
WHO Public Hearing on Harmful Use of Alcohol

Volume IV:

Received contributions from:

- Alcohol industry, trade and agriculture
-



**World Health
Organization**

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Department of Mental Health and Substance Abuse
World Health Organization
Geneva, 2009

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Background

On 24 May 2008, the Sixty-first World Health Assembly (WHA) adopted an important resolution on "Strategies to reduce the harmful use of alcohol" (WHA61.4). The resolution calls for the development by 2010 of a draft global strategy to reduce the harmful use of alcohol that is based on all available evidence and existing best practices and that addresses relevant policy options. The strategy will be submitted to the Sixty-third World Health Assembly in May 2010 through the 126th session of the WHO Executive Board in January 2010.

In addition to the request to develop a draft global strategy, resolution WHA61.4 also asks the WHO Secretariat to collaborate and consult with Member States, as well as to consult with intergovernmental organizations, health professionals, nongovernmental organizations and economic operators on ways they could contribute to reducing harmful use of alcohol. In response to this, the WHO Secretariat has embarked on a broad and inclusive consultation process with different stakeholders.

To follow up this latter request, a web-based public hearing was organized by the WHO Secretariat from 1 October to 15 November 2008, giving Member States and other stakeholders an opportunity to make submissions on ways to reduce harmful use of alcohol. In addition, two separate round tables, one with representatives of nongovernmental organizations and health professionals and one with economic operators, were organized in Geneva in November 2008 to collect their views on ways they could contribute to reducing harmful use of alcohol. The Secretariat is planning consultations with selected intergovernmental organizations in 2009.

Contributions to the public hearing could be submitted via a dedicated website or by fax in any of the six official UN languages (Arabic, Chinese, English, French, Russian and Spanish) from 1 October to 15 November 2008.

Contributions were sent in by individuals, civil society groups, WHO Member States and government institutions, academic and research institutions, economic operators and other interested parties. In providing their contribution, the participants were encouraged to focus on the following questions.

- What are your views on effective strategies to reduce alcohol-related harm?
- From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?
- In what ways can you or your organization contribute to reduce harmful use of alcohol?

This report contains received summaries of the submissions received in the WHO Public Hearing. All submissions are presented in their original languages. Some comments in the summary sections may have been edited before posting. This summary of the contributions together with the unedited full text submissions are available on the WHO website www.who.int/substance_abuse/activities/hearing/. In a few cases, no summaries were received, as such they are listed in the summary section with a reference to the full text. All submissions are categorized in one of the following categories: WHO Member States, government institutions, intergovernmental organizations, academia-research, nongovernmental organizations, alcohol industry, trade and agriculture, other entities and organizations or individual submission, depending on the information given by the participants.

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Anheuser-Busch Companies

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.anheuser-busch.com>

Summary:

Anheuser-Busch Companies, one of the world's largest brewers, is headquartered in St. Louis, Missouri. We are the largest brewer in the United States where we operate 12 breweries with a domestic market share of approximately 50%. Anheuser-Busch produces more than 30 different brands, including our flagship brand Budweiser, and employs more than 31,000 people worldwide. Where possible, we buy raw materials from local sources, and we use local businesses like malting companies to add value to the production chain.

Outside of the United States, we operate 17 breweries – 15 in China, one in India and one in the United Kingdom. We also have equity, licensed brewing and/or distribution agreements in Ireland, Italy and Spain as well as in Argentina, Canada, China, Japan, Mexico, Russia and South Korea. As a global company distributing our products in more than 80 countries around the world, we have learned that a single business model that does not take into account local cultures, norms and laws is doomed to fail. The same is true for promoting responsibility and reducing alcohol abuse: a single, inflexible model will not succeed. The approaches that work best respond to each market's local culture, norms and traditions.

Anheuser-Busch has earned the reputation of being the industry leader in promoting responsibility among those who choose to drink our products. Brewers do not benefit when their products are abused, and our employees – both as parents and as active members of their communities—adamantly support this belief. They have no special immunity from societal problems such as drunk driving, and they share our commitment to playing an active role in reducing alcohol abuse, drunk driving and underage drinking. As ambassadors of our company, our employees are proud of the broad range of programs we sponsor to promote responsibility.

