



A Second Submission

Comments on the DG SANCO informal draft discussion paper on the EU Strategy on Alcohol as was presented at the Alcohol & Health Working Group meeting, held on 7th and 8th March 2005

September 2005

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“Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.”

First principle, Constitution of the World Health Organisation

“Because make no mistake, without using another drop of ink, or without drafting another line of legislation – we could make a significant impact on the issue of alcohol and youth. Indeed we could change the context of this debate if the existing alcohol control laws were rigidly enforced – from drink-driving controls, to minimum age requirements. We could make a real start through effective enforcement (...) You may be aware that Sweden has defined its Presidency of the European Union as the three “E”s: Enlargement, Employment, and Environment. Let me borrow this motif to summarise my key message on delivering change on Alcohol and Youth as the three “E”s: enforcement – enforcement – and more enforcement.”

**David Byrne, European Commissioner
for Health and Consumer Protection (1999-2004)
Young People and Alcohol Conference,
Stockholm, 21 February 2001**

Introduction

On 23rd May 2005, the DG SANCO services publicised the informal draft paper they had prepared in advance of an alcohol & health working group meeting that was held on 7th and 8th March.

The informal draft paper focuses on 8 possible key areas for action. Whilst 7 amongst these had already been identified in the first draft working paper, we note that each of the relevant sections was subject to revision and that a new area related to brief interventions was introduced.

The comments here below therefore take account of the new elements found in the DG SANCO informal draft paper. They also should be considered in the light of our First Submission¹ and subsequent documents^{2, 3, 4}. Comments on each single measure suggested can be found in the annex.

In order to avoid unnecessary repetitions, the present document does not include the references to scientific evidence that were already indicated in our previous positions.

¹ [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.

² [Some Additional Comments and Reflections](#) - A Supplement to a First Submission - March 2005.

³ [An Abridged Version of a First Submission](#) - March 2005.

⁴ [Comments](#), posted on the European Commission's public health website, on the scientific and policy issues discussed at the Stakeholders' workshop held on 20 January 2005 in relation to the forthcoming report on the health, social and economic impact of alcohol.

General Comments

1. The Brewers of Europe appreciates the three essential points made by DG SANCO in its introduction and confirms its full support for the view that:-
 - areas, aims and actions should be assessed in the light of their relevance and potential to contribute to reducing harm;
 - any solution to the problems must be based on all the evidence;
 - any strategy should take full account of the cultural diversity that characterises Europe.

In addition, we would like to emphasise the importance of full impact assessments being carried out before any policies be implemented.

2. When searching for and discussing potential action areas, DG SANCO should take account of the work already being done by other Commission services.
3. Due note must be taken of the fact that across Europe the majority of the millions of adults who drink beer do so without causing themselves or others any harm and that moderate beer consumption can form part of a healthy lifestyle. There is convincing evidence that moderate consumption of alcoholic beverages reduces the risk of coronary heart disease and evidence is building of a beneficial effect in a number of other conditions. 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. We therefore regret to note that in many areas, DG SANCO continues to support an approach that we have already criticised as being ill-inspired by considerations focused on the reduction of total consumption rather than the reduction of the problems caused by the inappropriate consumption of our products.
5. We fully endorse the consideration given to brief interventions and would like to see this crucial area for action being put, together with effective educational programs and good research, at the forefront of any strategy to tackle alcohol misuse.
6. There needs to be more research into people's behaviours, to explain why some people are drinking irresponsibly, why some young people see drunkenness as a rite of passage, and why this is socially acceptable in some cultures. Solutions can only be found once the real problem is identified, and certain cultures of attitudes may then change, in order to reduce misuse.

7. The Brewers of Europe understands that by “beverage alcohol industry”, DG SANCO means not only producers of alcoholic beverages, but also the hospitality sector and the retail sector at large. However, we take this opportunity to point out that the comments here below are made exclusively on behalf of the European brewers, and that the influence of brewers on the hospitality and retail sectors is limited.
8. We regret to note that producers of alcoholic beverages continue to be confined, perhaps to an even greater degree than in the DG SANCO first draft working paper, to an implementing party’s role. We believe that this approach neglects the great potential of stakeholder partnership in tackling problems.
9. When assigning roles to non-governmental organisations, DG SANCO should consider which NGOs are being designated which tasks, since single issue NGOs are often very one-sided. NGOs that are purportedly closer to the consumer need to take their responsibility and represent the wishes of consumers. The NGOs can have a major role to play, regarding the educational process for example, but this role needs to be clearly defined.

1. Drinking and driving

General Observations

The Brewers of Europe supports the view that all stakeholders can play an active role, in partnership, to help achieve a substantial reduction in alcohol-related road fatalities and injuries across Europe.

We would like to stress that enforcement actions can only be optimally effective if they are combined with actions to make the public aware of such enforcement actions and the reasons why they are being carried out. Indeed, this exact point is clearly mentioned in the Commission Recommendation of 6 April 2004⁵ on enforcement in the field of road safety. For the sake of clarity and consistency, any final proposals on tackling drinking and driving should therefore expressly refer to this Commission Recommendation.

In this context, The Brewers of Europe is very satisfied with the considerable amount of work that has already been done in the field of drinking and driving, under the auspices of the Commission's Directorate-General for Transport and Energy.

With reference to the suggestion that a Council Recommendation on drink-driving countermeasures should include low blood alcohol concentration levels, The Brewers of Europe draws again the attention of DG SANCO to the fact that the actual numerical value of the BAC limits that exist across the EU is of relatively little importance compared to the policies and campaigns that have been implemented to support them. Indeed, as shown by a recent, comprehensive analysis of research from all over the world, the level of the BAC limit is less important than the enforcement, penalties and education messages that are associated with it. In particular, lowering the BAC limit has not been shown to address the real problem, i.e. the remaining contingent of drivers who repeatedly drive when intoxicated.

Other measures such as random breath testing, high enforcement and treatment programmes for repeat offenders should indeed be strongly encouraged.

We also support the suggestion that Member States should support research and projects on effective measures, including for example breath alcohol ignition interlock devices, the efficacy of which, as a method for limiting driving opportunities of repeat offenders, has been demonstrated.

