



## **WHO Submissions to public hearing on ways of reducing harmful use of alcohol**

**Deadline 31 October 2008**

### **Question 1: What are your views on effective strategies to reduce alcohol-related harm?**

STAP (the National Foundation for Alcohol Prevention, in the Netherlands) has the experience that the key explanatory factors related to alcohol problems are the easy access to alcohol, low prices, the intensity of the marketing and the unrealistic health image of alcohol.

Babor et al. (2003) have reviewed a wealth of scientific evidence on effective policy measures. Based on this compilation of studies we as STAP believe that more effective policy measures to reduce alcohol consumption and alcohol-related harm are the following:

- Price policy to influence affordability
- minimizing physical availability of alcohol (e.g. by restricting the number of outlets, hours/days of sales, by removing sweet alcohol-pops from the supermarket, etc)
- minimum legal purchasing age (18 years)
- improving the enforcement of the minimum legal drinking age
- ban on alcohol advertising
- random breath testing
- brief interventions for high risk drinkers
- see Babor et al., 2003 p.264-266.

Less effective and often costly measures include e.g. educational measures such as:

- alcohol education in schools
- public service messages
- college student education
- warning labels
- see Babor et al., 2003 p.264-266.

STAP pleads for an integrated approach (based on the systems approach by Harold Holder, see Holder, 1998). Effective alcohol policy should always be based on three key elements:

- increasing the awareness of the problem and public support for policy measures (obtained by communication strategies and media attention)
- implementation of effective legal regulations
- enforcement of these regulations

These principles can be implemented on national policy level as well as on regional and local level. An important condition of effective policy is the availability of data and of evaluation studies.

## **Question 2: From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?**

On a more global level there are several ways to tackle alcohol-related harm. Below are several topics that deserve special attention, according to STAP:

- Free trade agreements vs public health.  
Countries that want to undertake action on their national levels are often hindered by legal restrictions due to super national trade agreements. It would be very helpful if it would be possible to make exceptions to these agreements based on public health grounds. Alcohol is no 'ordinary commodity'. Member states should not be restricted in pursuing their own national/local alcohol policies due to European/global trade agreements.
- Taxation.  
Taxation is one of the most effective measures to reduce alcohol-related harm and relatively cheap to implement. The economic costs (e.g. health care, police, justice etc) in the EU due to alcohol use are four times as high as the total tax profits in the EU member states (Cnossen, 2006). Ad to that the immaterial costs (e.g. the 10.000 traffic deaths and social problems in families, abuse, aggression etc.) and it is actually unbelievable that alcohol still seems to be such an 'ordinary commodity', which it, obviously, is not.

Tax rates differ between EU member states. Approximately half the member states e.g. have no excise duties on wine (wine producing countries even receive fundings from the EU to promote wine drinking because wine is classified as an agricultural product in some of these countries). According to STAP, tax levels should be more harmonised (based on Purchasing Power Parity per country and based on the economic principle that the level of taxation on products like alcohol and tobacco should relate to the costs of these products for society) and EU wine allowances should be stopped.

- Minimum pricing  
The easy availability of alcohol in supermarkets in connection with the growing popularity of drinking in private places are important clarifying factors of the alcohol problem in modern societies. Regular price discounts of alcohol in supermarkets are influencing the buying behaviour of clients and stimulates drinking. STAP pleads for a policy of minimum retail prices for alcohol based on health arguments.
- (Total) ban on alcohol advertising.  
Several longitudinal studies have shown that exposure to alcohol advertising and/or marketing lowers the age of onset of drinking in young people and also increases alcohol consumption on the long term (e.g. Collins et al., 2007; Ellickson et al., 2005; Henriksen et al., 2008; Snyder et al., 2006; Stacy et al., 2004). Only one out of 13 longitudinal studies found no effect of exposure to (outdoor) alcohol advertising on drinking behaviour (Pasch et al., 2007). Expectancies about alcohol already develop long before the onset of drinking. The way alcohol is portrayed in the media contributes to these expectancies.

