



MOVENDI
INTERNATIONAL

UNCORKING BIG ALCOHOL IN THE EU



A mapping of the European alcohol industry and
its lobbying efforts against public health in the EU
institutions

TABLE OF CONTENTS

Introduction	2
1. Mapping the Alcohol Industry	3
Alcohol Companies	3
Trade Organisations	3
Social Aspect Organisations	4
How Big Alcohol is interconnected	5
2. The Alcohol Industry lobbying in the EU in numbers	7
Method	8
Numbers of meetings held with the EU Commission	9
Resources spent on EU Lobbying	11
Number of lobbyists working with EU lobbying	12
3. The Lobbying Practices of Big Alcohol	14
Background	14
Practical Strategies	15
Discursive strategies	16
Conclusion	20
References	22

Report written and published by IOGT-NTO and Movendi International

INTRODUCTION

Big Alcohol has for decades had a large presence in the EU institutions with one single aim – to strengthen their own profits, often at the cost of policy that would protect people and communities. While Big Tobacco has for a long time been scrutinized and largely excluded from policy, Big Alcohol, with similar goals and tactics, has remained in the corridors in Brussels. But what is Big Alcohol and how are they organised? This report, written by IOGT-NTO, maps the actors and practices of Big Alcohol in the European sphere. This report aims to describe who they are, what their lobbying looks like in numbers, and how they operate.

The first part of the report describes the different kinds of alcohol industry lobby organisations that are active on the EU-level. The second part describes, in numbers, the activity of the industry in Brussels. It describes the number of meetings industry has held with high-level EU officials in the EU Commission, the extensive resources spent on lobbying by the industry as well as the number of people they employ to lobby EU policy. The final part of the report goes more into depth on how the alcohol industry, at every opportunity, tries to undermine the importance of public health policy in attempts to protect their profits.

What this report shows is how a global multibillion-dollar industry that is producing harmful products uses their economic power and all available means to influence policy. As the report shows, this is done not only at the EU-level, but in relation to the public health policies of individual member states as well.

In a European Union that is meant to be built on democratic principles, make evidence-based policy and keep the interest of its citizens at heart, it is deeply concerning that harmful industries, that do not act for the good of the people, still can have a decisive influence on policy. This is a serious democratic issue — public health policy, and especially alcohol policy, should aim to protect the health of the people, not the profits of harmful industries.

1. MAPPING THE ALCOHOL INDUSTRY

To understand the alcohol industry in the EU, it is important to understand the many different shapes Big Alcohol appears in, what different roles they play and how they interconnect. While there of course is a whole range of different organisations connected to the alcohol industry involved in European alcohol policy, it is possible to divide them into three different general groups.

1. Alcohol Companies

There are many larger alcohol companies in the EU that are trying to influence policy outcomes. These companies are usually quite straightforward in the way that they directly represent the own interest of their company. However, to be able to directly lobby on the European arena these companies need two key attributes. Influence and resources.

Influence in this sense means that the company in question is a central player in the market it is active in. Furthermore, the companies also need to be able to afford the costs of a structure to achieve successful lobbying, such as hiring personnel and starting an office – a project only a selected few have the financial capabilities of pursuing. Therefore, direct company lobbying over time is usually limited to the largest alcohol companies in Europe such as Pernod Ricard, Heineken, Diageo and Carlsberg. For example, Pernod Ricard, the second largest alcohol company in the world, has more than 3 full time employees working solely on EU lobbying.

While this might be effective for some companies that possess huge market shares, for medium sized businesses it is not optimal. For them the next option is more common.

2. Trade organisations

Trade organisations are usually large umbrella organisations of companies that represent a specific sector or interest. Instead of having 50 different brewers lobbying for the same policy, they can instead streamline it through an organisation that works full time with EU influence and lobbying, and letting them represent their opinions.

In the alcohol sector, while there are several different trade organisations, there are three that are the most prominent: The Brewers of Europe, SpiritsEUROPE and CEEV (Committee of Wine producers), each representing their type of beverage. Their members range from larger multinational giants, such as Heineken, to national interest organisations as well as smaller individual alcohol producers.

These organisations are usually the most visible in the Brussels bubble, often being the face of the industry. With their many members they have both a lot of resources and power. For example, SpiritsEUROPE had 65 high level meetings with the EU Commission over a 8-year period,[1] which is significantly more than any spirits company have by themselves.

3. Social Aspect Organisations

While companies and trade organisations are the most common organisations when lobbying is discussed, a third group is also prevalent in the European discourse. This group is not as clearly defined since it is using a more indirect approach to influence – the so-called social aspect organisations.

Social aspect organisations rarely do direct lobbying, but rather focus on indirect lobbying efforts, often either by producing research studies that confirm the agenda and arguments the industry wants to convey or by engaging in corporate social responsibility (CSR) activities.

An issue with the Social Aspect Organisations is that their influence is harder to track since they rarely are directly involved in policy, and are therefore not a part of the transparency register or other direct lobbying activities.