⁵ 2004/345/EC

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should support effective drink-driving countermeasures and demonstrate responsible business activities, The Brewers of Europe wishes to recall the crucial part that the European brewing sector has played for many years in facilitating increased public awareness of the dangers inherent to drinking and driving.^{6, 7}

Our Members have in many respects acted as pioneers in this area, to the extent that the current campaigns co-funded by the European Commission have today reached an unprecedented coverage. Based on the designated driver concept, the BOB campaign was launched in 1995 by the Arnoldus Group (the Social Aspects Organisation of the Belgian Brewers' Association) and the Belgian Road Safety Institute (BIVV-IBSR). In 2001 the European Commission (DG TREN) decided to co-finance a Euro-BOB campaign in several countries in a move to share this good practice. This successful project is still running and continues to be extended to even more European countries.

Whilst designated driver schemes form now part of many national traditions, other successful initiatives aimed at enhancing individual responsibility have been developed in partnership with national authorities and other relevant stakeholders. An illustration of the brewing sector's commitment to alternative projects is the Spanish brewers' sponsored *La Carretera te pide sin* campaign, which focuses on the clear message that drinking and driving are two activities that are not compatible, and as part of a wider message regarding responsible consumption. This campaign received the European Road Safety Charter label.

With reference to the suggestion that the beverage alcohol industry should contribute to a central and independently managed fund for "Europe against drink-driving" mobilisation, The Brewers of Europe wishes to recall that there are already European partnership initiatives under the auspices of the Commission's Transport and Energy Directorate-General, including the co-funding of the now famous "*Euro-Bob*" campaign and the platform provided by the European Road Safety Charter. We would therefore strongly recommend that any direct duplication of existing successful schemes be avoided, and that the focus of any further action be on encouraging the sharing of best practice and enhancing national initiatives.

⁶ [Worldwide Brewing Alliance Global Social Responsibility Initiatives](#), pp 22-31

⁷ [Worldwide Brewing Alliance – Drink Drive Report 2004](#)

2. Under-age drinking

General Observations

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 support all effective measures and initiatives to tackle the problem, particularly in countries where it is gravest.

The Brewers of Europe strongly opposes the sale of beer to minors under the legal age and therefore supports the enforcement of existing national minimum purchasing age provisions.

However, we also fully concur with the view that underage drinking cannot be tackled successfully in isolation from the wider society. The scope of the problems, where these exist, requires the full commitment of all relevant stakeholders to joining forces, particularly with a view to combatting irresponsible and heavy drinking.

Effective enforcement of legislation, responsible service training, school education as well as awareness programmes aimed at parents should form the cornerstone of any sensible, targeted approach to the problem. These measures must additionally take account of the fact that, in general, younger people nowadays are more streetwise, more affluent and more independent; this may not only influence their drinking behaviour but also their ways of life. This also varies though across Europe and is not a phenomenon that can necessarily be observed so clearly in all young people in all countries.

With regard to the creation of alcohol-free settings, the brewing sector believes that there are indeed settings and circumstances that are inappropriate for the consumption of beer. When creating these settings the focus, in other words the aim to reduce misuse and underage drinking, should however not be lost.

Establishing a standardised lowest minimum purchase age of 18 years in all Member States would be misguided, in that it would not help to reduce underage drinking in countries where there is a big problem. EU Member States have legal restrictions on the age at which young people may purchase alcoholic drinks, but these age limits need to be enforced. The minimum legal purchasing age varies according to the country, to whether alcoholic beverages are fermented or distilled, and to the premises where they are available. These differences fully reflect the diversity of cultures and traditions that characterises Europe.

It is striking to note that, in countries where the minimum legal purchasing age is amongst the highest in Europe, the proportion of sixteen year-old students reporting drunkenness is clearly above the EU average. This contrasts with countries where, whilst the minimum legal purchasing age is amongst the lowest, the proportion of sixteen year-old students reporting drunkenness is substantially below the EU average.⁸

Using pricing policies will not solve the problems either. The ESPAD study clearly shows that in countries with the highest taxation the proportion of sixteen-year old students reporting drunkenness is clearly above the EU average. Conversely, in countries where taxation is low, the proportion of sixteen-year old students reporting drunkenness is substantially below the EU average. Also, any such measure is based on the assumption that the majority of minors purchase alcoholic drinks, which remains to be demonstrated: in The Netherlands for example, a recent survey carried out by IVO showed that 95 per cent of minors get alcoholic drinks from their parents' home. This all serves to highlight the importance of parents and the ineffectiveness of pricing policies.

⁸ <http://www.espad.org>

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should comply with minimum alcohol purchasing age, through, for example, strict age controls and the provision of well trained cashiers, servers and bar staff, The Brewers of Europe strongly supports enforcement of existing national laws and has a proven track record of support to partnership schemes aimed at introducing and further developing strategies.

In this important area, Members of The Brewers of Europe can claim that they have also had a pioneering role.

In Poland, the Brewers Union and the State Agency for Prevention of Alcohol Problems are in partnership since 2003 with a joint scheme targeting retailers selling alcoholic drinks and calling them to respect the law and ask for proof of age. This project has created unprecedented social awareness and the latest edition has demonstrated a substantial reduction in the number of occasions when under-age people were able to purchase alcoholic beverages.

In the Netherlands, the “Think before you serve” scheme, developed under the auspices of the Dutch Health Ministry and the hospitality sector, forms today an integral part of the country’s landscape.

In the United Kingdom, the long established Portman Group Proof of Age Card scheme became in 2003 one of the first to be accredited under the Government and Trading Standards-backed PASS Proof of Age Standards Scheme.

However, we would again like to emphasise that we represent brewers, e.g. the producers of beer, not the retailers of beer, and our influence on the hospitality and retail sector is thus very limited. But, as part of our responsibility we would like to see our products consumed in a responsible manner. We will therefore continue to encourage staff in shops and in the horeca sector to respect the national laws on serving underage.

An equally important area pertains to parental guidance.

In partnership with parents’ associations and the University of Valencia, the Brewers of Spain started in 2004 an initiative aiming to encourage open communication between parents and children and deter underage drinking.

The Brewers of Europe strongly believes that, also in this area, the brewing sector can contribute to the work.

3. Commercial Communications

General Observations

Even though there is no evidence of any causal or direct link between advertising for alcoholic beverages and individual drinking patterns, the brewing sector does acknowledge that it has a responsible role to play and certain standards to uphold. Hence the meaningfulness of codes of conduct and the need for their effective enforcement.

Across Europe the brewing sector has and follows strict code provisions to ensure that commercial communications are not targeted at minors and do not encourage excessive or irresponsible drinking.

