



A First Submission

in the context of
DG SANCO's First Draft Working Paper
on a "Coordinated Approach in Europe
to Tackle Alcohol-Related Harm"

September 2004



The Brewers of Europe

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Preface

“To prepare us for complete living is the function which education has to discharge.”

*Herbert Spencer (1820-1903)
Essays on education and kindred subjects*

This document constitutes the first submission of ‘The Brewers of Europe’ in the context of DG SANCO’s “First draft working paper on a coordinated approach in Europe to tackle alcohol-related harm”, which has been drafted following the Council Conclusions of 5 June 2001 on a Community strategy to reduce alcohol-related harm.

From this first submission it should be clear that The Brewers of Europe shares the concerns expressed by the Council regarding alcohol-related harm and stands ready to be part of the solution.

We welcome the Commission’s efforts to combat the problem and have already been working to confront this issue for many years before an official strategy process was launched.

We think it is of utmost importance that any European strategy takes account of the wide variety of societies, economies and cultures across the enlarged EU. Specific problems that exist in a limited number of countries do not exist at all in others. Consequently, it would be extremely unwise to consider policy responses that are favoured in some countries as being applicable to others.

In this context, The Brewers of Europe would also like to note that Article III-278 of the Treaty establishing a Constitution for Europe clearly excludes any harmonisation of the laws and regulations of the Member States in relation to protection of public health regarding the abuse of alcohol.

The Brewers of Europe also very strongly believes that education should be the cornerstone of the responses to the existing problems. It is parental guidance and education that shapes the individuals and the societies.

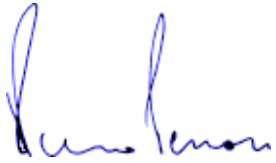
The first chapter of this submission will outline the role that beer and the brewing industry have played and will continue to play in an expanding Europe. It will also clearly state who we represent in our proposals for action.

The second chapter will give an assessment of what we believe the problem is – inappropriate consumption of our products – and our views on different policies, including those mentioned in the Commission’s draft. It is our belief that targeted measures based on all the evidence are what is required and some population-based strategies may even aggravate the problem of misuse. Also, any measure considered necessary should be subject, at the appropriate decision-making level, to proper impact assessment and to stakeholder consultation.

The third chapter will look more precisely at the key action areas for targeting misuse, particularly in the context of the DG SANCO's first draft paper. This will give the position of The Brewers of Europe concerning different areas for action, outlining where the brewers are already active and involved in partnership with other bodies, and also where the brewers believe that there is potential to develop further and create new partnerships.

All the strategies proposed by 'The Brewers of Europe' have as their direct aim the reduction of alcohol misuse, an enemy common to all stakeholders.

We look forward to further collaborating with the Commission, national authorities and other stakeholders as appropriate.



Piero Perron, President

PART ONE THE ROLE OF BEER AND THE BREWING INDUSTRY IN EUROPE

Beer

An agricultural product

Clay tablets with a recipe for beer, from approximately the year 6000 B.C., in Babylonia, represent the first documented evidence of beer making. Ever since then beer has been brewed from natural, wholesome raw materials produced from the land.

The four main raw materials from which beer is brewed are:-

- **Malt:** The European brewing industry uses around 5 million tonnes.
- **Hops:** The European brewing industry uses around 30,000 tonnes.
- **Yeast:** Allows the wort (the hop/malt mixture) to ferment.
- **Water:** Beer is over 90% water. Many breweries have their own water source.

Many different beer styles form an integral part of the European brewing traditions, including alcohol-free beer, which is produced and consumed across Europe (in Spain, alcohol-free beer represents almost 10% of beer sales).

The average alcoholic strength of beer is 4.5%, obtained exclusively from natural fermentation.

Part of healthy lifestyles

Beer is part of European culture and traditions. It has been a staple part of people's diets for thousands of years and, when consumed in moderation, as is done so by the vast majority of drinkers, can form part of a healthy lifestyle. However, excessive beer consumption can be harmful and is associated with many chronic health problems.

The European Brewing Industry

Over 2000 breweries across the EU25 generate and support, directly and indirectly, more than 4 million jobs through the production and sale of beer.

Over 60% of world beer exports come from the 25 EU Member States.

30% of the world's beer production is brewed in the 25 EU Member States.

The brewing landscape in Europe is characterised by a very large majority of small and medium-sized (family) breweries.

Five of the six largest brewing companies worldwide, i.e. Carlsberg, Heineken, Inbev, Scottish & Newcastle and SABMiller are located in the EU and represent around 50% of the market share.

Beer makes a significant and valuable contribution to the social, cultural and economic life of Europe. The brewing industry makes a huge economic contribution to the lives of individuals, companies, countries and the whole of the EU. In addition the EU15 brewing industry already contributes, in excise duties, more than 8.5 billion euros annually to national governments' budgets, which is equivalent to 7.7% of the 109.5 billion EU Community budget for 2005.

The European brewing industry is committed to its responsibility in key areas such as the environment, food safety and commercial communications, whilst maintaining its right to be competitive and innovative.

The European brewing industry promotes responsible drinking and is opposed to the misuse of its products.

Europe's brewers play a leading role in promoting and supporting, directly and indirectly, a growing number of social responsibility initiatives. The document "Global social responsibility initiatives", produced by the Worldwide Brewing Alliance, of whom The Brewers of Europe is a member, lists examples of many of these initiatives.

The Brewers of Europe

Founded in 1958 and based in Brussels, The Brewers of Europe is the voice of the European brewing industry to the European institutions and international organisations. Current members are the national brewers' associations of 21 European countries, representing more than ninety percent of the beer produced in the EU25. The Brewers of Europe also has close links with other brewers' associations across Europe.

By advising the EU institutions on all aspects of policy and legislation affecting the brewing industry, The Brewers of Europe is able to inform the institutions of its special needs and to ensure that legislative initiatives take its requirements into consideration.

In particular, The Brewers of Europe aims to further engage in constructive dialogue with all relevant Stakeholders, with a view to combatting alcohol misuse, the common enemy.

The Members of The Brewers of Europe are:

Austria

Verband der Brauereien Österreichs

Belgium

Belgian Brewers

Denmark

Bryggeriforeningene

Finland

Panimoliitto

France

Brasseurs de France

Germany

Deutscher Brauer-Bund e.V.