Over the years, Anheuser-Busch has developed or supported numerous responsibility programs beginning with the Know When To Say When designated driver campaign in 1982 (all of our current designated driver efforts can be found at www.designateddriver.com). Other programs the company supports include but are not limited to server training programs, promoting designated drivers, encouraging parents to talk with their children about drinking, and retailer proof of age decals and references. More information about all of our responsibility programs is available on our web site www.beeresponsible.com.

Solving these difficult problems requires a team approach: one that involves parents, teachers, community organizations, law enforcement officials, the alcohol beverage industry, treatment and prevention authorities, and many others. Each member of the team has an important and legitimate role to play.

Our attached submission focuses on what works – and what does not work – when it comes to reducing alcohol misuse.

Full text: Nr. 262

APCV - Portuguese Brewers Association

Alcohol Industry, trade and agriculture

Country: Portugal

Web site: <http://www.apcv.pt>

Summary:

APCV represents 100% of the Portuguese beer production.

In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Understand and target the problems;
- Identify and classify the drivers of behaviour;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers choose their drink on the basis of numerous factors (including taste, occasion, culture, tradition, weather), not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches;
- The need for WHO to encourage screening and brief interventions in the health-sector.

An interesting initiative, and one which could be considered as a template for similar platforms at all levels, is the EU Alcohol and Health Forum, which aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm.

APCV, and its member associations (breweries) has delivered one commitment to the Forum on self-regulation for beer commercial communications. An important feature of our self-regulation Code is that the trade associations representing the off-trade and on-trade sectors jointly co-signed the portuguese brewers self-regulation code, extending in this way the responsible conduct to the point of sale.

APCV and its members remain committed to developing new campaigns addressing alcohol misuse-related issues as diverse as binge drinking, alcohol and pregnancy, underage drinking, and drink-driving and also to ensuring that their implementation is monitored and evaluated. In this way best practice can gain further support and be transferred and adapted to tackle similar alcohol misuse-related problems in other countries.

Concrete recent examples of the leading role played by APCV include:-

- 1 commitment under the EU Alcohol and Health Forum;
- Signing the European Road Safety Charter;
- Founding Member of the independent European Research Advisory Board for funding alcohol research.
- Contributing to the Worldwide Brewing Alliance's (WBA) Drinking and Driving Reports;
- Creating and implementing the Self-regulation Code for Commercial Communications on Beer
- Implementing several national actions on drink and driving (eg. Crash initiative; outdoors on Portuguese roads)

Full text: Nr. 186

Association des Industries des Cidres et Vins de Fruit de l'U.E.

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://aicv.org>

Summary:

Alcohol harm and misuse are a result of many complex factors which need to be effectively researched to be able to successfully change attitudes. Simplistic approaches such as increased regulation, increased taxes, prevention of promotions and advertising will not address the issue of harm. Only targeted measures will achieve this. Industry has a legitimate partner role in providing a solution to this problem

Full text: Nr. 67

Associazione degli Industriali della Birra e del Malto - Italian Brewers and Malsters Association

Alcohol Industry, trade and agriculture

Country: Italy

Web site: <http://www.assobirra.it>

Summary:

The Associazione degli Industriali della Birra e del Malto (Italian Brewers and Malsters Trade Association), from here on called AssoBirra, represents approximately 95% of the Italian beer production. In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse and abuse;
- Understand and target the problems;
- Identify and classify the drivers of behaviour;

- Consider fully the diversity of societies, cultures and traditions;
- Take account of the specificities of beer and other categories of alcoholic drinks;
- Recognise the importance of education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts, taking also into account regional diversity at national level;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches.

AssoBirra has been committed for years to being a leading and pro-active player in the dissemination of a “responsible drinking culture” in Italy through our contribution to the creation of the Osservatorio Permanente sui Giovani e l’Alcool, a well known, highly respected independent alcohol research body, established in 1991 to monitor and investigate alcohol consumption patterns.

A further interesting initiative, and one which could be considered as a template for similar platforms at all levels, is the EU Alcohol and Health Forum, which aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm.

AssoBirra, through its umbrella European Association (The Brewers of Europe), is a committer to the Forum, with a commitment addressing alcohol and pregnancy together with a prestigious scientific medical society, the Italian Society of Obstetricians and Gynecologists (SIGO).