The Brewers of Europe has recently funded a second⁹ independent report into the *Responsible Marketing of Alcoholic Beverages in Europe*¹⁰. Carried out by Canadean Limited, the report is a fact-based, European-wide review of the regulatory, co-regulatory and self-regulatory mechanisms for commercial communications for alcoholic beverages in 30 countries.

The *Canadean* Report reflects the growing consensus that legislation and self-regulation relating to commercial communications for alcoholic drinks function most effectively in combination, where self-regulation works within the broad framework of legislation. Across Europe, there is evidence of unprecedented awareness and activity. Substantial progress has been and continues to be made by drinks' associations, companies, self-regulatory organisations and social aspects organisations. Self-regulatory activity is not confined to long-established Member States: the report provides clear evidence that in more recent members too, and in accession countries, the brewing sector in particular has made great strides.

The Brewers of Europe trusts that the *Canadean* report will be considered by the European Commission and the EU Member States as an important contribution to the forthcoming Commission report on the implementation of the Council Recommendation on the Drinking of Alcohol by Young People.

Throughout Europe, the number of complaints about advertising for beer and other alcoholic beverages is remarkably low, representing less than 1.5% of the total number of complaints. This applies equally to countries where there is a high public awareness of the self-regulatory services, and to those countries where such services have less prominence.

⁹ At the request of DG SANCO, The Brewers of Europe commissioned Canadean Ltd to carry out, a first [Report on the Responsible Marketing of Alcoholic Drinks](#) in Europe - June 2002.

¹⁰ [Canadean Report 2 - Responsible Marketing of Alcoholic Beverages in Europe](#) - April 2005.

In addition, a recent monitoring exercise commissioned by The Amsterdam Group and based on 2238 advertisements (television, press and outdoor posters) which appeared in 11 countries between January and September 2003, indicated an overall compliance rate of 95%.

DG SANCO's informal draft paper reflects the increased interest in "co-regulation", a system of regulation that can be defined as involving both self-regulatory and statutory elements. In fact, the definition encompasses a wide spectrum of possible models. Indeed, varying forms of co-regulation, involving a combination of statutory (usually legislative) and self-regulatory controls, are found in the great majority of European countries. Three examples can illustrate this diversity: (1) in the United Kingdom, the Advertising Standards Association has operational responsibility for broadcast advertising regulation; (2) in Germany, unfair competition law (which embraces commercial communications) is enforced by an industry-funded body; (3) more recently, the Belgian government signed with the producers of beer and other alcoholic beverages, the hospitality sector and consumer organisations, the Arnoldus covenant whereby parties commit to strict enforcement of the original brewers' code of conduct.

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should in practice demonstrate that it is willing to act responsibly, and that all producers and retailers adhere to both the spirit and the letter of self-regulatory codes, it is a defining feature of self-regulation that its codes are applied in the spirit as well as to the letter. In this context, The Brewers of Europe has, in addition to its Guidelines for Responsible Commercial Communications¹¹, developed a Manual designed to help all relevant parties involved in the process to ensure compliance with and implementation of the letter and spirit of the provisions. The Manual includes explanatory notes aimed at providing guidance on the meaning of the provisions, test questions and actual examples of commercial communications that do not comply with the Guidelines – and why they don't.

With reference to the suggestion that the beverage alcohol industry should cease the production and marketing of products that are attractive to or target children and adolescents, The Brewers of Europe emphasises that brewers:-

- either through production or marketing, do not target minors;
- strongly oppose the sale of beer to minors.

With reference to the suggestion that the beverage alcohol industry should endorse the monitoring and enforcement of its own code of conduct through a body that is independent of the beverage alcohol and advertising industry, The Brewers of Europe observes that, although, as shown in the Canadian Report on Responsible Marketing of Alcoholic Beverages, there is no single approach, it is a fact that in a significant number of European countries:-

- stakeholders other than the producers/advertisers of alcoholic beverages are also involved in self-regulation of commercial communications;
- it is becoming an increasing feature across Europe that the creation, updating and review of self-regulatory codes and systems is held in close consultation with government and/or non-governmental parties;
- often, complaints handling is performed by adjudication panels that involve not only the usual components of a self-regulatory party (i.e. advertisers, agencies and the media), but also consumer organisations, academics and/or other civil society representatives.

¹¹ [Responsible Commercial Communications – Guidelines for the Brewing Industry](#)

4. Consumer Information

General Observations

Clear information is indeed important, to provide individuals with the guidance to make better informed decisions about their consumption. The Brewers of Europe is committed to labelling beer so that it is clear as to its nature and the consumer is aware of its strength¹² or the ingredients/substances used that may cause an allergenic reaction. However, the label of the beer container is neither the only, nor necessarily the best, way to ensure that the consumer is the best informed about the product.

Prioritisation on what information must be given on the label is necessary and any other type of information should be on a voluntary basis. In the first place, because consumers do not require the information and, in the second place, because too much information would jeopardise the legibility of the label. Specific websites, for example, may be a more effective tool to try and help reduce misuse via information given to the consumer.

Before assessing the legal and practical feasibility to have health warning labels, we would recommend that DG SANCO consider the evidence pertaining to their degree of effectiveness in reducing harm. The Brewers of Europe takes this opportunity to reiterate that health warning labels 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 (which must be the primary aim) as a result of exposure to warning labels; in particular it has not shown that warning labels are effective in preventing alcohol consumption by heavy drinkers, or irresponsible consumption by pregnant women.¹³ The Brewers of Europe would support any study monitoring the effect of health warning labels on consumers' behaviour.

We would recommend that, for the sake of clarity and consistency in relation to consumer information, DG SANCO, when describing the case for action, outlining the aim and proposing actions, expressly refers to the existing EU legislation pertaining to labelling of food and alcoholic beverages:-

- Council Directive 2000/13/EC regulates ingredient labelling
 - The Brewers of Europe believes that mandatory ingredient listing should be applied to beer broadly in accordance with the requirements of the Council Directive 2000/13/EC (the Directive already provides a current derogation for beverages above 1.2 % ABV)¹⁴;

¹² Ibidem

¹³ [The Brewers of Europe position on health warning labels on drinks' containers](#)

¹⁴ [The Brewers of Europe position on ingredient listing](#)

- Council Directive 76/766/EEC defines alcoholic strength by volume
 - Any suggestions, for instance related to alcohol content expressed in grams of alcohol should be assessed in the light of present national guidelines and/or individual company practice. However, one should bear in mind that any change would lead to confusion for the consumer, who is accustomed to the alcohol strength labelling by volume;

- Council Directive 2003/89/EC regulates allergen labelling
 - We do not see a need for additional legislation;

- Council Directive 90/496/EEC provides for the possibility to label calorific value
 - This can already be indicated on a voluntary basis on the basis of Council Directive 90/496/EEC.