Greece

Greek Brewers' Association

Ireland

The Irish Brewers' Association

Italy

Associazione degli Industriali della Birra e del Malto

Lithuania

Lithuanian Brewers Association

Luxembourg

Fédération des Brasseurs Luxembourgeois

Malta

Malta Federation of Industry

Netherlands

Centraal Brouwerij Kantoor – CBK

Norway

Bryggeri- og mineralvannforeningene

Poland

The Union of Brewing Industry Employers in Poland - Polish Brewers

Portugal

APCV - Associação Portuguesa dos Produtores de Cerveja

Spain

Cerveceros de España

Sweden

Svenska Bryggareföreningene

Switzerland

Schweizerischer Bierbrauerverein

Turkey

Beer and Malt Producers' Association of Turkey

United Kingdom

British Beer and Pub Association

Our Liaison

A Member of the Confederation of the Food and Drink Industries of the EU (CIAA), The Brewers of Europe already works in liaison with:-

- The different European Commission services, including DG SANCO, particularly through Stakeholders dialogue (bi-annual meetings with national public health experts and other interested parties under the auspices of DG SANCO), and other Directorates-General in charge of agriculture, transport, taxation, environment, enterprise, internal market etc.
- Members of the European Parliament, in particular through the 'Bier Club';
- The World Health Organisation (Non-communicable Diseases cluster);
- Several Brussels-based horizontal and sector-specific European organisations, including the European Wine Committee (CEEV), the European Association of Cider Producers (AICV), the European Spirits Producers (CEPS), Hotels, Restaurants and Cafés in Europe (HOTREC) and The Amsterdam Group;
- Brewers' organisations in other European countries and, especially via the Worldwide Brewing Alliance, in Australia, Canada, Latin America, Japan, New Zealand and the United States;
- Social Aspects Organisations and Self-Regulatory Organisations.

PART TWO ADDRESSING INAPPROPRIATE CONSUMPTION

This part of our submission delineates the views of ‘The Brewers of Europe’ on the context in which inappropriate consumption of beer and other alcoholic beverages needs confronting. It includes comments on different policy proposals, with reference to the DG SANCO first draft working paper on a coordinated approach in Europe to tackle alcohol-related harm. This is followed by our views on the role that our industry can play as a stakeholder and the opportunities that exist to develop further and create new partnerships at many different levels of society.

The context

The vast majority of the population drinks responsibly

Across Europe the majority of the millions of adults who drink beer do so without causing themselves or others any harm. Pleasure and sociability are an integral part of the occasional consumption of alcoholic beverages and in most cultures drinking is adjunct to celebration. “One of the main reasons why the moderate drinking of alcoholic beverages is a common practice is that many people enjoy the relaxing, pleasant effect produced by one or two drinks” and the “psychotherapeutic value of this should be regarded as a potential health benefit”.¹

There is convincing evidence that moderate consumption of alcoholic beverages reduces the risk of coronary heart disease² and evidence is building of a beneficial effect in a number of other conditions³. Any measure that forces a reduction in overall consumption risks reducing the consumption below the level at which a health benefit has been observed for consumers already at lower consumption levels.⁴

The local context is key – Drinking patterns across Europe are very diverse

“The further south you go to Italy for instance, there is no difficulty along the lines that you talk about (alcohol consumption), so passing a piece of legislation (on advertising) at EU level that is really a problem on only one or two or three member states becomes more and more difficult.”⁵

The Brewers of Europe welcomes the general recognition of the existing wide variation between European countries in most aspects of drinking patterns.

Like any other aspect of lifestyle, drinking patterns and behaviours find their origins deeply woven into the social fabric of European societies and have been in play for long periods of time.

¹ Meister KA, Whelan EM and Kava R. (2000). “The health effects of moderate alcohol intake in humans. An epidemiologic review”. *Critical Reviews in Clinical Laboratory Sciences*, **37**(3) :261-247.

² Keil U. et al. (1997). “The relation of alcohol intake to coronary heart disease and all-cause mortality in a beer drinking population”. *Epidemiology*, **8**(2): 150-156.

³ For a detailed review on behalf of The Brewers of Europe, please consult [“The Benefits of Moderate Beer Consumption” – Third Edition, 2004.](#)

⁴ Duffy JC (1993). “Alcohol Consumption and Control Policy”. *Journal of the Royal Statistical Society*, **156** (2) :225-230.

⁵ Commissioner Byrne on RTE TV1 News in Ireland – 12th May 2004.

Drinking behaviours form part of the European diversity, and the continuation of the already growing research into patterns of alcohol consumption – who drinks, where, when, how, why and what they drink, can only be strongly encouraged. Indeed, drinking patterns have been recognised as being important determinants of both the positive and negative consequences of drinking.⁶ “Some of the rare long-term follow-up studies suggest that traditional cultural patterns are surprisingly persistent in the face of changes in economy, living conditions and alcohol policies.”⁷

Misuse is a problem

Excessive drinking by a small minority of consumers is associated with many health and social problems. Alcohol misuse by this small section of the population in some European countries is causing problems, in particular harm to health as a result of binge drinking and long term excessive consumption. The Brewers of Europe and its Members are opposed to the misuse of alcohol and play an important role in raising awareness of the implications of inappropriate consumption.

Young people

There is a big problem of drinking (and binge drinking) by young people. The Brewers of Europe therefore strongly opposes the sale of beer to minors under the legal age.

However, caution is highly advisable when qualifying or quantifying the evolution of alcohol consumption by young people throughout Europe. “There are different consumption patterns amongst European adolescents in terms of the frequency of consumption and repeated intoxication, the former not necessarily being related to the latter (...) In this case, the cultural differences between countries are significant”.⁸

In order to develop effective programmes to help inform young people of the dangers of misuse, their attitudes towards beer and other alcoholic beverages must be fully understood in relation to enjoyment, lifestyle and rites of passage into the adult world.

The Brewers of Europe believes that in countries where there are problems there is the potential to reduce alcohol misuse by young people by focusing on parental responsibility, since parents play a major role in influencing the behaviour of children and young people.⁹

Members of The Brewers of Europe are active in promoting and supporting, in partnership with other stakeholders at local level, information and educational schemes addressing young people in particular.

⁶ Murray RM, Connett JE, Tyas SL et al. (2002). “Alcohol volume, drinking pattern, and cardiovascular disease morbidity and mortality: Is there a U-shaped function”. *American Journal of Epidemiology*, **155**(3):242-248.

⁷ Norström T. ed (2001). “Alcohol in postwar Europe: Consumption, drinking patterns, consequences and policy responses in 15 European countries”. National Institute of Public Health, Sweden – European Commission.

⁸ “European Young People and Alcohol”, (2002), FOCUS Alcoologie No 4 , published by Institut de Recherches Scientifiques sur les Boissons (IREB).

⁹ Plant M and Miller P. (2001). “Young People and Alcohol: An International Insight”. *Alcohol and Alcoholism*, **36** (6) ; 513-515.

The evidence base

Policies must be based on detailed, informative scientific research. It is crucial for a Community strategy to focus on evidence based measures, and support for additional, detailed, authoritative research is needed in order to inform the strategy. Key areas include:-

- the establishment of consistent definitions of misuse, which will assist in quantifying the scale of misuse;
- analyses of the influence of risk arguments on the consumer and the best ways of communicating risk;
- recognition of the beneficial aspects of the responsible consumption of beer and a better understanding of the contribution it makes to social cohesion and the resulting benefits.

