



**AlcoholAction**  
Ireland

Submission to the  
**World Health Organisation (WHO)**  
web based consultation on the  
first draft of an action plan to  
strengthen implementation of the  
**Global Strategy to Reduce the Harmful Use of Alcohol.**

**SEPTEMBER 2021**

Alcohol Action Ireland (AAI) is the independent advocate for reducing alcohol harm.

We campaign for the burden of alcohol harm to be lifted from the individual, community and State, and have a strong track record in effective advocacy, campaigning and policy research.

Our work involves providing information on alcohol-related issues, creating an understanding of alcohol-related harm and offering public policy solutions with the potential to reduce that harm, with an emphasis on the implementation of Ireland's Public Health (Alcohol) Act, 2018.

AAI support the work of Ireland's Health Services Executive - HSE Alcohol Programme, informing strategic alcohol initiatives as an instrument of public health planning. We act as the secretariat to the Alcohol Health Alliance Ireland, as its co-founder, and serve on the Board of Eurocare – European Alcohol Policy Alliance, Brussels.

Alcohol Action Ireland believes that a range of policy measures, informed by the WHO 'Best Buys' can be adopted, and contribute to the objectives of public health alcohol policy, reducing alcohol use globally and so lessening alcohol related harms across society.

We are pleased to have a further opportunity to comment on the first draft of the action plan published and applaud the commitment and purpose of the WHO (the 'Secretariat') in engaging with such an open and transparent process.

## Summary observations on the First Draft

Alcohol Action Ireland welcome the comprehensive endeavor which the draft document envisages and believe it to be a solid starting point for the development of a global action plan; we note with some disappointment the uneven implementation globally and the lack of tangible progress amongst the high level of objectives for the global strategy to reduce the harmful use of alcohol.

In particular, we are reminded of the enormous impact on the lives of those who live with alcohol use disorders and especially those drawn into dependency.

The harm from alcohol use is indeed not just limited to health consequences and we believe the significant loss of human creativity, enterprise and potential must to be voiced.

We appreciate the formidable challenges in implementation of the global strategy, and while cognisant of the constrict established by the Executive Board's 2020 decision, propose a bold paradigm shift on:

- the perception of both the use, and the risk, of alcohol;
- the need for a global normative law on alcohol, and
- a reassessment of the maligning influence of the global alcohol economic operators,

be adopted.

The document from the Secretariat outlines existing and emerging opportunities for reducing the harmful use of alcohol, which we recognise, with some additions on the pursuit of better lifestyles, the positive influence of social media and the dividend return from intervention.

The scope of the action plan, the goal of the action plan and the proposed operational objectives, guiding principles and key areas for global action are broadly fit for purpose but will benefit from a bolder choice of action and clarity of concept, reflective of our earlier observations to the series of challenges to meaningful progress.

## Missed opportunities

An ambiguity that lies within the premise to reduce the harmful use of alcohol.

Alcohol Action Ireland recognise the legal standing of alcohol throughout our society, and the freedom of enterprise to market and trade in its products. However, we are equally clear in our belief, that the inherent risk to human health, and the impact to the lives of others, from alcohol use cannot, determined to give priority to protect public health, be defined within harmful use of alcohol alone.

Notwithstanding the political challenge to construct unanimity amongst Member States to establish a Framework Convention on Alcohol Control, the inherent risk to public health must be unequivocally declared, and not qualified by degree of consumption or commentary of prevailing cultural or social norms, that alcohol use causes disease, dependency, disability and death to the individual and to others.

The absence of such clarity, and the persistent ambiguity on alcohol use, on our view only facilitates political ambivalence and fosters opportunity for economic operators to further contaminate the processes to promote measures of alcohol control.

Furthermore, by providing such clarity, and defining public health leadership, the Secretariat should also champion a fundamental consumer principle of the Right to Know<sup>3</sup>; a principle of human right in health that recognises that citizens are autonomous, independent agents with the right to make informed decisions regarding their health and well-being.

In our view, It is a truism<sup>4</sup> that citizens cannot reasonably exercise a responsibility to be informed unless fixed with sufficient knowledge to make informed choices. To be effectively informed of the inherent risk from alcohol use, one must be in possession of all information to make informed choices and decisions.

Without such a commitment the inertia of Member States to implement 'best buys' of the action plan will be prolonged and the denial of such profound risk by the economic operators will persist.