While being directly funded by key trade organisations, many try to describe themselves as “research institutes” in attempts to gain legitimacy for their findings. Two examples are Wine in Moderation (funded by the Committee for Wine Producers) and Beer and Health (funded by The Brewers of Europe).

How Big Alcohol is interconnected

In Figure 1, it is shown how the different organisations relate and interact with each other. At the top of the figure we have the wider umbrella interest organisations that often gather both companies as well as national alcohol companies and trade organisations, on the second step is the multinational corporations that uphold their own independent lobby apparatus. It is worth noting that many of the larger corporations are also umbrella companies in themselves (for example Pernod Ricard owns several national brands of wine and spirits).

The social aspect organisations are in red, it is worth noting that the spirits sector does not have an equally distinctive social aspect organisation as the other sectors on the European level, but rather act through larger social aspect organisations, for example the organisation “International Alliance for Responsible Drinking (IARD)”.

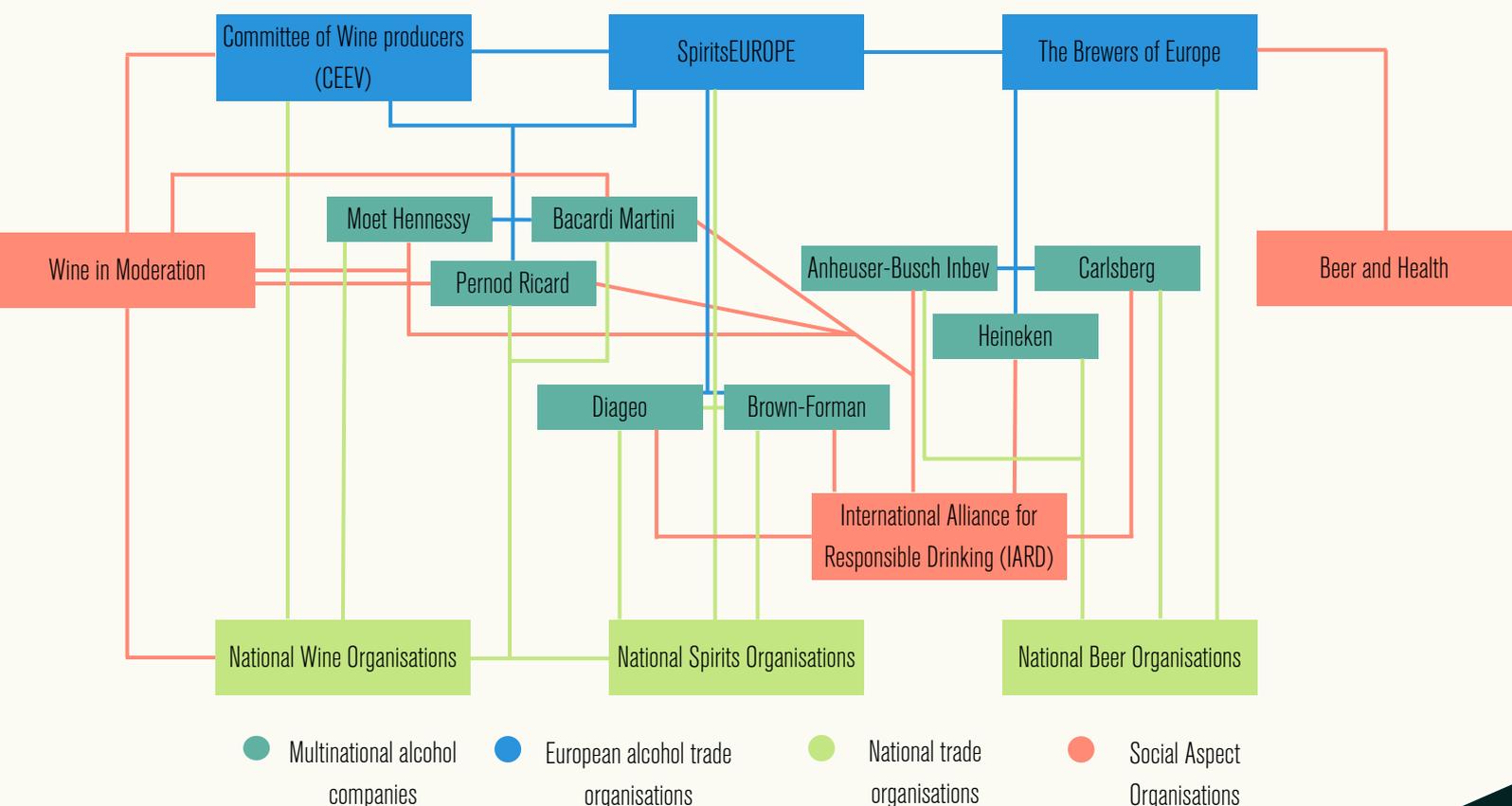


Figure 1 - Diagram on how Big Alcohol in the EU is organised and connected

Finally, in the bottom of the figure is the national trade organisations that are usually national umbrella organisations for national breweries, wine producers and spirit producers. It is also common that larger alcohol brands also hold a seat in these organisations. Carlsberg, for example, are members of the “Danish Brewers Association”.[2] While many of the national associations mainly act on the national level, some of them are also lobbying independently on the EU level. The Danish Brewers Association, for example, spent around 200 000 -300 000 euro on EU lobbying in 2019. [3]