Targeting misuse

Harm minimisation measures must target the misuse

“Harm minimisation offers a constructive vehicle by which to shift the focus from consumption to consequences of use”.¹⁰

Harm is caused by harmful patterns of consumption of specific consumers. Taking account of the context in which inappropriate consumption occurs is therefore a key task for those who study the problem.

The aim of future strategies must be to target alcohol-related harm and its causes without compromising the pleasure enjoyed by the millions of people who drink responsibly. The success of any actions should then be measured by the degree to which they reduce misuse.

Educational campaigns on responsible or moderate consumption

It is vital that individuals are given appropriate information and can make informed and responsible decisions about their own levels of alcohol consumption.

In this context The Brewers of Europe fully subscribes to the emphasis that the Council put in its Conclusions of 2 December 2003 on the “essential role of education, information and communication in the critical task of motivating, and, indeed, enabling and helping the citizens to adopt more healthy lifestyles”.¹¹

We therefore would like to express our concern and surprise that the essential role that can be played by education/information is omitted from the first draft working paper on a coordinated approach in Europe to tackle alcohol-related harm.

¹⁰ Roche AM (1997). “The shifting sands of alcohol prevention: rethinking population control approaches”. Australian and New Zealand Journal of Public Health, **21** (6); 621 – 625.

¹¹ Council Conclusions on healthy lifestyles : education, information and communication. (2004/C 22/01).

Restrictive measures only aiming at a general reduction of per capita consumption will not reduce alcohol misuse

There are many studies which retrospectively demonstrate a relationship between overall level of alcohol consumption and problems and it could be tempting to consider trying to reduce everyone's drinking level in an attempt to reduce problems. There is no evidence that this is effective and it would interfere unnecessarily with people's legitimate right to drink¹².

Experts from the southern part of the EU seem to agree that the decrease in the total alcohol consumption over the last three or four decades in their country cannot be explained by the introduction of stricter alcohol control measures¹³. As regards the impact of restrictive legislation on the evolution of harmful patterns, caution is equally recommendable. One striking example in this respect is France, where although one of the most restrictive legislations in Europe was introduced in 1991, the "Loi Evin" has not been seen to impact the growing trend towards repeated episodes of heavy drinking that characterised the 12-18 population's consumption patterns throughout the nineties.¹⁴

The Brewers of Europe would therefore like to question this method, and the policies that go with it, as it is a method designed to reduce the consumption of everyone, regardless of their current level of consumption. General restrictions on beer or other more alcoholic beverages do not provide those who misuse our products with help in developing more positive behaviour patterns.

Limiting physical availability

Whilst The Brewers of Europe supports enforcement of existing national minimum purchasing age provisions, we note that other measures aimed at limiting the physical availability of alcoholic beverages have not prevented "strong (recorded and unrecorded) consumption growth"¹⁵ in countries such as Finland, Norway and Sweden since the 1950s.

Indeed, it is our view that such measures may even have a negative impact on peoples' behaviour in so far as they may encourage unnatural attitudes towards beer, including in the perception of adults who would otherwise consider responsible consumption an ordinary activity. These limitations can also lead to uncontrolled production and consumption of illegal products.

Taxation

Moderate beer drinkers should be allowed to socialise without unreasonable restrictions and at a reasonable cost.

¹² Roche AM (1997). "The shifting sands of alcohol prevention: rethinking population control approaches". Australian and New Zealand Journal of Public Health, **21** (6); 621 – 625.

¹³ Osterberg E and Karlsson T. eds (2002). "Alcohol Policies in EU Member States and Norway. A collection of country reports". Helsinki, STAKES.

¹⁴ Premier Ministre, Commissariat général du Plan, Conseil national de l'Evaluation (1999). La Loi relative à la lutte contre le tabagisme et l'alcoolisme, Rapport d'évaluation.

¹⁵ Norström T. ed (2001). "Alcohol in postwar Europe : Consumption, drinking patterns, consequences and policy responses in 15 European countries". National Institute of Public Health, Sweden – European Commission.

The Brewers of Europe strongly believes that high rates as practiced in Northern European countries have failed as an instrument to improve public health and restrict immoderate consumption. Whilst the second report of the European Commission on the rates of excise duty applied to alcoholic beverages¹⁶ states that, in one Member State (Sweden), health objectives are predominant in determining duty levels, this country continues to be characterised by the presence of a large black market and high levels of unrecorded consumption. It is the opinion of The Brewers of Europe that this is due to the negative consequences of high taxes.

We note with interest that the European Commission, in the above mentioned document, stressed that most Member States did not consider health policy considerations as influencing the level of the rates, and that in at least three high taxing countries “this has become less of an issue today than in the past”.

Lowered BAC limits

The Brewers of Europe strongly supports the views expressed by the European Commission in its Recommendation on enforcement in the field of road safety (see Part III of the present submission).

We note from both the Recommendation and the Commission’s subsequent Communication¹⁷ that “national rules are different with respect to speeding and drink-driving. With respect to the latter (maximum % of blood alcohol level), the biggest difference in rules exists between Sweden (0.02%) and the UK (0.08%). But looking at the performance of these two Member States in number of deaths per million inhabitants over the year 2000 (60 for the UK and 65 for Sweden), it appears that they were nevertheless the two best-performing countries”.

A recent analysis of research from all over the world has concluded that the level of the limit is less important than the enforcement, penalties and education messages that are associated with it. In particular, lowering the limit has not been shown to improve the road safety. This supports the views that measures should be targeted at the real problem.¹⁸

¹⁶ Report from the Commission to the Council, the European Parliament and the European Economic and Social Committee on the rates of excise duty applied on alcohol and alcoholic beverages. COM (2004) 223 final.

¹⁷ Communication from the Commission concerning Commission recommendation of 21 October 2003 on enforcement in the field of road safety. (2004/C 93/04).

¹⁸ Beirness D and Simpson H (2002). “The safety impact of lowering the BAC limit for drivers in Canada”. Traffic Injury Research Foundation.

The consumer will suffer if policies are based on misinterpretations, misquotations, misunderstandings or misrepresentations

As mentioned at the start of this chapter, any policy or action plan must be based on correct, reliable information, both in terms of research and in terms of gauging the opinions of the different stakeholders in the aim to confront the problem of misuse.

In this context we would like to draw the Commission's attention to page 9 of the Working Internal Draft, which cites an alleged quotation from the Canadean Report, when in fact neither this statement nor anything similar appears in the report.

Partnerships

What does partnership mean?

Addressing inappropriate consumption in order to tackle alcohol-related harm concerns all stakeholders involved. As a stakeholder, the industry is part of the solution, as it can help to promote responsibility.

