gambling accounts which can only be increased after customer safety checks.²⁷ At EU level, a regulation was adopted to set a maximum limit of trans fat in food.^{28 29}

The European internal market provides great opportunities for harnessing the positive effects on health from commercial activity while limiting the adverse effects. By utilising these opportunities and harmonising regulatory and taxation approaches in the European Economic Area (EEA), health benefits may be made. Conversely, by failing to regulate commercial activity at the European level, adverse health outcomes may be promoted. Policy makers need to take this into account at the European, national, regional and local levels.

Effective policies and regulations can be drafted and implemented but it requires coordinated efforts, political will and courage, involving governments, civil society, and international organisations. Government regulation, civil society mobilisation, international frameworks, compliance mechanisms for commercial entities, progressive economic models, and regenerative business models that incorporate health, social, and environmental goals, all together are part of the solution.³⁰ Also doctors and other healthcare professionals must work together to demand and propose new policies and systems as well as an increased attention to the link between industry, their products and health outcomes for citizens.

²⁶ [Commercial Determinants of Noncommunicable Diseases in the WHO European Region](#). World Health Organization (WHO), 2024.

²⁷ [The Gaming Commission protects the players](#). The Gaming Commission Belgium, 2024.

²⁸ [Commission Regulation \(EU\) 2019/649 amending Annex III to Regulation \(EC\) No 1925/2006 of the European Parliament and of the Council as regards trans fat, other than trans fat naturally occurring in fat of animal origin](#). European Commission, 2019.

²⁹ [CPME Policy on Trans Fats](#). Standing Committee of European Doctors (CPME), 2018.

³⁰ Friel, S. et al. [Commercial determinants of health: future directions](#). The Lancet, 2023.