With the different lines present in the figure, we can see how many organisations and companies are working cross-sectionally. For example, spirits, beer and wine companies are all active in IARD. Further, Pernod Ricard as a company is a member of both SpiritsEurope as well as CEEV. Pernod Ricard is also a member of, for example, “The Spirit and Wine Suppliers Association”, a Swedish spirits and wine trade organisation. [4]

This means that many multinational corporations have the ability to both affect EU policy by their own representation, representation through a relevant trade organisation, and by representation on the national level in national organisations, leading to several different channels of influence.

2. THE ALCOHOL INDUSTRY LOBBYING IN THE EU IN NUMBERS

It is always hard to measure impact or influence in policy, in the end it usually boils down to being able to talk with the right person at the right moment. This means that we can never with certainty know who has the largest influence in EU alcohol policy. It is, however, possible to determine important prerequisites that make influence possible. This article will focus on three central prerequisites:

1. **Participation:** While the outcome of a meeting is hard to determine, it is reasonable to assume that the more meetings one manages to arrange or participate in increases one's opportunity to influence policy processes.
2. **Financial capability:** Another central prerequisite is to have the financial capability to employ lobbyists, produce material and arrange events and other activities to raise questions or get in contact with decision-makers.
3. **Lobby presence:** A final prerequisite to affect policy is being able to be where the policy happens. In the EU this usually means being able to have personnel in Brussels that actively monitor and participate in consultations, meetings, and other advocacy activities.

This chapter will present and discuss participation, financial capabilities and lobby presence for the alcohol industry in the EU. The report will also look at Non-governmental Organisations (NGO:s): that work with european alcohol policy. This is to be able to compare how large the industry lobbying, that focus on economic profit, is estimated to be in comparison to NGO:s that work with the prevention of alcohol-related harm and strengthening public health.

To operationalize, the study will here compare:

1. Number of meetings with the European Commission (participation)
2. Estimated yearly budget spent on EU lobbying (financial capability)
3. Estimated number of personnel working with EU lobbying (Lobby presence).

Method

The data for the study is taken from the EU Transparency Register. While the information published is often estimations done by the companies or organisations themselves, it is still the best available tool to study the amount spent by different actors.

The number of EU Commission meetings only relates to high levels meetings with either a Commissioner or with their cabinet, lower levels of meetings with the EU Commission are not documented. Money spent is what the organisation itself estimates that they spend on lobbying each year. This sum is expected to be lower than the actual number spent, but still offers a way to compare different actors. It is worth noting that since 2020, non-governmental organisations are not obliged to register their money spent. Therefore, this number will not get compared.

Finally, the amount of personnel is reported by the organisations or companies themselves and is calculated by Full time equivalent (FTE). For example, three full time employees would give a value of 3 FTE, while three half-time employees would give a value of 1.5 FTE.

The data was collected in October and November 2022. While some organisations have newer data reported than others this is not expected to greatly affect the result since the study assumes that no drastic changes in presence and money spent have taken place during this time.

The data also only focuses on organisations and companies that directly work with questions concerning alcohol policy. Therefore, lobbying done by even larger trade associations such as Food and Drink Europe as well as larger public health organisations is omitted. This has been done to be able to isolate meetings and lobbying efforts that are strictly related to alcohol policy.

Numbers of meetings held with the EU Commission (Participation)

When measuring high-level meetings with the EU Commission it is possible to observe a large discrepancy between NGOs and the alcohol industry. The alcohol industry had 270 meetings over the last six years compared to the NGOs' who had 14 meetings, this means that of all the meetings held regarding direct alcohol issues, 95 % represented economic interests while 5 % represented public health interests.