This is part of a Global Program launched by Asobirra in 2007 and called “Guida tu la vita. Bevi responsabile” [“Drive your life. Drink responsibly”]. The Program consists of a set of initiatives to inform and sensitize on the risks connected to the abuse and/or misuse of alcohol and the intervention areas are:

- Alcohol and pregnancy
- Alcohol and driving
- Alcohol and young people

Full text: Nr. 148

Bacardi Limited

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.bacardilimited.com>

Summary:

Bacardi Limited has participated in the WHO consultation with economic operators held in Geneva on November 6, 2008 concerning the harmful use of alcohol. This contribution supplements the verbal and written contributions previously made by Bacardi Limited, the International Center for Alcohol Policies (ICAP) and the Global Alcohol Producers Group (GAPG) by providing a few examples where Bacardi Limited contributes to programs and initiatives in the areas of Responsible Marketing, Responsible Awareness and Educational Programs, and Effective Public Policies.

Full text: Nr. 314

BAVARIA S.A.

Industria del alcohol, comercio y agricultura

País: Colombia

Página web: <http://www.bavaria.com.co>

Resumen de la contribución:

Las estrategias que son eficaces para reducir los daños relacionados con el alcohol deben Incorporar a todos los grupos de interés, Las decisiones deben basarse en información transparente, científicamente comprobada, Atacar la raíz de los problemas, Impulsar leyes que muestren resultados claros y consistentes.

La mejor forma de reducir los problemas relacionados con el uso nocivo del alcohol a nivel mundial es trabajar en estrategias que busquen Educar desde edades tempranas al no consumo de alcohol, educar a los adultos en el no suministro de alcohol a menores, Reforzar las leyes que hacen referencia a la NO venta de alcohol, trabajar con todos los interesados para que sea un tema de corresponsabilidad y Dar acceso a la información sobre el consumo de alcohol y sus efectos.

En cuanto los modos en que se puede contribuir a reducir los problemas de este uso nocivo de alcohol se deben desarrollar estrategias que contribuyan a mejorar el patrón de consumo por parte de adultos y desestimular el consumo de alcohol por parte de menores de edad, así como trabajar en alianzas para implementar acciones efectivas para la prevención del consumo de alcohol por parte de menores y promover el consumo responsable.

Nuestras acciones como empresa se han centrado en desestimular el suministro de alcohol a menores de edad, basándonos en lo que se sabe a nivel científico, y apoyados por entidades expertas en el tema.

Contribución íntegra: Nr. 291

Beam Global Spirits & Wine

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: <http://beamglobal.com>

Summary:

Effective strategies should be targeted, evidence-based, multi-disciplinary and sympathetic to local cultural conditions, environment, and reflect relevant market realities. Producers can and do make a positive contribution by marketing their products responsibly within publicly stated codes of practices, responsible consumption messaging to consumers, and partnering with others on targeted interventions. Producers should be stakeholders in a strategy process.

Full text: Nr. 277

Beer Institute

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.beerinstitute.org>

Summary:

Beer Institute (BI) is the trade association for the United States brewing industry, representing large and small brewers, importers, and industry suppliers. Our members are committed to preventing and reducing alcohol abuse because responsible consumption of alcohol is a priority for us.

With a growing body of credible research suggesting that some health benefits are associated with moderate consumption of alcohol beverages, it is appropriate to focus not on overall consumption, but instead on the drinking contexts, patterns, and behaviors that may result in harm. We therefore commend this consultation's focus on the reduction of harm which results from illegal, irresponsible or excessive consumption of alcohol beverages. We support a number of harm-reduction approaches. We also sponsor and help implement various regulatory and educational approaches reinforced by industry self-regulation and voluntary compliance to minimize the risk of harm.

Alcohol licensing and regulatory regimes help to ensure that appropriate taxes are collected on alcohol beverages, reduce the risk of illegal underage sales, and maintain transparency, accountability, and quality of product. Available data, however, do not support a global control-of-consumption agenda. Broad, population-based programs aimed at discouraging all responsible drinking of alcohol beverages are not effective interventions to reduce health problems associated with alcohol abuse.

Alcohol consumption patterns and health effects differ by culture, within countries, and certainly among different countries. Differences among alcohol beverages exist as well. Because the patterns and products are not the same everywhere, neither can be the solutions to irresponsible consumption. We support culturally specific programs created in consultation with all stakeholders for targeted populations that are identified by credible research. No "one-size-fits-all" policy solution exists.