## The dichotomy of relevant stakeholders

Alcohol Action Ireland recognise the necessity for an action plan to embrace the widest possible set of stakeholders, and that collectively with unity of purpose, incremental change can be forged and realised.

In this context, it is understood that the Secretariat would seek to align the interests of stakeholders from Member agencies, states, international partners and non-state actors. However, a fundamental dilemma arises when a false equivalence is established amongst these various stakeholders.

5

A principle of equivalence that puts the role and purpose of civil society organisations, professional associations and research institutions - seeking only to protect public health - as equal contributors to an action plan, as that of the economic operators, who hold a principal responsibility for the risk to public health, is flawed.

### *Civil society organisations.*

Alcohol Action Ireland would forward a view that the voice of civil society organisations, professional associations and academia are both the primary agitator and sustainer of strategic progress on reducing the use of alcohol and related harm.

This primary contribution must be recognised by the Secretariat, not just as an unique constituent but as a stakeholder who needs special attention, assistance and support. It is they, and they alone, who largely uphold the universal principles of public health interventions and who, in recognising the duplicitous commercial practice of economic operators, would not wish to coalesce in an endeavour that affords economic actors an equality of integrity or purpose to obtaining the objectives of the action plan.

While civil society organisations, motivated by the human tragedies that alcohol use delivers, will always be at the vanguard of activism, its contribution to any action plan, and its authority, founded on a deep experience and knowledge of the inherent risk and lasting damage of alcohol use, must be acknowledged with greater purpose by the Secretariat.

*Economic operators.*

At the heart of the first draft of an Action Plan is an accommodation of the economic operators – the global alcohol industry and trade. This accommodation seeks to afford the pecuniary interests of alcohol producers and trade a valid contribution to a global strategic endeavour to reduce the harmful use of alcohol.

It is our view, that this accommodation is irrational and cannot be sustainable, as the commercial imperative of the economic operator is to advance and expand the global alcohol market.

Equally, the ambition of the global alcohol industry's corporate and social responsibility strategy, fashions evidence of its contribution as a solutions-based partner to a global public health crisis it in fact perpetuates.

Their insatiable commercial practices demands the inherent risk of alcohol use must be denied, the untold harm to others is undermined, while accumulative revenues remain unhindered of the societal cost it has caused.

Meaningful progress to strengthen implementation of the global strategy to reduce the harmful use of alcohol, its goal and objectives, will need the contribution of the economic operators to be re-evaluated.

Here, AAI wish to express its support for the views of our colleagues' submissions to the consultation from:

- o Alcohol Future Policy Group,
- o Eurocare,
- o Global Alcohol Policy Alliance, and
- the Institute of Alcohol Studies.

## Comment on the development of an action plan and the proposed text.

### Setting the scene (p.1)

While we concur with much of the direction outlined, we query the on-going contribution of the SAFER initiative going forward, and ask, does this initiative not add a layer of confusion to the wider alcohol policy strategic direction? While developed in good faith to support and reinforce the Sustainable Development Goals, it may be appropriate to utilise this on-going development of an action plan, to streamline the strategic alcohol policy objectives within one unified purpose.

In this respect, AAI support the clarity within the WHO 'Best Buys' and the particular need to prioritise alcohol pricing mechanisms (minimum unit pricing), comprehensive restrictions on alcohol marketing (including cultural/sporting sponsorship) and enacting and enforcing restrictions on physical availability of alcohol products.

We would suggest that the lack of tangible progress on reducing global alcohol consumption per capita, is indicative of the relentless commercial pursuit of the drinker; the decline of drinkers across the regions may be testimony to a modest appreciation of the inherent risk of alcohol use.

In outlining that the harmful use of alcohol is not limited to health consequences, we suggest the Organisation could also address the potential loss of creativity, enterprise and human endeavour attributable to alcohol use, and that, in acknowledging insufficient reductions in alcohol related morbidity and mortality, one testifies to a persistent, fundamental lack of societal understanding of the risk.

### *Challenges in implementation of the Global Strategy (p.6)*

The document speaks to many challenges to the development and implementation of effective alcohol policies – central to this complexity is the accommodation of economic interests; were the policies pursued singularly on the basis of public health objectives and the economic interests or priorities relegated, development and implementation would be inordinately easier.

Many challenges outlined such as prevailing social norms, commercial messaging, the lack of strong international leadership, competing interests and the lack of binding regulatory instruments, all persist because of the political primacy afforded the economic operators.