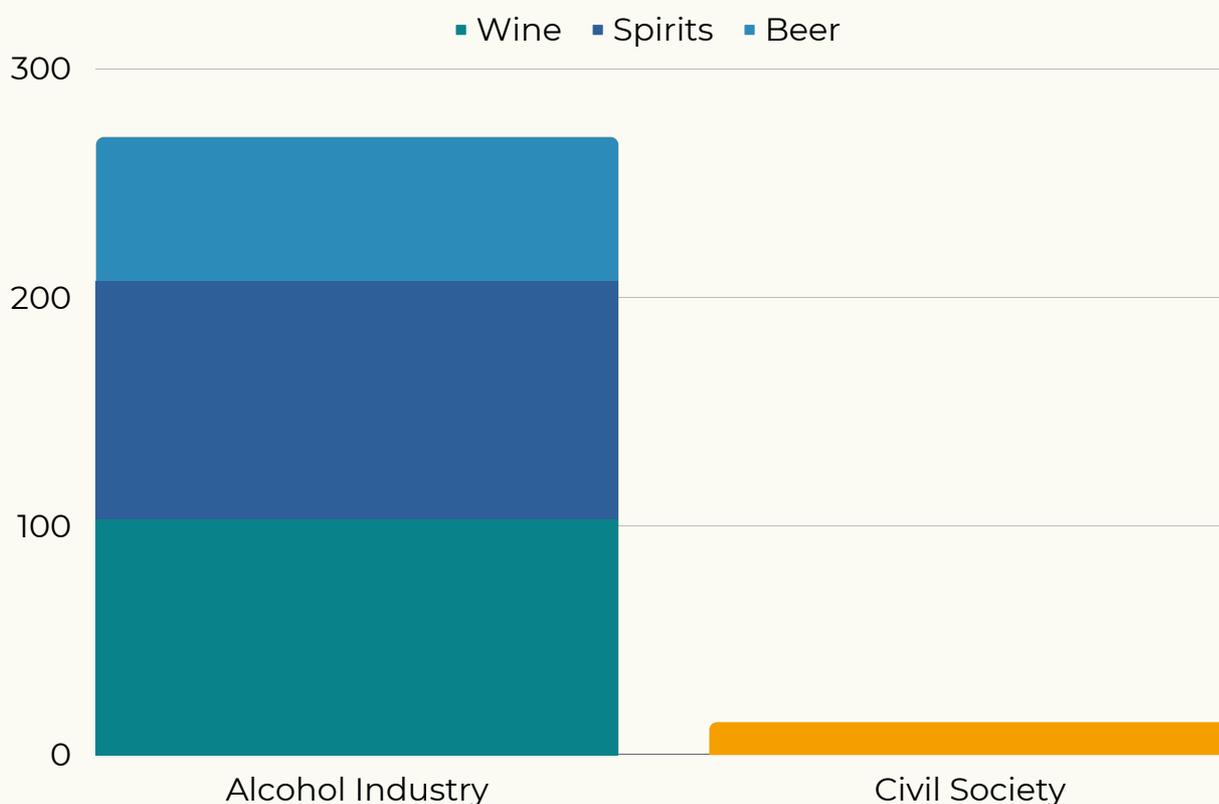


Figure 2 - Top levels meetings held with the European Commission 2014-2022, total

Figure 3 shows the number of meetings broken down to the actors with the most meetings. On the NGO side it is observable that almost all (71 %) meetings on alcohol policy have been held by the European Alcohol Policy Alliance (Eurocare).

On the industry side we can see that SpiritsEurope is the most dominant association by far when it comes to top meetings arranged with the EU Commission. SpiritsEurope alone has participated in four times as many meetings with the executive branch of the EU commission as the NGO:s have combined.

Further notable in the Beer sector is that several of the largest companies participated in more meetings themselves than their interest organisation, The Brewers of Europe. This indicates that many single beer companies possess a large lobbying presence and influence on their own.