Any suggestions related to dietary advice should be assessed in the light of present national guidelines and/or individual company practice. These should be voluntary, with voluntary copy advice, and we would strongly oppose any proposals that these messages be subject to compulsory pre-vetting.

The Brewers of Europe would also like to refer the Stakeholders to two studies commissioned by DG SANCO. The first report¹⁵ shows that the extra cost of labelling could have a very damaging effect on small- and medium-sized businesses, which do not have the dedicated departments to effectively deal with such issues.

In addition, a second report shows that, as far as beer is concerned, consumers are primarily interested in the gustatory quality and alcoholic strength of beer, and its origins/brand.¹⁶ Hence, any new labelling, for instance regarding calorific value, should be on a voluntary basis as it is of interest to only a limited group of consumers.

¹⁵ [The European Evaluation Consortium \(Oct 2003\) - Evaluation of the food labelling legislation](#)

¹⁶ [OPTeM \(2005\) - Les attitudes des consommateurs à l'égard de l'étiquetage. Etude qualitative dans 28 pays européens. Note de synthèse préliminaire](#)

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should label alcoholic beverages with information on alcohol concentration, alcohol content, calorific value and ingredients that might lead to allergies, The Brewers of Europe refers DG SANCO, Member States and the Stakeholders to the existing EU legislation (for further details, see General Observations above).

With reference to the suggestion that the beverage alcohol industry should submit any educational type messages placed on alcoholic beverages to review by an independent government appointed public health body before placing them on the labels, The Brewers of Europe refers DG SANCO, the Member States and Stakeholders to current individual company practices.

5. Availability and Price of Alcohol

General Observations

The Brewers of Europe reiterates its strong view that restrictive measures aiming at a general reduction of per capita consumption will not reduce alcohol misuse. Whilst many studies retrospectively demonstrate a relationship between overall level of alcohol consumption and alcohol-related harm, there is no evidence that trying to reduce everyone's drinking level would reduce the problems that exist.

In Southern Europe, the decrease in the total alcohol consumption over the last three or four decades cannot be explained by the introduction of all-population control measures.¹⁷

General restrictions on beer or other alcoholic beverages do not provide those who misuse our products with help in developing more positive behaviour patterns.

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 in countries such as Finland, Norway and Sweden since the 1950s. 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 being penalised because of irresponsible consumers, through unreasonable restrictions and unreasonable costs. The high rates as practiced in Northern European countries have failed as an instrument to improve public health and restrict immoderate consumption. Indeed the countries that have high duty rates seem to be the countries that are characterised by the biggest problems regarding underage drinking and even other illegal practices too. Sweden, a country where health objectives are predominant in determining duty levels, continues to be characterised by the presence of a large black market and high levels of unrecorded consumption. Such smuggling activities and huge cross-border shopping where duties differ hugely between countries mean that normal measures to control underage drinking and antisocial behaviour

¹⁷ Cipriani F, Prina G, Allamani A., Beccaria F, Voller F, Vidoni Guidoni O (2005). "I cambiamenti nei consumi di bevande alcoliche in Italia. Uno studio esplorativo sui motivi del decremento dei consumi negli anni 1970-2000". Osservatorio Permanente sui Giovani e l'Alcool, Rome.

will not work, thus undermining the legislation and systems that are in place in the individual countries. It is the opinion of The Brewers of Europe that this is due to the negative consequences of high taxes.

Whilst we note that excise duties on alcoholic beverages generate government revenue, the vast majority of Member States do not consider that health and social aspects should be a major determinant in setting rates.¹⁸

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should support interventions taken at Member State level by promoting educational training programmes within the industry to improve awareness and skills in beverage server training and by developing industry policy to reduce the harm done by alcohol from sales of alcohol from on-and off-premises, we would like to reiterate that the European brewing sector supports all efforts aimed at:-

- developing and improving server training schemes across Europe, taking into account local requirements;
- encouraging initiatives aimed at reducing the likelihood of our products being misused, such as responsible promotions, better designed premises and well trained staff.

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

The Brewers of Europe will further encourage the development of server training schemes to help those responsible for selling beer to address issues related to excessive beer consumption, disorderly behaviour and prevention of sales to minors. Where needed, we and our Members will promote co-operation with the retailers to encourage staff employed at point of sale to understand the principles of the codes. We must though reiterate our earlier remark that brewers have limited influence on the hospitality and retail sectors and therefore these sectors should be addressed and involved in their own capacity.

¹⁸ [Council Conclusions of 12 April 2005 on excise duties applied on alcoholic beverages](#)

6. Protection of Third Parties, especially Families and Children

General Observations

The Brewers of Europe recommends that a sense of proportion be kept when identifying the problems. It is not alcohol that may increase the risk of involvement in violence, but intoxication resulting from heavy drinking may have an effect, particularly in drinking cultures where intoxication is a more prominent characteristic. Furthermore we feel that the majority of people, even if they drink too much, are not inclined to be more aggressive; this depends primarily on the person's character per se.

Qualifying or quantifying the harm caused to third parties 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 harm neither themselves nor others. The Brewers of Europe also supports efforts to ensure that law enforcers have adequate powers to act when harm may be caused to third parties, especially families and children. Member States can base their support on best practice performed by a wide range of stakeholders, including social aspects organisations.

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should contribute to the work by implementing evidence based policies, practices and programmes in the hospitality sector, including bar design and server training, that reduce the extent of alcohol intoxication and dependence, The Brewers of Europe already drew the attention of DG SANCO, Member States and other stakeholders to the existing involvement of the European brewing sector 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.

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. Again, key is the involvement and cooperation of the hospitality sector itself, since brewers have limited direct influence over this sector.

7. Early Interventions in Problem Drinking

General Observations

The Brewers of Europe recommends that a sense of proportion be kept when identifying and measuring harmful drinking levels. The World Health Organisation itself identifies 40 g for men and 20 g for women as low risk drinking.¹⁹

We acknowledge the very high degree of efficiency of brief interventions. There is a large and robust evidence base to substantiate the claim that brief intervention in primary care is an effective and cost-effective means of reducing the health and social costs of heavy drinking.