*Opportunities for reducing the harmful use of alcohol (p.8)*

The document speaks to a decrease among young people with a view that this 'seems to be continuing into the next age group' – our national experience (Ireland) would suggest that an ageing maturity shift is critical here and that while early adolescents use of alcohol has declined, the frequent use amongst young adults has been consolidated and shows no indication of slowing.

We believe the document articulates a crucial point on the Return on Investment from alcohol control's 'Best buys' and we encourage bolder leadership from the Secretariat in this regard, as it brings an financial immediacy that is attractive, and encouraging, to Member State action.

The recent report from the OECD (Health Policy Studies) 'Preventing Harmful Alcohol Use' 2021 is instructive in this regard.

**SCOPE OF THE ACTION PLAN (p.10)**

As previously outlined, the centrality of a contribution from economic operators, fundamentally weakens the scope of the plan; the transnational reach and accompanying financial resources of the global alcohol producers enables the commercial interest to undermine concerted actions.

Separately, and with reference to linking this action plan to other relevant global action plans, Alcohol Action Ireland, mindful of the growing prevalence of foetal alcohol spectrum disorders (FASDs), propose that the Organisation's 'Every Newborn' action plan be linked.

**GOAL OF THE ACTION (p.11)**

While the goal of the action plan is clear, Alcohol Action Ireland believes it should seek to further reinforce the inherent risk of alcohol use and the role that greater understanding can achieve. Also, while the goal recognises the interaction at regional levels, we would recommend that regional entities and other supranational organisations such as the European Union, the Organisation for Economic Co-operation and Development, et al., be engaged around the goals and objectives of the action plan.



Operational objectives/principles of the action plan (p.12)  
Alcohol Action Ireland agree with the objectives/principles as stated but believe that the fourth operational objective could be strengthened to hold a higher ambition on ensuring greater understanding and appreciation of the risk and harm associated with alcohol. Equally, the objectives could recognise the citizens' right to know the inherent risk of alcohol use.

### **KEY AREAS FOR GLOBAL ACTION (p.14)**

Alcohol Action Ireland are broadly supportive of the proposed action areas, global targets and actions outlined. However, we restate our view that the equivalence afforded the economic operators will ensure that the ambition articulated will be slowed and hindered. The evidence for such an assertion is evident in the uneven implementation globally and the lack of tangible progress amongst the high level of objectives for the global strategy to reduce the harmful use of alcohol.

In specific terms, we wish to highlight some clarifications to proposed actions within Action Area 2: **Advocacy, awareness and commitment:**

*Proposed actions for Member States, Action 7* – national alcohol awareness day; we believe a co-ordination with an international day of awareness would enhance effectiveness and lend credibility to national initiative.

*Proposed actions for Member States, Action 8* – consumer protection measures; a Member State recognition of the consumers' 'Right To Know' would be a significant advance to the development and implementation of meaningful labelling requirements for alcoholic beverages.

*Proposed actions for International partners, civil society organisations and academia. Action 2* – an invitation to strengthen advocacy and support policy options, etc. This type of capacity remains a matter of financial and human resources that is currently limited. This proposal should drive the advocacy for a national financial instrument such as a levy on alcohol sales (proposed in Action area 6, Action 2).

This type of earmarked funding or contribution from alcohol tax revenues or other revenue linked to alcohol production and trade (a percent of On & Off trade revenues), could also support the principal aims of Action area 5: Knowledge production and information systems critical to meaningful advocacy, policy prioritisation and evaluation.

Crucially, these funds were they to materialise cannot be within the gift of the alcohol industry and must be gathered and distributed by accountable public officeholders/agencies.

Additionally, AAI wish to endorse the five priority areas for improvement of the draft alcohol action plan submitted by the Alcohol Policy Futures group, namely:

- Further strengthen the focus on the alcohol policy best buy solutions, including better/ more specific targets and indicators,
- Review the role assigned to the alcohol industry in the document, and better cover conflict of interest concerns,
- Improve and develop the terminology, especially concerning the concept of “harmful use of alcohol”, and the definition of “economic operators”,
- Review and improve the structure, logic and coherence of the action plan, and
- Strengthen review of and reporting on progress (or lack thereof) on a regular basis, including capacity building to do so, as well as resourcing

**Alcohol Action Ireland wish the Secretariat well in its endeavour to advance an action plan to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol.**

**We hope our contribution can be of some assistance and we remain available to your good office should any further clarification be required.**

**Alcohol Action Ireland**  
September 2021.