Our experience has shown that voluntary self-regulation coupled with government oversight can achieve alcohol policy goals while preserving government resources. Strong self-regulation in advertising and other business practices can also be more prompt with enforcement than government regulation can be. For example, BI and its members are committed to the voluntary self-regulation of their advertising and marketing practices. The system we currently in place has been affirmed by the U.S. Federal Trade Commission as effective in reducing the likelihood

that alcohol marketing will target underage youth and provides guidelines for content, placement, and regular audits of placement.

BI members have invested substantial resources in the U.S. and abroad to sponsor initiatives that strengthen their longstanding commitment to help ensure their products are consumed responsibly. For example, our members are leaders in providing information to encourage responsible alcohol consumption among legal drinking age adults, supporting retailer training, and creating materials to help parents talk with their children about the dangers and consequences of underage drinking. They also work with law enforcement, regulators, communities, educational institutions, and parents to enhance enforcement of existing underage-drinking and drunk-driving laws.

BI and its members strongly believe that their historic and ongoing efforts contribute to the reduction of the illegal and excessive consumption of alcohol beverages and the risks associated with that behavior.

Full text: Nr. 302

Belgian Brewers

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.beerparadise.be>

Summary:

The Federation of 'Belgian Brewers' represents approximately 99,5 % of the Belgian beer production. In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Understand and target the problems;
- Identify and classify drivers of behaviour;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers choose their drink on the basis of numerous factors, not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches;
- The need for WHO to encourage screening and brief interventions in the health-sector.

An interesting initiative, and one which could be considered as a template for similar platforms at all levels, is the EU Alcohol and Health Forum, which aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm.

The Brewers of Europe and ourself, we are by far the number one committers to the Forum, with over a third coming from the brewing sector - 36 in total. These commitments are aimed at addressing alcohol misuse-related issues as diverse as binge drinking, alcohol and pregnancy, underage drinking, and drink-driving. An important feature is also the number and diversity of partnerships with those who wish to support, finance and associate themselves with these commitments. For example:

- National, regional and local governments;
- Road safety and police authorities;
- Civil society;
- Young people's groups (18-30);
- Health and medical associations;
- Consumer Groups;
- Self-regulatory organisations;
- Media.

The 'Belgian Brewers' and its members remain committed to developing and further improving these campaigns, and also to seeing to it that their implementation is monitored and evaluated. In this way best practice can gain further support and be transferred and adapted to tackle similar alcohol misuse-related problems in other countries.

Concrete recent examples of the leading role played by our European Association 'The Brewers of Europe' include:

- 25 commitments under the EU Alcohol and Health Forum;
- Signing the Alcohol and Health Forum's Charter;
- Contributing to the Worldwide Brewing Alliance's (WBA) Drinking and Driving Reports;
- Contributing 300 of the initiatives identified in the WBA's "Global social responsibility initiatives" publication.

Full text: Nr. 166

Bodegas de Argentina, A.C.

Alcohol Industry, trade and agriculture

Country: Argentina

Web site: <http://www.bodegasdeargentina.org>

Résumé de la contribution no disponible.

Contribución íntegra: Nr. 182

Brasseurs de France

Industrie, commerce et agriculture en rapport avec l'alcool

Pays: France

Adresse du site Web: <http://brasseurs-de-france.com>

L'Association des Brasseurs de France représente environ 98% des producteurs de bières en France, tant les grands groupes internationaux que les entreprises artisanales.

Les Brasseurs de France avec leurs membres sont engagés depuis plusieurs années dans la promotion d'une consommation responsable de la bière, dans un contexte légal de vente des boissons alcoolisées déjà très encadré (Loi Evin) et en voie de possibles nouvelles évolutions restrictives (Loi Patients, Santé, Territoires).

Depuis une dizaine d'années, les brasseurs

- ont diminué le degré moyen de leurs principales références (entre -0,5 et -0,7%alc),
- développé des marques à faible degré alcoolique (entre 2 et 4,5°)
- amélioré la qualité et la disponibilité des bières sans alcool.