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should provide screening and advice programmes for their employees who are at particular risk of harmful alcohol consumption and alcohol dependence, recognising that it was one of the first industries to implement successful workplace programmes, brewing companies were indeed some of the first to apprehend the potential problems associated with consumption of alcoholic beverages in the workplace and most companies have well developed policies with regard to the consumption of alcoholic beverages in the workplace.²⁰

¹⁹ [World Health Organisation \(2000\). International Guide for Monitoring Alcohol Consumption and Harm,](#)
p. 52

²⁰ [Worldwide Brewing Alliance Global Social Responsibility Initiatives,](#) pp. 44-47

8. Exchange of Information, Data and Research

General Observations

The Brewers of Europe fully appreciates the acknowledgement that all actions to reduce misuse of alcoholic beverages need a firm knowledge base.

We would like to re-emphasise the following points, which we consider essential:-

- the need for more research should be placed at the top of the list of actions because it is the most important;
- without reliable, independent, scientific, peer-reviewed evidence to justify it, no policy should be implemented;
- for every piece of evidence advocating one policy, there is still today a wealth of evidence that would seem to advocate an opposite policy, or at least that seriously puts into doubts the conclusions;
- 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. As we already emphasised, the current imbalance in the volume and scope of research that exists essentially between Northern Europe and Southern countries needs to be seriously addressed;
- there is still a need for more research into the nature of misuse and a need for a thorough and objective review of all the evidence.

The Brewers of Europe, its Members and individual companies actively support the research community's efforts to develop the evidence base, both at European and national level, particularly through the funding of the independent ERAB Foundation.²¹

This recent initiative is growing fast and gaining prestige. The European Research Advisory Board is currently funding 10 (national or cross-country) projects, some of which having already led to the publication of peer-reviewed articles in major journals despite the fact that they are not yet terminated.

²¹ www.erab.org

European Brewing Sector's Contribution to the Work

With reference to the suggestion that the beverage alcohol industry should include in its shareholder reports information on how it has aimed at preventing and decreasing the harmful use of alcohol, and any infringements of existing laws, regulations and codes of practice that have occurred, The Brewers of Europe wishes to draw the attention of DG SANCO, Member States and the Stakeholders to the fact that:-

- most brewers do not publish annual reports for shareholders, since they are small- or medium-sized companies;
- if they are published, all company shareholder reports are public and access to the reports is today greatly facilitated by generalised access to the Internet;
- the same remark applies to any infringements of existing regulations, be they statutory or self-regulatory.

However, whilst as part of our responsibility we would like to see our products consumed in a responsible manner, we would again like to emphasise that the producers of beer are generally not the retailers of the beer. We will therefore continue to encourage staff in shops and in the horeca sector to respect the national laws on serving underage.

Conclusion

The Brewers of Europe greatly appreciates the interest shown by DG SANCO in respect of our contributions to identifying and assessing strategies aimed at tackling the harmful consequences of inappropriate consumption of alcoholic beverages. It is indeed one of our main areas of concern, since our products gain in prestige and the image of our sector is improved when misuse diminishes.

We hereby wish to re-emphasise that any initiative that could be taken as a result of the present consultation process will need to:-

- be based on all the evidence;
- target the misuse of alcoholic beverages instead of compromising the pleasure enjoyed by the millions of Europeans who drink responsibly;
- take fully into account the diversity of economies, societies, cultures and traditions across the enlarged European Union;
- give much more importance to education and other training programs, by placing them at the heart of the equation;
- emphasise the importance of full impact assessments being carried out before any policies be implemented;
- be respectful of the unequivocal engagement of the European brewing sector as a fully committed partner in searching for appropriate, targeted and balanced solutions.

ANNEX TO A SECOND SUBMISSION

THE BREWERS OF EUROPE VIEWS ON EACH SUGGESTED MEASURE

1. DRINKING & DRIVING

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Giving special attention to drink-driving in the revision of the Road Safety Action programme (2005)				An initiative of DG TREN.
	Presenting and promoting a tool kit of effective evidence based measures				Accompanied by impact assessment and taking account of the local context. Particularly in the field of drinking & driving reduction strategies, measures cannot be taken in isolation from each other. Long-term awareness campaigns can be efficient as long as enforcement of national legislations is properly conducted.
	Developing a standardized Community monitoring system				The CARE database is the demonstration of these efforts.
	Examining and considering if more targeted actions are needed for young and novice drivers under the age of 26 years				National legislations are the remit for such measures. In the Netherlands, for example, such an action would contravene the law on age discrimination. In Spain and the Netherlands, such a law applies to all novice drivers irrespective of their age.
Member States	Improving official statistics to establish a more accurate base for alcohol related road fatalities and injuries in Member States.				Where needed.
	Ensuring effective and timely enforcement of existing legislation.				
	Supporting research and projects on effective measures, including a range of new techniques, such as alcohol lock devices for high risk offenders.				One of the main problems in most countries is the persistence of a contingent of drivers who repeatedly drive when intoxicated. Research has shown that the Breath Alcohol Ignition Interlock Device can be considered as an effective method for limiting driving opportunities of repeat offenders.
Beverage alcohol industry	Supporting effective drink-driving countermeasures and demonstrating responsible business activities, especially by not serving alcohol to drivers and ensuring alternative transport programmes for drivers who do consume alcohol				The European brewing sector has played a crucial part for many years in facilitating increased public awareness of the dangers inherent to drinking and driving. The opinion of the hospitality sector should be asked for since the suggested specific measures would need to be implemented by them. Brewers' influence is limited.
	Contributing to a central and independently managed fund for "Europe against Drink-driving" mobilisation				This ignores the different national approaches to combating drinking and driving, the long lasting tradition of involvement of brewers in partnerships aimed at this end, the crucial role of DG TREN and the experience so far acquired (co-funding of national designated driver campaigns, the CARE database, the European Road Safety Charter).
Non-governmental organisations	Mobilising and involving civil society to support drink-driving counter-measures and to monitor the implementation of the actions.				Monitoring implementation in such an important area should be the role of the Member States.