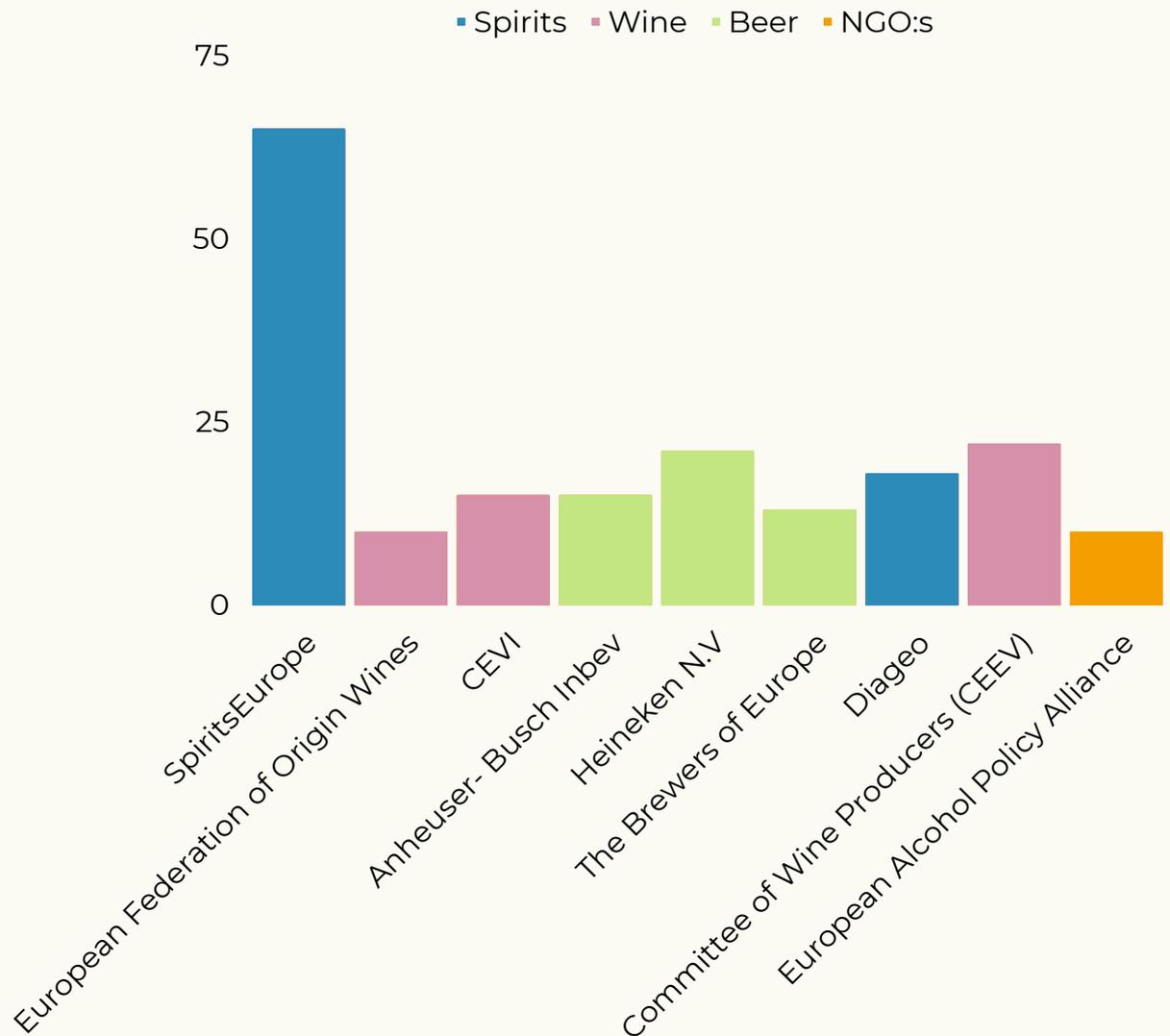


Figure 3 - Top-levels meetings held with the EU-Commission 2014-2022, largest actors per organisation type only

It is worth noting that there likely is an overlap where some actors, for example The Brewers of Europe and SpiritsEurope, have participated in the same meeting, which here is counted as two meetings. While this makes it harder to determine the exact gap, it is not expected to affect the general trend in itself.

Resources spent on EU lobbying (Financial Capability)

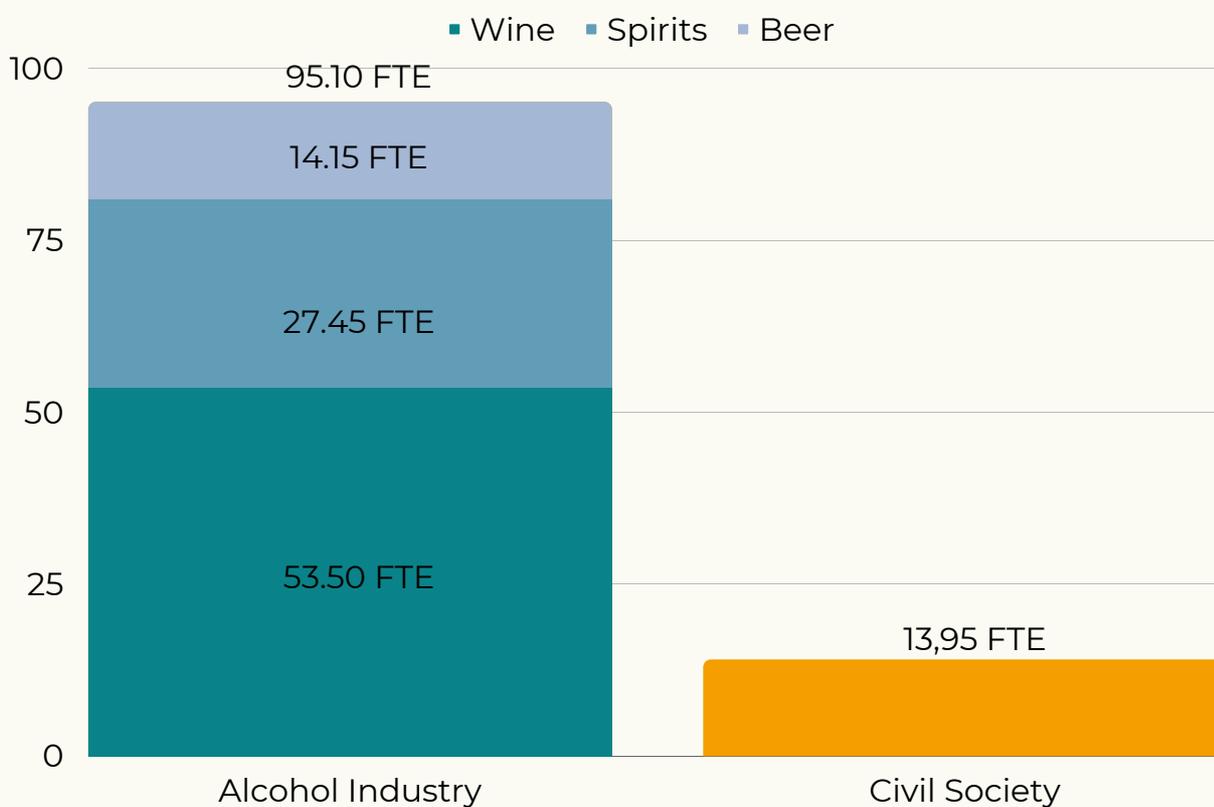
When looking at money spent, it is observable that the alcohol industry estimates themselves to spend around 9 million euro on EU lobbying every year. Further noticeable is that the wine industry spends by far the most compared to the other alcohol sectors. This is partly explained with the fact that there are more wine actors in general compared to, for example, the spirits industry. Since 2020 NGOs does not need to declare their lobbying costs, which therefore makes it difficult to compare the lobbying costs. However, looking at earlier data before 2020 indicates that NGOs has a significant lesser spending compared to the alcohol industry.