The Brewers of Europe and its Members are ready to participate in well-targeted public-private partnerships, as already undertaken successfully in a number of key areas. For example, in the field of drinking and driving reduction strategies, the BOB campaign in Belgium was launched jointly by the Social Aspects Organisation of the Belgian Brewers Association and the Belgian Road Safety Institute. This initiative has served as a partnership model for a number of designated driver campaigns co-funded by national transport / road safety authorities and the European Commission.

For partnerships to work there must be a level playing field, where all parties have a role to play. This does not mean that each stakeholder plays the same role, but does mean that all parties can bring their specific expertise to the table.

Partnership provides wider expertise, scope and coverage

The Brewers of Europe welcomes and supports the idea to “create partnerships to help European citizens make well-informed choices about their health, and to promote their active participation in the health decision-making process”¹⁹.

A strategy to reduce the problems caused by inappropriate consumption must recognise that addressing misuse requires creating partnerships and the involvement of many different stakeholders including the different drinks sectors, social aspects organisations, local communities, educational institutions, road safety agencies etc.

¹⁹ “Partnerships for Health for Europe” (2004). Non Paper, European Commission, Health & Consumer Protection Directorate-General, Directorate C – Public Health and Risk Assessment.

PART THREE AREAS FOR ACTION ON TARGETING MISUSE

The Brewers' position, Current good practice, Partnership development

Introduction

In its first draft working paper on a coordinated approach in Europe to tackle alcohol-related harm, the Commission has identified seven key areas for action. The Brewers of Europe is surprised that, although the Commission notes the need to initiate, promote and encourage transparent and independent research that addresses the determinants and consequences of alcohol consumption, the corresponding proposed action ranks last in the list of key areas. We believe that only on the basis of all the evidence should policy options be envisaged. This is why we strongly suggest that the need for more research be placed at the top of the list of key actions.

The Brewers of Europe and its Members play an important role in raising awareness of the implications of inappropriate consumption and we have a proven record of achievement in initiatives to combat misuse. These include the active support provided to the [European Research Advisory Board](#) (ERAB), a European independent platform promoting research excellence, building upon the positive contribution that the [Alcohol Beverage Medical Research Foundation](#) (ABMRF) has made to the research in Northern America for decades.

Brewers also play a leading role in and commit significant financial investment to a growing number of social responsibility initiatives, either individually as brewers, by subscribing to trade associations and their confederations or by funding Social Aspects Organisations and their international affiliates. The majority of Europe's and the world's brewers actively participate in many of these initiatives, particularly those run by brewing trade associations.

In 2003, the Worldwide Brewing Alliance, composed of The Brewers of Europe, The British Beer & Pub Association, the Australian Associated Brewers, the USA Beer Institute, the Beer, Wine and Spirits Council of New Zealand, and The Brewers of Canada, put together [The Global Social Responsibility Initiatives](#). This document demonstrates the efforts made by the brewing industry worldwide to ensure its products are used responsibly, through more than 360 initiatives from 34 different countries.

The diversity of the initiatives listed recognises the cultural and legal differences that we know exist from place to place. This shows the need to tailor activity to local needs and underlines the fact that initiatives cannot be translated easily from one country to another.

Another feature is the range and variety of partnerships with other agencies that are described. Partnership provides an extra dimension for industry initiatives, affording them wider expertise, knowledge, scope and coverage.

Many of the initiatives described have been running now for many years and, building on this experience, an increasing number now incorporate evaluation programmes to measure the effectiveness of their message.

1. Exchange of information, data and research

The Brewers' position

With reference to the aim of the Commission to present comparable data on alcohol consumption, the effects of alcohol and of alcohol policy measures, The Brewers of Europe believes that the need for more research should be placed at the top of the list of key actions because it is the most important. Without reliable, independent, scientific, peer-reviewed evidence to justify it, no policy should be implemented.

At the moment, for every piece of evidence advocating one policy, there is a wealth of evidence that would seem to advocate an opposite policy, or at least that seriously puts into doubts the conclusions.

In addition, we would like to stress that a lot of research is already carried out, but not in all countries, creating an imbalance. It is essential that policy is not based on research carried out on a different country with a very different drinking environment. In reference to chapter two of the book *Alcohol: No ordinary commodity* by Babor et al, Professor Karl Mann observes that “the old Anglo-Saxon Protestant School of thinking is still over-represented, whereas the Central European and Mediterranean Catholic way of thinking plays a very minor role. This is reflected additionally by the choice of references in this book. (...) it will be of crucial importance to operate from a broader base of research results.”²⁰

For these reasons there is a need for more reliable research into the nature of misuse and a need for a review of all the evidence. Only on the basis of clear evidence should policy be put into action.

Current good practice

The Brewers of Europe supports the Research community's efforts to develop the evidence base.

In 2003 the European Research Advisory Board (ERAB) was established as an independent foundation under Belgian law to fund bio-medical and psychological research into beer and alcohol. The ERAB is funded by, but independent of, the brewing industry.

This important initiative is supported by The Brewers of Europe, who shares the independent research community's concern over the lack of factual information about the health and behavioural effects of alcohol for the vast majority of consumers who drink in moderation.

The mission of the ERAB:

- To provide the scientific community, the decision makers and the stakeholders with a better understanding of the bio-medical and socio-behavioural effects of alcohol;
- To provide the scientific basis for the prevention and treatment of alcohol misuse;
- To fund innovative, high quality research;
- To support promising new researchers;

²⁰ Mann K. (2003). “Beyond convictions, toward science and hope of a broader literature base. Comment on Chapter 2: *Alcohol: No Ordinary Commodity*” in “*Alcohol: No Ordinary Commodity - Research and Public Policy*. A Summary of Babor et al (2003) and an international debate around it.” *Addiction* 98, 1341-1370.

- To communicate credible information effectively with the research community and other interested parties;
- To be a platform of excellence in European independent research.

Funding of between 0.4 and 0.5 million euros per year for an initial period of three years has been pledged by the Members of The Brewers of Europe and some of the major European brewing companies.

The ERAB has been set up with two Boards:

- The Board of Directors (effectively trustees) - a highly reputed governing body whose role will be to administer the fund. This Board includes some representatives from the brewing industry, but according to the by-laws, these are in the minority to ensure the independence of the Foundation; other Members include representatives of the academic world and the civil society.
- The Advisory Board - composed of eight distinguished independent scientists from different European countries, whose role is to advise on the research that should be funded, by carrying out a detailed peer review of all applications.

Partnership development

In order for all parties to be effective stakeholders and reduce the problems associated with alcohol misuse, exchange of reliable, independent, scientific information, data and research is key.

The Brewers of Europe will continue to support all efforts produced by the research community at large to further investigate the effects of alcoholic beverage and beer consumption on behaviour and health.

In 2004, the European Research Advisory Board has funded 6 research projects, which will cover such alcoholic beverage misuse related problems as cancers, atherosclerosis, liver disease, alcohol-nicotine co-dependence and adolescent alcohol use.