A partir de 2006, l'association des Brasseurs de France a mené plusieurs actions:

- Création d'un site reperes-alcool.com en 2006, pour informer sur les seuils d'une consommation modérée en unités d'alcool, telle que recommandée par l'OMS;
- Lancement d'une campagne en presse quotidienne nationale "La bière s'apprécie avec responsabilité" en 2006, reprise en 2007 et 2008;
- Mention du nombre d'unités d'alcool par contenant et du nom du site sur les conditionnements des principales marques du marché dès 2007.

L'ensemble de ces actions a été accompagné d'un dispositif de relations presse qui ont généré de nombreux articles sur cette démarche de consommation responsable.

Parallèlement à ces actions, Brasseurs de France participe aux ateliers de réflexion et d'échanges organisés par Alcool Assistance, principale association de soutien et d'écoute à l'attention des consommateurs excessifs.

Les principaux brasseurs, membres d'Entreprise et Prévention, association qui réunit les différents producteurs de boissons alcoolisées dans le but de promouvoir des actions de prévention notamment auprès des jeunes, ont soutenu et utilisé les outils d'information sur la mise en place du "conducteur désigné" dans les établissements de nuit et discothèques (Celui qui conduit, c'est celui qui ne boit pas).

Face à l'émergence de nouveaux modes de consommation excessive (binge drinking), les brasseurs sont favorables à une meilleure éducation et information auprès des jeunes.

Limiter l'offre en magasin ou reculer l'âge d'accès à certaines boissons ne saurait résoudre ces phénomènes de consommation excessive des jeunes et risque au contraire de radicaliser leur comportement. Les brasseurs sont favorables à une meilleure information de tous les publics et des jeunes en particulier, sur les risques associés à l'excès et sur les repères d'une consommation responsable.

Au sein du Conseil de Modération et de Prévention, mis en place par le gouvernement, les Brasseurs de France dispose d'un siège et sont en charge plus particulièrement des actions d'éducation et de prévention.

Brewers Association of Australia and New Zealand Inc,

Alcohol Industry, trade and agriculture

Country: Australia

Web site: <http://www.brewers-association.net>

Summary:

The Brewers Association of Australia and New Zealand Inc represents Australia and New Zealand's major manufacturing breweries on regulatory and broader public policy issues. The Brewers Association has a proud history of contributing to public debate across a variety of areas including taxation, advertising, and alcohol education.

The Brewers Association believes that any strategy to reduce alcohol-related harm must necessarily be founded on a strong evidence base. Consequently, a robust alcohol strategy will seek to both maximise the benefits and minimise the harms, and have as its starting point that most consumers drink moderately, enjoy it and benefit from it, thus recognising the strong distinction between alcohol consumption and alcohol misuse.

Alcohol misuse is not a problem of simple, linear cause and effect relationships. Instead, a raft of complex and interacting factors underlie a society's attitudes and actions towards alcohol use, dramatically reducing the likely effectiveness of any intervention taken in isolation. Therefore, it is essential that the background and diversity of societal and cultural settings be fully considered in any strategy.

The Brewers Association strongly believes that a partnership approach must be taken in formulating any strategy to reduce alcohol-related harm. This approach considers all stakeholders on an equal footing and recognises and actively seeks the input of all stakeholders in a debate.

The Brewers Association is a strong supporter of targeted education and social responsibility initiatives and continues to support responsible drinking initiatives in Australia and New Zealand.

Full text: Nr. 96

Brewers Association of Canada

Alcohol Industry, trade and agriculture

Country: Canada

Web site: <http://www.brewers.ca>

Summary:

The Brewers Association of Canada (BAC) is the national association representing brewers licensed to operate from coast to coast in Canada. Brewers have been operating businesses in Canada for over 350 years. Each year the brewing industry generates more than 1.2% of the GDP (over \$12 billion) and direct full-time employment for more than 13,000 Canadians with another 153,000 jobs generated indirectly.

The Canadian brewing industry has long promoted the responsible consumption of its products, and most Canadians consume and enjoy alcohol beverages in a responsible manner. More than three decades of medical and scientific research shows that the moderate consumption of alcohol is associated with a wide range of health benefits.