Number of lobbyists working with EU lobbying (Lobby presence)

Finally, we will look at the number of lobbyists the different sectors employ in the EU. The pattern is here similar to the number of meetings. The alcohol industry is once again dominant compared to the NGO counterparts in the EU Transparency register in line with the trend that was observable with regard to financing.

The wine sector employs the most lobbyists in the EU. Noteworthy is that the beer sector has quite few lobbyists compared to its counterparts, this could indicate that the budget of the beer industry is more focused on other activities than employment compared to the other sectors. The results also indicate that NGOs spend marginally more on employment in relation to other activities compared to the alcohol industry, but this difference is rather small and hard to draw any conclusions from.



What can be concluded in this chapter is that there is a large gap in prerequisites for policy impact between the alcohol industry and NGOs in the EU influence sphere. It can be seen in financial capabilities, in the amount of personnel being able to work with EU policy, as well as in outcome when it comes to actual high-level meetings organised with important decision-makers. It is hard to know exactly how this translates into actual influence, but it is obvious that having access, money and engaged personnel helps to influence policy.

It is important that policy makers at the EU level are aware of this large discrepancy, both in general, but also specifically in the alcohol field since it is likely to, both consciously and unconsciously, distort policy towards a profit-centred approach. Here it is important that both the EU Commission, Member state representatives and Members of the European Parliament (MEP) are aware and actively try to balance their engagement with lobbyists to ensure that money is not the only factor that talks.

But how does the alcohol industry more directly affect policy? In the next chapter, as a small case study, the paper will present how the alcohol industry has tried to influence a specific policy proposal from an EU Member State, namely the Irish proposal of introducing health warnings on alcoholic products.

3. THE LOBBYING PRACTICES OF BIG ALCOHOL - A CASE STUDY OF THE IRISH PUBLIC HEALTH ACT

In this final chapter, the report aims to explain what the alcohol industry is doing in Brussels, what messages they are trying to convey and how they, in practice, dilute, and undermine public health policy in the EU.

To exemplify, this study will describe the actions of Big Alcohol in Brussels to undermine the public health act of Ireland and especially Ireland's proposal to introduce health warnings on alcoholic beverages.

Background

In 2016, Ireland informed the European Commission of its intention to introduce health warnings on alcoholic beverages, such as cancer warnings. For Ireland, this was seen as an important step in raising awareness among its population on the negative effect alcohol has on health. While the negative health effects of alcohol have for a long time been clear, many of the dangers of alcohol are still unknown to the public. This increases alcohol-related harm and makes it harder for citizens to make informed choices when it comes to alcohol consumption and how alcohol affects their health.

Since Ireland's proposal involved products that are part of the Single Market, it needed to be commented on by the European Commission. This is a standard practice to ensure that the proposal is aligned with current EU regulations and Treaties.

The Irish proposal has been discussed on the EU level at three different occasions (in 2016, 2018 and 2022) and each time it has been met by an extensive lobbying campaign from the alcohol industry to try and undermine the proposal with the goal of making the Commission oppose the proposal in its entirety. As of writing, the proposal is still awaiting final approval from the Commission.

To understand why these lobby efforts are taking place, there are a number of things one needs to know.

Firstly, with the importance of the European markets for the alcohol industry it comes as no surprise that the EU has become a central arena for the industry's lobby efforts. Secondly, there is discursive power in the issue of alcohol health warnings, as it sets the scene for how alcohol ought to be regarded as a product. The main strategy for the alcohol industry, together with other unhealthy industries, is to avoid any framing or discussions in which their products are seen as harmful or dangerous. Health warnings is, in many ways, the exact opposite to that, clearly communicating the harm and diseases alcohol is a direct cause to.

According to many scholars, the alcohol industry is in a very similar spot as Big Tobacco were 40 years ago when the perception of tobacco changed and the effects of smoking started to become clear for the general public. During the last three decades, the public perception of the tobacco industry has become increasingly negative, and many policies have been introduced to both reduce tobacco use as well as limit the impact of the tobacco industry, in Europe as well as globally.

The remainder of this chapter will be aimed at outlining the lobbying strategies used by the industry, focusing on their lobby efforts on EU-level throughout the policy process surrounding the Irish proposal on health warnings on alcohol.