The ERAB has already committed to funding further projects in 2005, with the aim of increasing over the time the amount of high quality, reliable research into the effects of the abuse of our products.

The ERAB will:-

- require recognition of its status as a European platform of research excellence;
- explore opportunities to work together and form partnerships with DG Research.

2. Drinking and driving

The Brewers' position

With reference to the aim of the Commission to decrease the number of alcohol-related accidents, The Brewers of Europe wishes to express its strong opposition to drinking and driving, and full support to measures and initiatives targeted at the problem. The brewing industry recognises the role it can play in deterring drivers from drink driving and has therefore taken a leading role in developing and co-funding initiatives and campaigns designed to deter people from drinking and driving. Drink drive campaigning is an example of an effective targeted harm minimisation technique.

It is essential that rules are enforced and that breaches thereof are sanctioned, and The Brewers of Europe supports active enforcement of existing laws. It is equally crucial that awareness campaigns and initiatives discourage people drinking and driving. The Brewers of Europe fully concurs with the Commission's view, as expressed in the Commission Recommendation on enforcement in the field of road safety²¹ of 22nd October 2003, that enforcement proves more efficient if combined with information to the public.

Current good practice

The [Worldwide Brewing Alliance Report](#) provides national updates on the subject of drinking and driving. The 2003 Edition was made publicly available on the occasion of World Health Day 2004 on Road Safety. The report shows:-

- the magnitude of brewers' activity in this area;
- that many campaigns are carried out in partnership with governmental and non-governmental organisations;
- the diversity of legislation, penalties and enforcement;
- that, despite all the laws in place, there is still a contingent of drivers who repeatedly drive when intoxicated;
- that the numbers of people drinking and driving are declining almost everywhere;
- that there has been a very significant downward trend, over the past 15 years, in alcohol-related accidents, casualties and fatalities.

Several factors are likely to have contributed to these improvements. They include:-

- increased public awareness, partly facilitated by the commitment of the brewing industry and efforts in the retail sector;
- proper enforcement of existing laws;
- safer vehicles;
- increased individual responsibility.

Numerous campaigns supported by the brewing industry are currently running across Europe. Designated driver campaigns, educational videos, driving tests for young people, advertising campaigns, internet games and driving simulators are examples of a wealth of schemes that are developed in partnership with and often co-funded by authorities including the European Commission, national transport ministries and road safety institutes, and a variety of key stakeholders such as driving schools and automobile clubs.

²¹ 2004/345/EC

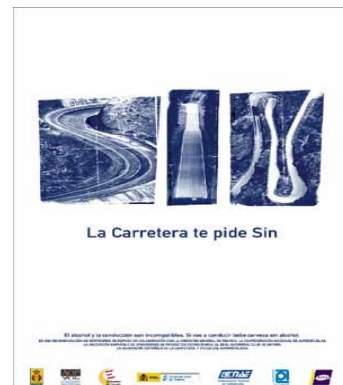
Examples of Best practice



Based on the designated driver concept, the BOB campaign was launched in 1995 jointly by The Group Arnoldus (the Social Aspects Organisation of the Belgian Brewers Association) and the Belgian Road Safety Institute (IBSR) to help make people aware of the dangers of drinking and driving. There has been a measurable reduction in fatalities during the period that the campaign has been running (down 17% between 1994 and 1998), which cannot be put down to other measures. The public show good awareness of the campaign (97% in 2002) and many have been a designated driver (36% in 2001) or been driven by one (43% in 2001). In 2001 the European Commission (DG

TREN) announced that it would co-finance a Euro-BOB campaign in several countries in a move to share this good practice across Europe. This co-funding has continued and, in 2003, 8 countries participated. The Brewers of Europe actively supports the efforts produced by the IBSR, The Arnoldus Group, The Amsterdam Group, the transport services of the European Commission, national authorities and trade associations, to ensure the continuation of this European initiative, which now involves the other drinks sectors.

Brewers also had an active participation in the European Road Safety Charter with the Brewers of Spain being among the first wave of signatories of this Charter with the "La Carretera te pide sin" (The Road requires you alcohol free) campaign. The message is that drinking and driving are two activities that are not compatible. The campaign is run in close partnership with the National Traffic Authority, the Spanish Association of Oil operators, the National Federation of Driving Schools, the Royal Motor Club of Spain, the Royal Motor Club of Catalonia, the Technical Institute Foundation for Safe Vehicles, the Spanish Highway Association and the National Breakdown Service Organisation. Posters exhibited in petrol stations and driving schools, key rings, press and outdoor advertisements, and free postcards are some of the materials involved.



Many brewing companies now put their brand name to anti-drink driving campaigns. The companies are able to use their experience in marketing and knowledge of the consumers to reach them with clear messages that the company does not want its product to be misused.



In Italy, Heineken produced their 'Pensaci' (Think about it) advertising campaign, which encouraged consumers to think about the potential risks, related to drinking and driving, for themselves and others.

Partnership development

The Brewers of Europe will:-

- continue to support strict enforcement of existing road safety legislation;
- continue to encourage its Members to support, in partnership with the relevant public bodies and other stakeholders, initiatives designed to discourage drinking and driving across Europe;
- further support the efforts produced by its Members, The Amsterdam Group, the European Commission transport services and the national road safety bodies, to expand designated driver campaigns into the enlarged Europe;
- encourage the development of evaluation schemes where needed;
- continue to share the Worldwide Brewing Alliance Report on Drinking and Driving with the World Health Organisation and the European Commission.

3. Drinking by minors under the legal age

The Brewers' position

With reference to the aim of the Commission to postpone the age at which children and adolescents start to drink alcohol, and to reduce under-age drinking, especially binge drinking, The Brewers of Europe shares the concern that in a number of countries, there is a big problem of drinking (and binge-drinking) by minors under the legal age. We therefore strongly oppose the sale of beer to minors under the legal age. We support all effective measures and initiatives to tackle the problem, particularly in countries where it is gravest. Young people are a particularly vulnerable group because of social and peer pressures, often vehicled by a range of different media, including public broadcast, and many will want to try alcoholic beverages as they see these as part of growing up.

Codes of practice throughout Europe and The Brewers of Europe Guidelines for Responsible Commercial Communications prohibit commercial communications about beer being aimed at minors or showing minors drinking²². The Brewers of Europe also strongly believes in the role of information, education and dialogue and supports all efforts to raise awareness of the dangers of alcohol misuse.

In order to develop effective programmes to help inform young people about the dangers of alcohol misuse, more research is needed to understand their attitudes towards beer and other alcoholic beverages in relation to enjoyment, lifestyles and rites of passage into the adult world, taking into account as a key parameter the variety of drinking cultures. The role of the family and schools is of primary importance in this regard. In a country of the world where individuals' environment is commonly characterised as being surrounded by advertising, the Roper Youth Report²³ shows that among six categories of people or things that might affect their decisions about drinking, 69 percent of American youth (aged 13-17) identified their parents as bearing a leading influence as against best friends (33%), teachers (21%), television (13%), siblings (10 percent) and advertisements (8%)²⁴. It is also important that authorities, at national, regional and local level, and the industry work together to educate and inform young people about the implications of drinking and misuse of beer and other alcoholic beverages. This includes active support by the brewing industry of schemes aimed at helping enforce the existing legislations prohibiting sales of alcoholic drinks to young people under the legal age.