Over the years, the Canadian brewing industry has worked closely with partners and stakeholders in seeking to reduce alcohol misuse in its various forms, including addressing issues of alcohol and general health, fetal alcohol spectrum disorder (FASD), impaired driving, binge drinking, and misuse among specific populations including young adults. These cooperative initiatives have involved a wide variety of programs and partnerships involving: the National Alcohol Strategy, the Screening, Brief Intervention and Referral (SBIR) program, the Canadian Foundation on Fetal Alcohol Research (CFFAR), the Fetal Alcohol Canadian Expertise (FACE) Conference, the Motherisk Program of the Toronto Hospital for Sick Children (toll-free helpline), the Student Life Education Company, the Traffic Injury Research Foundation (TIRF) and the ABMRF/The Foundation for Alcohol Research, among others. In addition to these efforts, since 1981, the Canadian brewing industry has strived to effect changes in the social conscience of Canadians when it comes to alcohol consumption and misuse, utilizing all available media and collateral materials, including public service advertisements.

On an international level, through the Worldwide Brewing Alliance (WBA) the BAC contributes to the publication of the "Global Social Responsibility Initiatives" report which details activities by brewing companies and their Associations at the global level in addressing alcohol misuse. The WBA also produces a global report on impaired driving, which on a country by country basis, describes the legislation governing impaired driving, legislative changes, statistical trends and industry programs.

Within Canada, the National Alcohol Strategy (NAS) recognizes the health benefits of moderate consumption, differentiates between responsible consumption and misuse, emphasizes the importance cooperative efforts involving industry and other stakeholders, and stresses importance of research.

Similarly, an effective framework for a global alcohol strategy should include long-term cooperation between industry, medical and addiction experts, NGOs and governments in order to develop and deliver programs and educational initiatives which engage those directly at risk. At the same time, these efforts must be balanced with the recognition that moderate alcohol consumption can be part of a healthy lifestyle and that a culture of moderation, if encouraged and sustained, will lead to the reduction in alcohol misuse and harm.

Full text: Nr. 305

Brewers Association of Japan

Alcohol Industry, trade and agriculture

Country: Japan

Web site: <http://www.brewers.or.jp>

Summary:

The Brewers Association of Japan (BAJ) was founded in 1953 and has been granted the state of a specially approved Non-Profit Organization in accordance with, and under the terms of Liquor Industry Association Act.

Members of BAJ are Asahi, Kirin, Sapporo, Suntory and Orion.

One of the main objectives of the Association is to carry out promotion activities of preventing underage drinking, moderate consumption of alcohol. BAJ believes the effective measures to reduce the risk of harmful use of alcohol require following key initiatives;

- Full understanding of the diversity of societies, cultures and tradition surrounding drinking environment
- Pragmatic and cost effective measures based on evidence , taking consideration of a given specific social infra-structure of the market
- Engagement of all stakeholders and close partnership among them.

In our submission, we would like to stress particularly the importance and the value of the involvement of economic operators. We will demonstrate this by introducing the integrated activity to combat underage drinking problems organized in Japan for the past several years.

The nature of alcohol related problems is different from country to country due to the vast diversity of national culture and drinking pattern under the different social and economic domain. Therefore in order to ensure the most effective and pragmatic solutions for the reduction of risks caused by the harmful use of alcohol, it is critical to have an accurate understanding of the drinking pattern in each country.

Participation of the economic operators is therefore essential in formulating national strategy and actual implementation of the plans since they have vast and profound knowledge and experience of the issues. They can take proactive and major role in implementing most effective programs.

The characteristics and the biggest contributing factors of the success of the campaign we have conducted can be described as the collaboration of key stakeholders. While economic operators have been central force to make the project forward, the plan has been strongly supported and endorsed by Ministry of Health, Labor and Welfare , National Tax Agency, Ministry of Education and Culture, schools, trade associations and public health sectors.

In order to ensure the effectiveness and impact of the project, this exercise has been carefully synchronized with supporting advertising programs. Direct educational activities voluntarily organized by economic operators has also supported the success of this project

The program has been conducted since 2005 and the performance of the campaign has been regularly evaluated. Government statistics clearly shows the favorable outcome. We are pleased to note the drastic decline of the underage drinking experience among Japanese student It is worth emphasizing following elements as the key success factors:

- Integrated communication program and in-store activity
- Involvement of target population
- Support of all stakeholders
- Utilization of eye-catching symbol and POS materials
- Continuous educational and awareness program

We hope this will make a useful model case for other countries to refer in planning their own strategies.