Practical strategies – Taking up space in the debate, setting the agenda

A number of strategies are used by the alcohol industry in their efforts to undermine any effort to implement effective and evidence-based alcohol policy. These strategies are both practical and discursive. To start with the practical strategies employed in the case of the Irish proposal, the industry has been making sure to take up as much space as possible in the policy debate, and trying to set the agenda. The industry has been very active in holding meetings with any actors on EU-level. This includes European Commissioners and their cabinets, MEPs, Permanent EU-representations of Member States, amongst others.

The fact that the industry gets involved in the policy process concerning a public health proposal, where they inherently have a conflict of interest and cannot provide unbiased insight, is in itself paradoxical. But for the industry it serves a clear agenda-setting function, namely in making it into *more* than merely a public health proposal; making it about them, about trade, agriculture and the “cultural value” of their products. This is further shown by the fact that those EU-officials they have been taking meetings with have not come from the public health side, but rather from other fields such as agriculture or competition. A recent example is that several organisations from the industry, including Diageo, took meetings with the cabinet of the Commissioner of Agriculture instantly when the Irish proposal returned to the EU-level , even if the agricultural commissioner has nothing to do with the Irish proposal.

Aside from holding meetings on EU-level, many actors from the alcohol industry have also been active in the policy process through leaving written positions, participated in expert groups and lobbied on the national level to sway the Commission opinion into opposition versus Ireland.

Discursive strategies – Denial, distortion, distraction, distinction

There have been multiple studies done globally on alcohol, health harm and what methods the alcohol industry uses to push their agenda. One of the most prominent works was on the alcohol industry’s ways of relating to the link between alcohol and cancer. It was done as a broad qualitative study of 27 different organisations, conducted by Pettigrew et al. [5] In the article the authors categorized three overall strategies that were used globally by the alcohol industry in their lobby efforts around the link between alcohol and cancer.

- *Denial*: Arguing that there is no clear casual connection, or that there is not enough evidence to say that there is.
- *Distortion*: Acknowledge part of the casual relationship but misrepresent the nature and size of it.
- *Distraction*: Empathize other risk factors as more important.[6]

These three strategies can be seen in the industry's lobby efforts on the Irish proposal as well, both in relation to the parts that concern cancer, as well as the proposal more broadly. The following section will outline the ways in which these three strategies have been employed throughout the policy process. To end this chapter, a fourth and very well-employed strategy will be discussed, which for the sake of this paper will be referred to as "*distinction*". This is about the way in which the industry is working to maintain a distinction in the way alcohol is regarded compared to other products, which is mainly done through highlighting the cultural history of alcohol in Europe.

Denial – Questioning evidence, spurring doubt

It is important to note that in relation to pro-alcohol lobbying, the strategies employed by the industry are often subtle and rhetorically mild. This is because a more direct "pro-alcohol" agenda, with hard denial of the harmful effects of alcohol would not work. If the industry were to completely deny the negative health and social effects of alcohol, this would negatively affect their legitimacy. Instead, the industry applies soft tactics of denial, such as spurring doubt, questioning existing research, or using language that makes alcohol consumption out to be an unquestioned and unquestionable norm.

In addition to that, a common tactic employed by the industry is to claim to support presented public health goals, but disagree with any policy proposals presented to achieve these goals. In the case of the Irish proposal, one example of this is that certain actors from the industry claimed to welcome the aim of the proposal while at the same time being opposed the proposal in itself, often by trying to question the science behind it even when it is from well-established sources such as the World Health Organisation.

Distortion– The argument of disproportionality

While we today know that alcohol causes over 1 million deaths annually in the European region[7] and that alcohol is the cause to over 200 diseases, among them 7 different kinds of cancer, [8]

Big Alcohol often attempts to downplay the detrimental impact alcohol has on citizens' health. This denial is seen in the discussions on the Irish proposal, with several industry actors arguing that the action presented are “disproportionate” to the harm alcohol does. This is often combined with the wrongful claim that lower levels of alcohol consumption are harmless even if the evidence is clear that for example, the risk for alcohol-related cancer, increases even at low levels of consumption.

This line of argument from the industry is a form of self-regulatory effort aimed at maintaining legitimacy and place the responsibility on the individual, instead of the product which is actually causing the harm. Through doing so the industry also works rhetorically to counter any wider policy action to reduce alcohol consumption, such as excise tax on alcohol or, as in the Irish case, health warnings on the label of alcoholic products.

Distraction – Talking about other risk factors

Throughout the process, the statement has also been made that alcohol gets an unfair treatment compared to other risk factors for health harm. At an EU commission hearing discussing the cancer warnings that are part of the Irish proposal, advocates for the wine industry argued that many countries and the WHO fight alcohol consumption but instead support cannabis use,[9] exemplifying a whataboutism that the distortion strategy is based upon. They point to other factors that cause health harm as a way to shift the focus.

The common ground for the distraction argument is that they are making statements that are beside the point, simply to distract from the harms of alcohol. To say that cannabis or unhealthy food is harmful too does not take away from the fact that alcohol is harmful, and what is happening with the policies on other harmful products ought not be a concern for the alcohol industry. Two wrongs do not make a right. Yet the industry uses these arguments as a means of distraction in the debate on alcohol harm.