2. UNDER-AGE DRINKING

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Inviting in 2005 all stakeholders to a high level round table discussion on evidence based effective means to reduce under-age drinking				Whilst The Brewers of Europe welcomes this initiative, we would like to emphasise that by all stakeholders it should be meant all representative parties. This means for the drinks sectors all relevant professional organisations representing the respective sectors at EU and national levels.
Member States	If not already in place, establishing a lowest minimum purchase age of 18 years in all Member States, preserving higher minimum purchase ages, where these are in place				Establishing a lowest minimum purchase age of 18 years will not help to reduce underage drinking in countries where there is a big problem. EU Member States impose legal restrictions on the age at which young people may purchase alcoholic drinks. The minimum legal purchasing age varies according to the country, to whether alcoholic beverages are fermented or distilled, and to the premises where they are available. These differences fully reflect the diversity of cultures and traditions that characterises Europe. Effective enforcement of existing national legislations, responsible service training, school education as well as awareness programmes aimed at adolescents and their parents should form the cornerstone of any sensible, targeted approach to the problem.
	Effective and timely enforcement of existing minimum purchase age limits and alcohol licensing regulations and rules				The Brewers of Europe strongly supports enforcement of existing legislation and has a proven track record of support to partnership schemes aimed at effective enforcement.
	Introducing and ensuring the implementation of alcohol free settings such as in schools				The Brewers of Europe supports schemes aimed at ensuring that alcoholic drinks are not made available to minors. The current wording implies that places other than schools could also be made alcohol-free. Clarification is needed here.
	Establishing effective pricing policies that have an impact on young people				Such an approach would not work. The ESPAD study shows that it is in countries with the highest taxation that the proportion of sixteen years old students reporting drunkenness is above the EU average. Conversely, in countries where taxation is low, the proportion of sixteen-year old students reporting drunkenness is substantially below the EU average. Also, the proposed measure is based on the assumption that the majority of minors purchase alcoholic drinks, which remains to be demonstrated: in The Netherlands for example, a recent survey showed that 95 per cent of minors get alcoholic drinks from their parents' home. This all serves to highlight the importance of awareness programmes, the role of parents and the ineffectiveness of pricing policies.

2. UNDER-AGE DRINKING (cont'd)

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Member States	Involving and providing training and awareness programmes for parents, social workers, teachers and young people to ensure that all understand their role in young people's drinking				Awareness programmes, in particular aimed at adolescents and their parents, and educators, are indeed key.
	Making use of evidence based prevention and promotion interventions				To be clarified. Effective enforcement of legislation, responsible service training, school education as well as awareness programmes aimed at adolescents and their parents should form the cornerstone of any sensible, targeted approach to the problem.
	Mobilising public support for prevention approaches with proven effectiveness				To be clarified. Effective enforcement of legislation, responsible service training, school education as well as awareness programmes aimed at adolescents and their parents should form the cornerstone of any sensible, targeted approach to the problem.
Beverage alcohol industry	Complying with minimum alcohol purchasing age, through, for example, strict age controls and the provision of well trained cashiers, servers and bar staff				The Brewers of Europe has a proven track record of support to partnership schemes aimed at introducing and further developing environmental strategies. The leadership of the hospitality and retail sectors is of course a sine qua non, since the influence of brewers on these sectors is very limited.
Non-governmental organisations	Involving civil society, especially youth organisations, to participate in and monitor implementation of existing laws and practices				Monitoring of laws and practices is the natural remit of government. Participation of all stakeholders is of course key.

3. COMMERCIAL COMMUNICATION

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Reviewing and strengthening the implementation of Article 15 of the TV Without Frontiers Directive				Article 25 of the Directive provides for a review process. In 2003, the 4th report on the application of the Directive expressly referred to and extensively quoted an INRA study that showed that the provisions of the Directive on the application of the rules on advertising, i.e. including article 15, provided an “adequate and flexible framework for Member States rules in this area”. The study noted the extensive rule of self-regulation in this area, both in respect of the rules applied and the complaints procedures available. Finally, the study emphasised the extremely low number of complaints, showing that the Directive, as implemented in the Member States, worked effectively. The Brewers of Europe fully supports the view, expressed by the Commissioner responsible for Information Society and Media at the “TVWF” Seminar held under the Luxembourg presidency, that the “qualitative obligations in relation to alcohol (...) are adequate”, and that “the balance reached with the present TVWF seems satisfying and sufficient”.
	Closely monitoring trends in alcohol commercial communication and their effects on alcohol-related harm, especially on young people, and considering if more targeted actions are needed				Whilst a clarification is needed on the exact meaning and scope of monitoring, the proposed measure is based on the assumption that a causal relationship exists between commercial communications and (inappropriate) alcohol consumption, which remains to be demonstrated.
Member States	Better monitoring and enforcement of current national and EU statutory rules and regulations and self-regulatory mechanisms, including Article 15 of the TV Without Frontiers Directive				Whilst the proposed measure implies that the provisions of article 15 are not properly enforced, which contradicts the results of the review of the Directive (see above), it is a contradiction per se that enforcement of self-regulation is a Member State attribute.
	Taking actions to protect children and adolescents from commercial communications for alcohol				The proposed measure is based on the assumption that a causal relationship exists between drinking by young people and commercial communications for alcoholic beverages, which remains to be demonstrated. The real issue is not to protect children and adolescents from commercial communications, but rather to ensure that children and adolescents are not targeted by commercial communications for alcoholic beverages. This can be done through regulatory processes (law and/or self-regulation).
	Encouraging independent research about the effects of commercial communications in all their forms on drinking behaviour in both the short and long term				There is already a strong body of evidence showing at best an extremely tenuous correlation between commercial communications and drinking behaviour. A test case in Europe is the effect of the “Loi Evin”. In a very detailed evaluation report produced almost ten years after the French law entered into force , the National Evaluation Council acknowledged that the law had not been able to address binge drinking by young people.