Full text: Nr. 139

Brewers of Romania Association

Alcohol Industry, trade and agriculture

Country: Romania

Web site: <http://www.berariiromaniei.ro>

Summary:

The Brewers of Romania Association represents over 80% of the Romanian beer industry. In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between moderate alcohol consumption, which has a number of benefits, and alcohol misuse;
- Understand and target the problems;
- Take account of the specificities of beer and the reasons why consumers choose to consume the different drinks;
- Recognize the importance of education and training;
- Encourage responsible behavior;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:

- Interventions that educate the consumers, showing them the benefits of a moderate and responsible consumption on the one hand, and the harmful consequences of alcohol misuse (when: drink-driving, heavy drinking, underage drinking) on the other hand
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches.

Concrete recent examples of the role played by The “Brewers of Romania” Association in the EU include:-

- 2 commitments under the EU Alcohol and Health Forum;
- Signing the European Road Safety Charter.

The “Brewers of Romania” Association’s commitments, until now, address three main issues in Romania: underage drinking, drink-driving and self-regulation of commercial communications. An important feature is also the number and diversity of partnerships with those who wish to support and associate themselves with these commitments. For example:

- The Romanian Ministry of Education, Research and Youth;
- Road safety and crime-prevention police authorities;
- Teachers and high school students;
- The Human Relations Institute;
- Self-regulatory organizations;
- Media.

The “Brewers of Romania” Association and its members remain committed to developing and further improving the two social campaigns and the self regulation commitment, and also to ensuring that their implementation is monitored and evaluated.

Full text: Nr. 75

Cámara Nacional de la Industria de la Cerveza y de la Malta (México)

Industria del alcohol, comercio y agricultura

País: Mexico

Página web: <http://www.canicerm.org.mx>

Resumen de la contribución:

Los Cerveceros Mexicanos hemos manifestado el compromiso con la prevención y combate de las pautas de consumo nocivo, junto con las autoridades de Salud y Educación.

Estas acciones han sido llevadas a cabo por medio de educación, capacitación y orientación a la población para alentar la cultura de la responsabilidad frente al alcohol y fortalecer la observancia de la ley.

Para las políticas publicas en torno al tema del alcohol deberían de tomar en cuenta aspectos, regionales, sociales y culturales de cada región o país.

La OMS debe poder ser un facilitador de este proceso de colaboración. Para ello, necesita proporcionar herramientas para el diseño de investigaciones así como difundir métodos para la adecuada evaluación de las intervenciones públicas, generando elementos objetivos de comparación y aprendizaje entre regiones y países.

Hay muchas acciones que coordinadas con la industria, el comercio y la autoridad se pueden adecuar y reforzar con lineamientos modernos que ayuden a evitar las consecuencias de los daños relacionados con un consumo abusivo de alcohol.

Una estrategia que parte con bases sólidas y reales, debe de considerar una base de datos con estadísticas confiables para poder contemplar acciones puntuales en lugares, momentos y segmentos en que la incidencia de daños sea más frecuente, así como cambiar los patrones de consumo para una conducta responsable en torno al alcohol.

Tomar acciones contundentes para frenar y disminuir el consumo y oferta de bebidas alcohólicas sin controles sanitarios y/o adulteradas, para evitar la oferta de estas bebidas y evitar que se consuman y dañen a la población.

Contribución íntegra: Nr. 295

Cervecería Nacional S.A.

Industria del alcohol, comercio y agricultura

País: Ecuador

Resumen de la contribución:

Cervecería Nacional S.A., es la más grande empresa de la industria Cervecera en el Ecuador, con más de 120 años de trabajo haciendo historia y apoyando al desarrollo del país, directamente a través de la generación de empleo y fuentes de riqueza a miles de ecuatorianos, así como por sus planes de desarrollo sostenible e inversión social, apoyo a la educación, cultura y deporte.

Cervecería Nacional actúa responsablemente con la comunidad en la que opera y con sus consumidores, llevando a cabo campañas permanentes para disminuir los efectos nocivos del abuso del alcohol, así como erradicar el consumo de cerveza en los menores. Para lo cual cuenta con políticas de alcohol claramente definidas para sus empleados y códigos de autorregulación comercial para evitar la exposición a menores de publicidad que pueda incentivar o promover el consumo, liderando campañas de prevención y concientización

En ese sentido, y en relación con los daños producidos por el alcohol, debemos dejar sentado que dichos efectos surgen como consecuencia del abuso y del consumo irresponsable de bebidas alcohólicas, ya que un consumo moderado está perfectamente en armonía con un estilo de vida saludable.