Culturally, individual countries have widely differing views on when young people should be allowed to drink alcohol. There is a difference, however, between access to drink in a domestic situation, and allowing young people to purchase alcohol in an on or off-premise and drink it in public in an on-premise. The legislatures of countries control access to alcohol by young people by setting minimum ages for those buying and drinking it. Most countries prevent anyone under 18 from drinking alcoholic beverages in an on-premise although a significant minority let 16 year olds do so. There is a general desire, however, to limit their drinking to wine and beer as there are few cases where a 16 year old can drink spirits in an on-premise²⁵.

²² Canadean Limited (2002). « Responsible Marketing of Alcoholic Drinks : Regulations and Enforcement – An Overview of the Regulatory Environment for Commercial Communication of Alcoholic Beverages in Europe ».

²³ Roper Youth Report (2003). A nationwide cross-section syndicated survey of 544 8-17 year-olds. Based on responses of 13-17 year-olds (n=266). Question 9 – “Many times we get ideas from what other people say and do. I am going to read a list of some different things and ask you which people or things, besides yourself, have influenced you the most in that particular area...whether you drink alcohol or not.”

²⁴ Idem. One percent of 13-17 year old respondent chose advertising as the one thing influencing them the most in whether they drink alcohol or not.

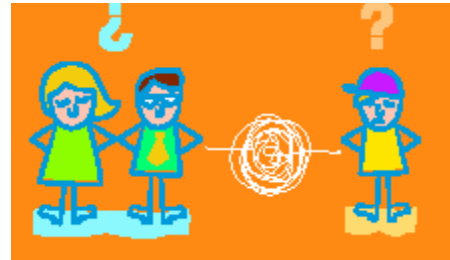
²⁵ Idem.

Current good practice

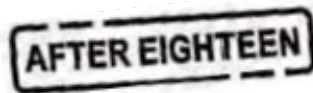
Across the enlarged Europe, brewers have and are putting into place comprehensive self-regulatory mechanisms, which include stringent codes for commercial communications to ensure that communications are not targeted at young people under the legal age (See Section 4 on Commercial Communications).

European brewers, either individually, by subscribing to trade associations or by funding Social Aspects Organisations, have engaged for years in many social responsibility initiatives. Amongst these, a large number of programmes address young people specifically. These include teacher packages for schools, youth club schemes, initiatives to discourage drinking by minors below the legal drinking age, college programmes and help for parents wanting to discuss the issues with their children.

“Los padres tienen la palabra” is a new initiative funded by Cerveceros de España (The Brewers of Spain). It offers parents a guidebook that encourages open and honest communication between parents and children and aims to help prevent underage drinking. The guidebook was written by Dr. Petra M. Pérez, Director of the Institute for Creativity and Innovative Education, Valencia University.

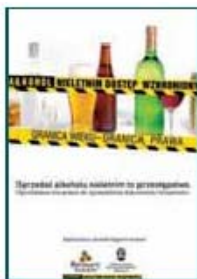


This example recognises the essential role of parents in informing and educating their children about the implications of alcohol consumption.



“After Eighteen” is a scholarship programme launched by the Finnish Federation of the Brewing and Soft Drinks Industry together with Nuorten Akatemia (Youth Academy) to financially support actions aimed at the prevention or reduction of alcohol consumption by under 18s. Awards have been presented each year. In 2004 six schools received prizes. Two schools were granted the highest grade for their plans proposing an action-oriented, long-term approach in which the pupils play a leading role and parents are also actively involved. The best programmes were selected by a jury including representatives of the above mentioned organisations, teachers and pupils. Details on the awards will be available in the Autumn of 2004 on the Youth Academy’s website at <http://www.nuortenakatemia.fi>

This example illustrates the contribution that the brewing industry can make to programmes run in cooperation with youth organisations at local level, with the aim to encourage schools and young people to work together on projects to prevent underage drinking.



“Alcohol-Underage No Access – Age limits are legal limits” is a campaign run on behalf of the Polish Brewers Union and the State Agency for Prevention of Alcohol Problems.

This national initiative targets retailers of alcoholic drinks and calls them to respect the law and ask for proof of age.

Materials include promotional and educational point of sale material, backed up by nationwide media coverage on television, radio and billboards.

This example shows that the industry and governmental agencies can co-operate with a view to ensuring that legal age provisions are properly and effectively enforced on the ground.

Partnership development

Schemes that encourage open communication between parents and children, with a view to helping prevent underage drinking, are increasingly being used in countries across Europe, taking into account the different cultures.

The Brewers of Europe will:-

- encourage exchange of best practice in the field of initiatives aiming to prevent underage drinking;
- continue to report to the Commission on best practice in the field of self-regulation for commercial communications for beer, particularly in respect of code provisions designed to protect young people under the legal age;
- continue to support schemes involving educators, governmental agencies, youth organisations, social aspect organisations and other stakeholders;
- continue to support any action that strengthens the enforcement of existing laws designed to protect young people.

4. Commercial communications

The Brewers' position

With reference to the aim of the Commission to stop exposure of commercial communications to young people and promotions that encourages excessive and harmful use of alcohol, The Brewers of Europe would like to emphasise that across Europe the brewing industry already has and follows strict code provisions designed to protect minors and to prevent commercial communications that encourage excessive or irresponsible consumption.

Promoting responsible consumption and not encouraging irresponsible behaviour are essential principles on the basis of which the brewing industry actively campaigns to help make self-regulation of commercial communications for beer even more effective. Whilst occasional mistakes attract a great deal of attention, there are in fact a relatively limited number of complaints about advertisements for alcoholic drinks.

The brewing industry can demonstrate its ability to conduct its business responsibly, through self-regulation of its commercial communications and the active promotion of the highest ethical standards. Effective self-regulation enhances corporate social responsibility.

The duty of responsibility is shared by all the agencies and ancillary services involved in producing commercial communications of all kinds.

The consumer too has a responsibility and must be encouraged to treat our products with respect and consume them in moderation.

Effective self-regulation can ensure that commercial communications are targeted at people above the legal drinking age and that they do not encourage excessive or irresponsible drinking. However, it is unrealistic to expect self-regulation on its own to solve social problems related to public health, such as underage drinking or alcohol misuse.

Current good practice

In 2002 The Brewers of Europe commissioned an independent report as part of their response to the Commission's request to produce a review of self-regulatory mechanisms with regard to commercial communication in an enlarged EU. A second Canadian Report is currently being produced to focus on the regulatory and self-regulatory environment in different European countries, and will be available in November 2004.