3. COMMERCIAL COMMUNICATION (cont'd)

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Beverage alcohol industry	In practice demonstrating that they are willing to act responsibly, and that all producers and retailers adhere to both the spirit and the letter of self-regulatory codes				<p>The Canadean Report on Responsible Marketing of Alcoholic Beverages in Europe, published in April 2005, provides a useful overview of the regulatory environment in 30 European countries and shows that:-</p> <ul style="list-style-type: none"> – throughout the alcoholic drinks sectors, there is evidence of unprecedented awareness and activity. Internal company codes and compliance systems complement the activities of Self-Regulatory Organisations and Social Aspects Organisations at national level. At EU level, drinks sector associations like The Brewers of Europe are supporting efforts to promote best practice, to improve sub-optimal national systems and to encourage the setting up of effective self-regulatory systems in the minority of countries where one does not already exist; – substantial progress has been and continues to be made. Self-regulatory activity is not confined to long-established Member-States: the report provides clear evidence that, in more recent members too – the Czech and Slovak Republics, Poland, Estonia, Latvia, Lithuania, Malta – and in accession countries like Bulgaria, the brewing sector has made great strides. <p>It must be clarified who the group “retailers” covers, and acknowledged the important role that this party must play, as the main contact with the purchaser/consumer at point of sale.</p>
	Ceasing the production and marketing of products that are attractive to or target children and adolescents				Brewers do not target minors. Across Europe, self-regulatory codes and systems contain specific, detailed and strict provisions pertaining to minors and enforcement mechanisms are widely in place, as shown by the above mentioned report.
	Endorsing the monitoring and enforcement of its own code of conduct through a body that is independent of the alcohol and advertising industries				The proposed measure ignores the very essence of self-regulation and the existence of self-regulatory enforcement mechanisms. Across Europe, a growingly significant number of self-regulatory systems involve non-industry partners at various stages, as shown by the above mentioned report.
Non-governmental organisations	Setting targets for the regulation of commercial communications, monitoring and reporting on the marketing strategies of the alcohol industry, and on the enforcement of regulatory and self-regulatory mechanisms				<p>Setting targets:-</p> <ul style="list-style-type: none"> – falls in the natural remit of government when it comes to legislation; – is a task for those involved in the self-regulatory processes when it comes to self-regulation. <p>Monitoring of enforcement:-</p> <ul style="list-style-type: none"> – is the task of government in the case of regulatory mechanisms; – is the task of those involved in the self-regulatory processes in the case of self-regulation.

4. CONSUMER INFORMATION

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Monitoring existing codes, practices and Member State legislation, and their effects				What is meant by 'effects'? The draft strategy is about alcohol-related harm reduction, not about general consumer information. The proposed measure lacks therefore clarity.
	Monitoring the views, knowledge and interpretation of consumers to labelling, health warnings and currently used terms and descriptors				Monitoring the views of the consumers to labelling is useful in helping to understand what the consumers are looking for in relation to the products they purchase. The OPTEM study is interesting in this respect. As far as beer is concerned, it shows that consumers are primarily interested in the gustatory quality and alcoholic strength of beer. Hence, any new labelling should be on a voluntary basis as it is of interest to only a limited group of consumers. Whilst monitoring consumer views is useful, it is equally important to understand what labelling represents for the producers of alcoholic beverages, in particular in terms of costs. A recent SANCO funded report shows that the extra cost of labelling could have a very damaging effect on small and medium sized businesses. Health warning labels on beer packaging have not been shown to deter the minority who misuse the product.
Member States	Taking full use of their competences to provide better consumer information on ingredients, caloric value, alcohol content and the health and social effects of harmful alcohol use on alcoholic beverages and their marketing, and in special situations and settings to consumers				The proposed measure addresses a myriad of different situations that do not necessarily require state intervention. It is essential to prioritise on what information must be given, to properly identify the target audience, and to consider the most appropriate information vector. The proposed measure is not positive minded. It could/should for instance invite Member States to encourage exchange of best practice in consumer information/awareness initiatives.
Beverage alcohol industry	Labelling alcoholic beverages with information on alcohol concentration (% by volume), alcohol content (grams of alcohol), calorific value and ingredients that might lead to allergies				The proposed measure is very confusing. It contains a mix of EU legislative requirements, national legislative requirements, and voluntary practices. Clarification is therefore needed before the European brewing sector can deliver a complete position. Whilst consumers have the right to be provided with clear information, excessive information may be confusing. There should be a clear distinction between legal requirements and voluntary information.
	Submitting any educational type messages placed on alcoholic beverages to review by an independent government appointed public health body before placing them on the labels				Current company practice is purely voluntary and should remain so. For the record, the provisions of The Brewers of Europe Guidelines for Responsible Commercial Communications apply to all commercial communications, including labelling.
Non-governmental organisations	Monitoring existing practices and consumer views				It is difficult to understand why this should be a task only for NGOs. All stakeholders are entitled to undertake such activities.

5. AVAILABILITY AND PRICE OF ALCOHOL

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Supporting exchange of the results of research and evidence based practice on how to reduce the harmful use of alcohol				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 neither prevented strong (recorded and unrecorded) consumption growth in the Northern European countries applying these measures, nor has it modified the strongly anchored harmful drinking patterns. This view also applies to taxation. The high rates as practiced in Northern European countries have failed as an instrument to improve public health and restrict immoderate consumption.
	Assess the possibility to have a special rate of excise duty on specific alcoholic beverages that are proved to cause harmful consumption in particular among young people				The suggested measure is based on the false assumption that taxation, a typical all-population measure, can reduce alcohol-related harm. Such an approach would not work. The ESPAD study shows that it is in countries with the highest taxation that the proportion of sixteen years old students reporting drunkenness is above the EU average. Conversely, in countries where taxation is low, the proportion of sixteen-year old students reporting drunkenness is substantially below the EU average. Also, the proposed measure is based on the assumption that the majority of minors purchase alcoholic drinks, which remains to be demonstrated: in The Netherlands for example, a recent survey showed that 95 per cent of minors get alcoholic drinks from their parents' home. This all serves to highlight the importance of parents and the ineffectiveness of pricing policies.
Member States	Ensuring effective and timely enforcement of existing legislation				
	Taking action against irresponsible stakeholders				The proposed measure ignores the role of self-regulation. The Canadian report on responsible marketing of alcoholic beverages in Europe provides a detailed overview of the mechanisms, both regulatory and self-regulatory, that exist across Europe.
	Applying efficient and cost-effective measures to reduce alcohol-related harm				The efficiency of measures to reduce alcohol-related harm should be duly proven. What does cost-effectiveness mean in the light of public health purposes? Taxation for example is perhaps cost-effective in that it is economical for the resources spent to collect the taxes, but its effectiveness in reducing alcohol-related harm remains to be demonstrated. For the record, the vast majority of Member States do not have recourse to excise duties for public health reasons, but merely with a view to feeding the resources of the state.

5. AVAILABILITY AND PRICE OF ALCOHOL (cont'd)

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Beverage alcohol industry	Supporting interventions taken at Member State level by promoting educational training programmes within the industry to improve awareness and skills in beverage server training and by developing industry policy to reduce the harm done by alcohol from sales of alcohol from on- and off-premises				The European brewing sector supports all efforts aimed at developing server training schemes across Europe, and encouraging initiatives aimed at reducing the likelihood of our products being misused, such as responsible promotions, better designed premises and well trained staff. The leadership of the hospitality and retail sectors is of course a sine qua non, since the influence of brewers on these sectors is very limited.
Non-governmental organisations	Promoting and mobilising civil society to obtain broad support for interventions to reduce harmful alcohol use				Providing these interventions target harm and not the whole population, the vast majority of which consumes alcoholic beverages in a sensible manner.