Distinction – European Culture and alcohol

A final strategy used by the industry is trying to use the history of alcohol in Europe to build a narrative against effective alcohol policy, often by pointing out that alcohol is something else than an ordinary product. The strategy is both used as a method to make alcoholic beverages seem more essential, as well as a method to distract discussions away from the harmful aspects of alcohol consumption and instead focus on its cultural history.

This strategy has been effective for the industry since it has given them access to new lobbying arenas and forums in the EU. A great example is the European Parliament Beer Club, an association between Members of the European Parliament and The Brewers of Europe that has a goal to discuss issues that affect the brewing sector in Europe. Their joint statement is as follows:

“The EP Beer Club believes that Beer is part of Europe’s heritage and tradition, and aims to support the responsible growth and stability of the brewing sector in the European Union.”

– EP Beer Club mission[10]

The brewing sector, by framing beer as part of European culture, have managed to build an association that gives them unprecedented direct access to Members of the European Parliament to discuss issues they have. A privilege no other product in the EU has, not to mention other products that causes serious public health harm.

Furthermore, the strategy can often be seen in negotiations, where the cultural framing is used as a way to argue that policies that would reduce alcohol consumption and alcohol-related harm also would undermine European culture. An example of this is the following intervention made by a member of the wine sector regarding Ireland's attempt to strengthen consumer information by introducing health warnings.

“These measures really do directly attack our culture and our wine culture. We need to work together against such initiatives. It is our culture, it is our product that is under attack. The measures aim at doing away with consumption of alcoholic beverages. (..) We need to fight against measures reducing consumption. We cannot agree to have these measures imposed upon us. Our culture is at stake and our sector is at stake. At the same time that the WHO and various countries are fighting alcohol as the enemy,”

– Indirect quotation made by a member of the EU Commission Civil Dialogue Group on Wine, 2018, per anonymous source

This strategy is a common go-to for the alcohol industry at the European level since it offers both the ability for the industry to get increased access and influence in questions they otherwise would not, as well as diverge the discussion on alcohol from its negative health impacts to something else.

CONCLUSION

This report has outlined and mapped the lobby efforts from the alcohol industry on EU-level, showing the extent of their interference with alcohol policy, as well as the strategies employed by them. What the first chapter of the report shows is that alcohol industry lobby presence takes many different forms on the EU level, some more direct and some more indirect. It further shows the different ways industry actors are connected. It is therefore fair to talk of one coherent industry that is interfering with public health policy.

The second chapter shows that there is a big difference in representation between alcohol industry actors and public health NGOs, both when it comes to number of employees working with EU-lobbying as well as number of meetings held with high-level EU officials. For every meeting an NGO has with the EU Commission on alcohol policy, the industry has over 19.

The concluding point with relation to this is that not only is the industry being consulted, but it is being consulted significantly more than public health non-profits. This, even though they due to their conflict of interest ought not to be consulted at all. With regard to public health policy, the presence of the industry in any debate is deeply regrettable, as they have a profit interest that is in opposition to the well-being of the people.

The third and last chapter of this report has showed the different and highly strategic ways in which the alcohol industry works to influence alcohol policy on the EU-level, and to uphold an image of being a legitimate actor on the matter. The example of Ireland shows an example of a specific public health policy that the industry has been working against, not only showing in detail the strategies of the industry, but also an example of the industry using the EU sphere to undermine the public health policy of an independent Member State.

To conclude, the alcohol industry's presence in the EU debate on alcohol is a great obstacle to creating evidence-based public health policy in the EU and its Member States. This is ultimately a democratic problem, as the health of people are being disregarded in favour of the profits interests of a harmful industry.

REFERENCES

1. See data in chapter 2
2. Bryggeriforeningen, 2021. Medlemmar, Bryggeriforeningen. [Online] Available at: <https://bryggeriforeningen.dk/foreningen/#medlemmer> [Använd 21 01 2021].
3. EU Transparency Register
<https://ec.europa.eu/transparencyregister/public/homePage.do>
4. Sprit och Leverantörsföreningen, 2021. Medlemmar i SVL. [Online] Available at: <https://www.svl.se/medlem/medlemmar/> [Använd 21 01 2021].
5. Petticrew, M., Maani Hessari, N., Knai, C. & Weiderpass, E., 2017. How alcohol industry organisations mislead the public about alcohol. Drug and Alcohol Review.
6. Ibid p. 2
7. https://www.who.int/europe/health-topics/alcohol#tab=tab_1
8. <https://apps.who.int/iris/bitstream/handle/10665/336595/WHO-EURO-2020-1435-41185-56004-eng.pdf?sequence=1&isAllowed=y>
9. Indirect quotation made by a member of the EU Commission Civil Dialogue Group on Wine, 2018, per anonymous source
10. EP Beer Club, u.d. About the EP Beer Club. [Online] Available at: <https://www.epbeerclub.eu/about-the-ep-beer-club/> [Used 18 January 2021].