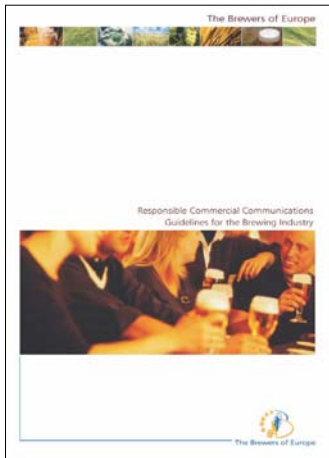
Our industry has a proven record of achievements with respect to improving self-regulation of commercial communications for beer.

As brewing companies grow and start to operate in a number of countries they will find that the regulations governing commercial communications vary from place to place and what might be allowed in one country contravenes local regulations in another. Taking account of these variations and responding to a growing sense of social responsibility, larger brewing companies are setting out corporate alcohol policies that apply to all parts of the organisation and include internal codes on marketing and other forms of commercial communications.

In addition to the work performed by self-regulatory organisations, social aspects organisations and the companies themselves, national Member Associations of The Brewers of Europe play an important part in securing best practice. The work goes beyond adopting self-regulatory rules, be they beer specific, multi-sectorial, company codes or national guidelines. The Brewers of Europe provides its Members with information and training tools aimed at ensuring effective compliance.

The Brewers of Europe has regularly reported to the Commission in the context of the DG SANCO Stakeholders dialogue on the work of its Members in relation to the above.

Encouraging best practice



*The Brewers of Europe has produced **Guidelines for Commercial Communications for Beer**, which are intended to serve as common standards throughout Europe.*

They are not meant to replace existing national self-regulation systems or to be limited to brewers, but rather to be incorporated into national systems where these already exist, or to fill in the gaps where necessary.

Where no national system exists, and where a wider self-regulatory system for the whole alcoholic drinks industry, such as The Amsterdam Group Common Standards, is not practicable, these guidelines provide an element of consistency to enable the brewing industry to regulate itself.

*In 2004 The Brewers of Europe developed a **Manual** for the interpretation of the above mentioned Guidelines, to help Members and associations in a number of the new EU Member States assist self-regulatory bodies and companies in optimising the effectiveness of the self-regulatory processes. This initiative will be supplemented by a best practice sharing seminar designed for associations and companies in particular in the new countries.*

Partnership development

The Brewers of Europe will:-

- share the second edition of the Canadian Report with the Commission and the public (November 2004). It is anticipated that this document will provide the Commission with updated/detailed information on the self-regulation of commercial communications for alcoholic beverages across the enlarged Europe, particularly in view of the Commission report on the implementation of the Council Recommendation on the Drinking by Young People;
- continue to update the Commission and other stakeholders on the efforts pursued by the brewing community in further ensuring that commercial communications for beer do not target young people under the legal age and that they do not encourage excessive or irresponsible drinking;
- continue to share its expertise and knowledge with brewers associations in the new enlargement countries and candidate countries. This has already been done with the above-mentioned commercial communications guidelines and manual and will continue to be done through workshops and extending our links with all brewers across the enlarged Europe.

5. Consumer information

The Brewers' position

With reference to the aim of the Commission to improve consumer awareness, The Brewers of Europe recognises the importance of clear information, empowering the consumers by enabling them to know what they are drinking, what effects the beverage may have, and to understand the consequences of harmful patterns such as binge drinking.

In this respect The Brewers of Europe is committed to ensuring that beer labelling does not create any confusion as to the nature and strength of beer.

Promoting awareness

The Brewers of Europe is of the firm opinion that informing and educating people about responsible alcohol consumption can contribute to help reduce alcohol misuse in the long term. Hence the need to continue to develop campaigns encouraging responsible consumption and promoting awareness about the dangers of excessive consumption.

The Brewers of Europe also recognises the need to further develop and improve schemes aimed to make consumers aware of the self-regulatory process and the role that the consumer can play in this process.

Ingredient labelling

The Brewers of Europe agree that ingredient listing should be applied to beer broadly in accordance with the requirements of the Food Labelling Directive (2000/13/EC) from which there is a current derogation for products with alcohol content greater than 1.2%.

Health warnings

Health warning labels placed on beer packaging have not been shown to deter the minority who misuse the product. Research has failed to demonstrate a change in drinking behaviour as a result of exposure to warning labels^{26,27 28} and in particular has not shown that warning labels are effective in preventing alcohol consumption by heavy drinkers²⁹, or irresponsible consumption by pregnant women³⁰. In addition, health warning labels may deter moderate drinkers from obtaining certain health benefits from sensible drinking.

²⁶ Grube J.W. and Nygaard P. (2001). «Adolescent drinking and alcohol policy». Contemporary Drug Problems, 28: 87-131.

²⁷ Agostinelli G. and Grube J. (2002). "Alcohol counter-advertising and the media: A review of recent research". Alcohol Research and Health, 26: 15-21.

²⁸ See also WHO (2004). "Global Status Report: Alcohol Policy". 62.

²⁹ Andrews J.C. (1995). «Effectiveness of alcohol warning labels: A review and extension». American Behavioral Scientist, 38: 622-32.

³⁰ Hankin JR, Firestone IJ, Sloan JJ et al. (1996). "Heeding the Alcoholic Beverage Warning Label during pregnancy : Multiparae versus Nulliparae". Journal of Studies of Alcohol, 57:171-177.

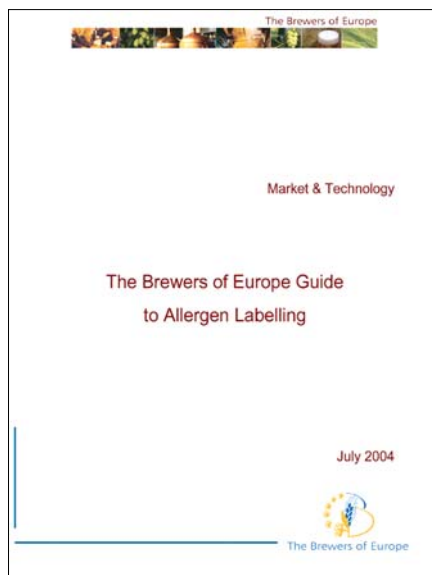
Current good practice

Across Europe the brewing community has engaged in programmes and initiatives aimed at encouraging responsible and moderate consumption and providing the public with information about the dangers of excessive consumption. A growing number of programmes make use of the new information technologies since these have become accessible to the wider population (see best practice example below). Several programmes supported by the brewing industry are designed to provide advice and information to specific groups including pregnant women, young people and parents.

Voluntary messages that recommend responsible consumption are also instruments which form part of the self-regulatory initiatives in some European countries, either across the drinks sectors (Portugal, The Netherlands) or applying to beer specifically (Belgium, Spain). The media (TV, radio, cinema, press) used as support for these messages may vary from country to country. In each country detailed self-regulatory provisions include prescriptions in respect to how the message should be placed.