To better protect children against the effects of alcohol marketing, STAP pleads for a total ban on alcohol advertising (similar as with tobacco). In case a total ban for all alcohol advertising is not feasible, then at least a restriction of the volume of alcohol advertising/marketing for traditional media (e.g. radio, tv, print, outdoor) is suggested (e.g. time ban for radio and television). For relatively new types of media (e.g. internet, buzzmarketing, viral marketing, sponsoring, SMS, etc) a total ban is preferable since these types of alcohol marketing cannot be easily monitored by independent parties. This way, it will never be clear how many

minors are being reached by this type of advertising. The industry has more access to this type of data, but these data are not accessible for the public.

The voluntary codes of the industry focus mainly on content restrictions of alcohol advertising and to a far lesser extent on restrictions of the volume of alcohol advertising (STAP, 2007). We know from research that the volume of alcohol advertising has a large impact on drinking behaviour of young people (e.g. Collins et al., 2007; Ellickson et al., 2005; Henriksen et al., 2008; Snyder et al., 2006; Stacy et al., 2004).

In the self regulation codes, the industry often employs the so-called 25%-rule. The EFRD (European Forum for Responsible Drinking) even uses a 30% rule. According to this rule, no audience consisting of more than 25% (or 30%) minors may be reached with alcohol advertising. However, EU27 member states contain on average 19,4% minors (Eurostat). In practice, alcohol advertising can therefore take place freely because the 25% limit (and to an even lesser extent the 30% limit) will not be crossed easily. Another disadvantage of this rule is that in absolute numbers, still a lot of minors are being reached by alcohol advertising. In theory 100% of the EU minors are allowed to be reached by alcohol advertising, as long as there are more adults watching (e.g. with soccer cups).

- Standardisation of drink units.

Drinking guidelines for 'acceptable drinking' are very different throughout countries. The guidelines often mention the 'number of glasses' and, to a lesser extent, the number of grams. For the individual it remains unclear how many grams of alcohol a beverage contains. Because glasses, packages, etc differ between countries, brands and type of alcoholic drink, a 'standard alcoholic consumption' in fact doesn't exist anymore. In order to standardise alcoholic consumptions on a global level, it is necessary that all alcoholic beverages contain the number of grams of alcohol on the label (and not only the percentage of alcohol). This way, global guidelines can be developed and the risk of overconsumption due to confusing drinking guidelines might be reduced.

STAP is a strong proponent of a world-wide Framework for Alcohol Policy similar to the WHO Framework on Tobacco Control. A world-wide agreement about effective policy instruments to reduce youth drinking, to reduce harmful drinking by adults, to reduce drunk driving and to protect third parties frees the way for effective policy making on local, national, European and global level.

STAP advises that the alcohol industry (although involved in producing and distributing alcoholic products), should not play a role in the development of effective alcohol policy, on any level. Commercial interests and maximizing profits are not compatible with public health interests such as the reduction of alcohol-related harm.

**Question 3: In what ways can you or your organization contribute to reduce harmful use of alcohol?**

"STAP is a national, independent non-profit organisation that advocates effective alcohol control policies and works towards public awareness of the risks of alcohol".

STAP is operating on several levels:

- Local
- National
- European

STAP focuses on several topics:

- Monitoring alcohol marketing  
STAP has been monitoring the alcohol marketing in the Netherlands for several years (commissioned by the ministry of Health, Welfare and Sports). Therefore, we have gained a lot of knowledge about the functioning of self regulation of the alcohol industry. Together with several other NGO's we promote the monitoring of alcohol marketing in other European countries (done by EUCAM, the European Centre of Monitoring Alcohol Marketing, [www.eucam.info](http://www.eucam.info)). STAP and EUCAM both promote and disseminate research on the impact of alcohol advertising on young people.
- Local alcohol policy  
Without the support from local and regional authorities national alcohol policy is hard to implement effectively.  
STAP supports Dutch municipalities in the development of local alcohol policy ([www.alcoholbeleid.nl](http://www.alcoholbeleid.nl)). We write local policy plans, conduct local research and coordinate local and regional projects. STAP is involved in most Dutch local projects and played an important role in the development of a local policy guideline in 2007. General aim is to promote inter-sectoral alcohol policy based on the systems-approach of prevention.  
In Europe we coordinate the local policy work package of the Building Capacities program. STAP also develops local alcohol policy in two Romanian municipalities together with national prevention partners over there.
- Promotion of alcohol free environments (alcohol & pregnancy, alcohol free zones for young people below 16 etc.)

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