

Proposed Sale of Alcohol Bill...Wrong direction of travel for Ireland.

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The proposed Sale of Alcohol Bill contains measures which, if enacted as proposed, will result in increased alcohol harms and deaths in Ireland.

The Government of Ireland enacted the Public Health Alcohol Act in 2018 to much international acclaim, with the express aim of reducing alcohol harms. It would be shameful if this Government were to enact the proposed harmful Sale of Alcohol Bill as is.

Alcohol is no ordinary commodity, and is quite different from everything else sold in retail in Ireland. It is a psychoactive, dependence-producing, and intoxicating. It is a carcinogenic, neurotoxic, teratogenic and addictive substance. Alcohol causes numerous illnesses and deaths. In Ireland, at least 4 deaths per day result from alcohol use, which is more than 1,400 per year. The main harms in Ireland are liver disease including cirrhosis and liver failure, 7 types of cancers and mental ill-health. One third of these alcohol-related deaths result from incident and injury related to the event of drinking such as falls, assaults, traffic collisions and self-harm. Alcohol is a major cause of disability, especially in young and middle-aged individuals. Younger people are disproportionately affected by alcohol compared with older people. 13.5% of all deaths among those aged 20–39 years are attributed to alcohol. Disadvantaged and vulnerable populations have increased rates of alcohol-related death and hospitalisation.

As well as the devastating impacts of alcohol on individuals and families, the estimated economic cost of alcohol use is at least [€3.7 billion per year](#) in Ireland, including a cost of at least €1.2 billion for healthcare of alcohol-related illnesses and injuries. There are further costs in terms of loss of productivity, and the OECD estimate, based on Ireland's current use of alcohol, Ireland's GDP is likely to be 1.9% lower on average between now and 2050.

However, despite all the research and reliable evidence, and despite our own, almost universal, personal negative experiences of alcohol harms in Ireland, when it comes to drinking alcohol, many of us are in denial about the harms it causes our own health and society at large. There are many reasons for this ambivalence, including that many of us enjoy alcohol in moderation, and consuming alcohol is extensively and successfully marketed to us all as an attractive, socially normal activity to engage in at almost every occasion possible in Ireland. Alcohol is inextricably linked to much of what we do in Ireland.

It is complete fantasy that alcohol is a harmless source of enjoyment– a myth created by the multinational alcohol industry through powerful and harmful advertising and marketing. This profit-focused industry knowingly sells a harmful product without adequately warning consumers. The relentless alcohol advertising and marketing, and its slavish association with

many Sporting and Arts events, increases alcohol sales and also greatly influences our political responses to the resulting health problems.

The evidence regarding alcohol consumption causing health and other harms and deaths is incontrovertible, for both individual citizens and society, in Ireland and internationally. The alcohol industry does its utmost to downplay and deny these harms.

This month, the World Health Organization (WHO) unequivocally stated that when it comes to alcohol consumption, there is [no safe amount that does not affect health](#). The WHO strongly advises that implementing key strategies in reducing alcohol harms are legislation regarding price, marketing and availability of alcohol.

Unfortunately, Ireland has not fully embraced this advice and is at risk of making harmful initiatives.

[Hospital admissions](#) for alcohol-related liver disease increased by 262% from 1995 to 2017, reaching the highest they have ever been since recording began. In Ireland, the average length of stay in hospital for alcohol-related conditions increased from 6 days in 1995 to 10 days in 2018. Alcohol causes around 1000 cancers every year in Ireland.

In the face of a dreadful crisis in healthcare bed capacity, approximately 1,500 hospital beds are used every day for alcohol related illnesses. ED departments, currently at breaking point, are also hugely impacted by alcohol use. A [study](#) in 29 emergency departments in Ireland found that alcohol accounted for 6% of all patients presenting to ED, with 57% arriving by ambulance. In the early hours of Sunday morning, alcohol-related illnesses and injuries accounted for 29% of all presentations to ED.

It is in this awful landscape of alcohol harms and deaths, that the Government is planning to increase the availability of alcohol in a misguided effort to stimulate the night-time economy, through significant extensions to opening hours and increases in both the number and type of venues permitting sale of alcohol. Such increases are designed to enhance alcohol sales and with that will definitely increase alcohol harms. The research and evidence for increased harms from increased availability of alcohol through increased number of outlets selling alcohol and increased hours of sale is overwhelming. Concerns about this Bill have been expressed across society including a recent [poll](#) indicating almost 50% opposed to the proposals.

Public health alcohol policy as set out in the Public Health (Alcohol) Act 2018 (PHAA) seeks a 20% reduction in alcohol use across the whole of population, through a series of modest measures. The measures in the PHAA reflect the WHO evidence-based recommendations to effectively reduce alcohol consumption and harm.

Given that the Sale of Alcohol Bill seeks to increase the availability of alcohol, it is clearly at odds with the objectives of existing PHAA legislation and indeed may reverse whatever progress that is being made.

Ireland's profoundly unhealthy relationship with this psychoactive substance has huge human and financial implications across society. Alcohol is 'no ordinary commodity'. Sale of alcohol is therefore unlike the sale of any other retail product, and its licensing must reflect its extensive harms and costs to Irish society. Licensing cannot be viewed simply as an administrative process that will allow businesses to garner more trade, but must also be viewed through a health and wellbeing lens.

The harms caused by alcohol occur in individuals right across the range of alcohol consumption. For instance, regular consumption of one standard drink per day is associated with an increased risk of breast cancer. Half of all alcohol-attributable cancers in the WHO European Region are caused by "light" and "moderate" alcohol consumption. There is no safe level of alcohol consumption in pregnancy. Binge drinking causes many harms and deaths. There is a popular and misleading narrative, often promulgated by the alcohol industry, that only people with a dependency on alcohol have a problem, or cause problems in society or the family. This has long been debunked by extensive research and evidence. Such an ill-informed narrative, though, is a powerful obstacle to political acceptance of public health measures to reduce alcohol use.

It is critical that the health and well-being of individuals in our society is a high priority in any new proposed legislation. Measures proposed under the Sale of Alcohol Bill will harm individuals in Ireland, causing costs – both human and financial – to increase, and potentially reverse much of progress being made since the passage of the Public Health Alcohol Act.

As the Oireachtas begins to consider this Bill, the wellbeing of citizens and public health considerations must be given primacy over the vested interests of those allied to the alcohol industry who have lobbied for this legislation. As suggested by the OECD, tackling alcohol consumption and its related chronic diseases should be a policy priority and can be economically sound.

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