As part of corporate social responsibility schemes, responsible consumption advertisements linked to a brand are developed today by a growing number of large brewing companies. This is particularly the case for anti-drink drive messaging.

Examples of best practice



The Brewers of Europe Guide to Allergen Labelling is designed to assist breweries in providing uniform and meaningful labelling information to consumers who may need to be alerted to the presence of certain substances in food. The guidelines are recommendations to brewers to assist them in ensuring that consumers are given information in a helpful and consistent manner. Directive 2000/13/EC, as amended by Directive 2003/85/EC, lays down a list of ingredients, specified in Annex IIIa, which must be labelled whenever they are used, i.e. intentionally added, in the production of foodstuffs, and beverages containing more than 1.2% alcohol by volume. Directive 2003/89/EC specifies the word “contains” in the different EU languages, but gives no further guidance on how to declare allergenic ingredients or their derivatives on the label. The Guidelines therefore recommend a consistent approach to the presentation of allergen information, to help allergy sufferers.

www.beerandhealth.com is an initiative of the Belgian Brewers aimed at informing the public on the results of international scientific research into the effects of moderate beer consumption on health. In addition to current scientific studies on beer consumption and health, the site includes specific dossiers, interviews with health experts and a diary of events on the subject of alcoholic beverages and health. Visitors may subscribe free of charge to a monthly newsletter keeping them informed of interesting developments in the above-mentioned areas and of all site updates. A Q&A section allows visitors to put questions to an expert and to receive the answer either through the website or on their personal email address.



Partnership development

The Brewers of Europe:-

- will continue to inform the Commission on the European brewing initiatives aimed at ensuring that consumers are informed about both the positive effects of moderate beer consumption and the dangers of excessive consumption;
- will continue to improve consumer awareness of the self-regulation process and its mechanisms;
- will pursue its close collaboration with the relevant Commission services in the field of ingredient labelling.

6. Availability of alcoholic beverages

The Brewers' position

With reference to the aims of the Commission to reduce harmful use of alcohol by increasing the minimum rates of excise duties, and to decrease smuggling and fraud, The Brewers of Europe:-

- notes that in most Member States health policy considerations do not influence the level of the rates and only in one Member State (Sweden) are health objectives predominant in determining the duty levels;
- strongly believes that high rates as practiced in Northern European countries have failed as an instrument to improve public health and restrict immoderate consumption;
- whilst supporting the quest to decrease smuggling and fraud related to cross border alcohol trade and transport, observes in these high taxing countries the presence of large black markets and high levels of unrecorded consumption, which is precisely due, from our point of view, to the high taxes.

The European brewing industry supports all efforts aimed at:-

- developing and improving the server training schemes across Europe, taking into account local requirements;
- encouraging the off-trade to take initiatives aimed at reducing the likelihood of the products being misused, such as responsible promotions, better designed premises and well trained staff. The Brewers of Europe works with HOTREC to promote national initiatives in this field.

Current good practice

Across Europe the brewing industry actively supports and co-funds partnership schemes that focus on training for managers and staff serving alcoholic drinks to help them prevent problem situations.

Example of Best Practice



“Eerst denken, dan schenken” (“Think before you serve”) is a training video for professional servers of alcoholic beverages in the Netherlands. 15,000 copies have been produced under the authority of the Dutch Ministry of Health, Welfare and Sports, employer organisations and unions associated with the hospitality industry by SVH, the Dutch Hospitality Education Institute. It is based on the regulations stipulated by the Licensing and Catering Act and gives practical advice on how alcohol consumption can be limited when it is not desired or consumption is irresponsible. Subjects covered include the prevention of alcohol abuse, refusing drunken guests, admission to the premises, refusing sales to underage purchasers, dealing with rounds of drinks, and preventing drink driving. The video is available in English.

Partnership development

The Brewers of Europe and its Members:-

- will further encourage the development of server-training schemes to help those responsible for selling the products address issues related to excessive consumption, disorderly behaviour and prevention of sales to minors;
- where needed, will promote co-operation with the retailers to ensure that all staff employed at point of sale understand the principles of the codes that they must work to.

7. Protection of third parties, especially families and children

The Brewers' position

With reference to the aim of the Commission to reduce violence in families with alcohol-related problems, decrease risk of health and behaviour problems for all members of the society and support preventive activities on workplaces, schools, family centres etc., The Brewers of Europe shares the Commission's and other stakeholders' concerns in relation to the harm that can be caused by a minority of heavy drinkers to their families, in particular children, or any other individuals who may suffer directly or indirectly (also through damage to public property) from such behaviour.

Qualifying or quantifying the harm caused to third parties in this respect is extremely difficult because in most cases the problems are intrinsically linked with a wide spectrum of parameters ranging from psychological wounds, family history, social status, stress at work, education, living in economically disadvantaged regions etc. The Brewers of Europe and its Members strongly support initiatives aimed at reducing anti-social behaviour and helping those who have problems to neither harm themselves nor others. The Brewers of Europe also supports ensuring that law enforcers have adequate powers to act when harm may be caused to third parties, especially families and children.

Current good practice

Across Europe the brewing industry is involved in initiatives that include:-

- training on social norming and design of premises to minimise the possibility of anti-social behaviour;
- partnerships with local crime and disorder bodies as well as communications aimed at both servers and customers.

Brewing companies were some of the first to recognise the potential problems of alcohol consumption in the workplace and most companies have well developed alcohol policies.

Brewers have also formed partnerships to improve the safety in the drinking environment where, in the UK for example, there are many premises that only serve drinks in plastic bottles or in safer glasses on certain occasions.

Example of best practice



The "Crime and Disorder Partnerships Initiative" involves members of the British Beer & Pub Association, local authorities and the police in finding local solutions to local issues via the Government Crime and Disorder Partnerships in England and Wales. The partnership enables material to be widely disseminated. A "Helping to Reduce Crime and Disorder" leaflet explains the initiative and cites examples of effective crime reduction strategies. This has been produced in association with the Home Office.

Partnership development

The Brewers of Europe and its Members stand ready to share best practice with the Commission in the above mentioned areas.

Conclusion

The Brewers of Europe shares the concerns expressed by the Council regarding misuse and welcomes the Commission's efforts to combat the issue. We recognise that there are problems and consider that these must be addressed, in partnership.

Europe is a cultural and societal patchwork. Any initiative or measure taken at the appropriate level must take fully into account the diversity of economies, societies, cultures and traditions across the enlarged European Union.

We believe that any solution to the problems must be based on all the evidence. This is why The Brewers of Europe strongly supports research across Europe into the effects of beer and alcohol on behaviour and health.

It is our conviction that education is at the heart of the equation.

The European brewing industry will continue to be part of the solution.