6. PROTECTION OF THIRD PARTIES, ESPECIALLY FAMILIES AND CHILDREN

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Encouraging the collection and dissemination of information and examples of evidence based practice to reduce alcohol-related violence, domestic violence and child abuse				
Member States	Establishing systems of research and monitoring to obtain more complete and reliable information about the contribution of alcohol to domestic violence, family break-up, child neglect, mental disorder and other family problems.				It is not alcohol per se but alcohol <u>misuse</u> that may contribute to the problems as described.
	Ensuring that schools and other institutions and professionals having contact with children are provided with the education and training necessary to identify and support children from families with drinking problems				
	Supporting alcohol preventive activities in settings like schools, workplaces and primary care, including providing advice and support to pregnant women with hazardous and harmful alcohol consumption				Member States can base their support on best practice performed by a wide range of stakeholders, including social aspects organisations.
Beverage alcohol industry	Implementing evidence based policies, practices and programmes in the hospitality sector, including bar design and server training, that reduce the extent of alcohol intoxication and dependence				This is typically an area requiring partnerships involving primarily the hospitality sector, since the influence of brewers is limited.
Non-governmental organisations	Collecting and disseminating data to highlight the extent of alcohol related physical and psychological violence and what can be done to reduce it				
	Bringing together and disseminating evidence based examples of preventive programmes to reduce the harm done by alcohol during pregnancy and the harm done to children by families with drinking problems				

7. EARLY INTERVENTIONS IN PROBLEM DRINKING

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Identifying and disseminating examples of evidence based practice between Member States				Not only evidence based but <u>effective</u> practice.
Member States	Providing professional education and training and incentive mechanisms to ensure the widespread delivery of screening and brief intervention programmes for hazardous and harmful alcohol consumption in all health care settings, but particularly in primary health care and accident and emergency departments				
Beverage alcohol industry	Providing screening and advice programmes for their employees who are at particular risk of harmful alcohol consumption and alcohol dependence, recognizing that it was one of the first industries to implement successful workplace programmes				Brewers have indeed been pioneers in this area.
Non-governmental organisations	Developing and disseminating protocols and standards of good practice				

8. EXCHANGE OF INFORMATION, DATA AND RESEARCH

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Commission	Implementing the European Community Health Indicators (ECHI) system at national level as a public database using a public web application				The Comprehensive ECHI indicator list does not encompass the potential benefits of alcohol consumption for a number of key conditions. The First Set of ECHI indicators includes only one indicator, total alcohol consumption. A recent overview of the epidemiology related to alcohol abuse and alcohol dependence concludes that rates of alcohol use disorders do not seem to be particularly related in Europe to levels of alcohol consumption in a country's population. (Rehm et al. (2005) – European Neuro-Psychopharmacology 15:377-388. The Commission should therefore ensure that information pertaining to health indicators in relation to the consumption of alcohol beverages encompasses the whole spectrum of health and behavioural effects and conditions related to alcohol consumption.
	Providing opportunities for exchange of evidence-based practice, comparable data, promotion of research and research programmes, surveillance, and exchange of information at Community level				Research should remain a top priority. It is essential that all the evidence be reviewed. More research should be conducted in Southern Europe, to compensate the present imbalance.
	Establishing a cross-section alcohol strategy follow-up group at Community level and provide forums for dialogue with all involved partners				It is essential that organisations representing the entirety of the respective drinks' sectors concerned be involved.
	Establishing and maintaining a Europe wide system to regularly collect and disseminate information on alcohol production, manufacture, consumption, drinking patterns, social, economic and health indicators and the activities of the beverage alcohol industry which have an impact on alcohol policy activities				The suggested measure as worded gives the impression that the very fact of producing alcoholic beverages is related to harm. Why should the activities of the "beverage alcohol industry" be highlighted in such a way?
	Cooperating with other competent health bodies, such as the World Health Organization in the development of general guidelines and procedures to define the collection, analysis and dissemination of an agreed and common set of alcohol-related surveillance data				Many other organisations are as entitled as the WHO to be quoted. Cooperation with all competent bodies at national, regional and international levels should take account of the cultural diversity that characterises drinking patterns across Europe.
Member States	Initiating, promoting and encouraging transparent and independent research that addresses the determinants and consequences of alcohol consumption and the harm done by alcohol				It is essential that transparent and independent research addresses the whole spectrum of determinants and consequences of alcohol consumption. The whole spectrum includes both the positive and negative consequences of alcohol consumption on health and behaviour.

8. EXCHANGE OF INFORMATION, DATA AND RESEARCH (cont'd)

Party	Suggested measure	We support the suggested measure	We do not support the suggested measure	To be clarified and/or discussed	Comments
Member States	Collecting and disseminating information on alcohol production, manufacture and activities of the beverage alcohol industry at country level as well as epidemiological surveillance of alcohol consumption and related social, economic and health indicators and laws and regulations				The suggested measure as worded gives the impression that the very fact of producing alcoholic beverages is related to harm. Why should the activities of the "beverage alcohol industry" be highlighted in such a way?
	Promoting and strengthening training and support for all those engaged in alcohol policy activities, including research, implementation and evaluation				
	Establishing mechanisms for exchange of alcohol surveillance information between regions and countries				
Beverage alcohol industry	Including in its shareholder reports information on how it has aimed at preventing and decreasing the harmful use of alcohol, and any infringements of existing laws, regulations and codes of practice that have occurred				Not all companies produce shareholder reports. Where available, shareholder reports are public and access to these reports is today greatly facilitated by generalised access to Internet. Other communication tools may be however more appropriate in relation to the promotion of responsible consumption. Trade associations, at national, regional and international levels produce brochures, e.g. the Worldwide Brewing Alliance Global Social Responsibility initiatives .
Non-governmental organisations	Translating the evidence base into easily understood policies and practices to reduce the harm done by alcohol and acting as a 'watchdog' for the implementation of such policies and practices				Isn't this the primary role of government, rather than NGOs?
	Collecting and disseminating information and knowledge to mobilize civil society to support the implementation of evidence-based policy				This should be task for all stakeholders involved in efforts aimed at combating misuse.



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