Aceptando esta realidad, en el diseño de una adecuada estrategia para reducir el impacto de los efectos nocivos, provocados por el abuso y/o consumo irresponsable del alcohol, se debe de tener en cuenta lo siguiente:

- a) La corresponsabilidad de todos los actores de la sociedad en el combate del abuso del alcohol y sus efectos.
- b) La importancia de contar con información cierta y objetiva sobre los verdaderos efectos del consumo irresponsable, así como de las distintas realidades locales que deben de tenerse en cuenta el momento de establecer políticas en este sentido.
- c) Combatir el mercado ilegal de alcoholes, cuya actividad es de alta peligrosidad por la falta de control sobre la inocuidad de sus productos. Las políticas restrictivas al comercio legal, constituyen un estimulante para el desarrollo de estas actividades ilícitas afectando gravemente la salud de la población, evadiendo sus responsabilidades sociales y fiscales.

Tal como hemos dicho anteriormente, este es un problema en cuya solución debemos aportar todos. En tal sentido consideramos que a nivel global la actuación de la Organización Mundial de la Salud es de relevante importancia para promover la adecuada investigación y proveer a los profesionales de la salud de la información necesaria para los distintos programas de prevención a nivel local, así como articulando espacios de discusión como el actual.

Cervecería Nacional S.A. de manera permanente, siguiendo su compromiso con la comunidad, con los consumidores, con el desarrollo sostenible, con el medio ambiente, con nuestros colaboradores, con la autorregulación, respetando las obligaciones del estado, lleva a cabo programas específicos tendientes a concientizar e intervenir en la población desalentando el consumo irresponsable y erradicando el consumo de menores.

Guayaquil, 14 de noviembre de 2008.

Contribución íntegra: Nr. 285

Cerveceros Latinoamericanos

Industria del alcohol, comercio y agricultura

País: United States of America

Página web: <http://www.cerveceroslatinoamericanos.com>

Resumen de la contribución:

1. Estrategias eficaces.

1.1 Las estrategias costo-eficientes deben tratar de reducir patrones de consumo perjudiciales y considerar las importantes diferencias de contexto señaladas por la OMS.

1.2 Nuestra posición descansa tanto en nuestro propio conocimiento de la región como en recomendaciones formuladas por la misma OMS.

1.3 Las estrategias eficaces requieren que:

- Estén dirigidas al consumo nocivo y no al consumo en general.
- Estén enfocadas al cambio de patrones de consumo nocivo.
- Promuevan el cambio con una sociedad bien informada sobre las consecuencias de ese tipo de consumo y esté motivada adecuadamente
- Estén basadas en conocimiento científico provenientes de los países y regiones.
- Sean evaluables.
- Promuevan la cooperación entre todos los sectores.

1.4 Las estrategias dirigidas a una regulación para controlar la oferta legal conducen al alcohol ilícito, se afecta gravemente la salud pública y resultan más costosas para el Estado.

1.5 La cerveza tiene la posibilidad de ofrecer una amplia gama de opciones con gradación alcohólica a partir de cero alcohol.

1.6 Problemas que pueden y deben ser atendidos con acciones por el sector gubernamental, con la participación de otros sectores de la sociedad:

- Consumo por menores;
- Consumo por embarazadas;
- Conducir vehículos habiendo consumido;
- Consumo concurrente con algunas enfermedades.

1.7 Intervenciones dirigidas a prevenir el consumo en estas situaciones:

- Establecimiento y aplicación de límites de alcohol en la sangre.
- Programas dirigidos a jóvenes y embarazadas.
- Programas dirigidos a pediatras y obstetras.
- Códigos de autorregulación.
- Programas educativos dirigidos a padres, maestros y comunidades.
- Programas de comunicación para la población en general que contribuyan a modificar los patrones de consumo nocivo.

2. Perspectiva global.

2.1 Una perspectiva “global” debe ver el problema del uso nocivo del alcohol dentro del contexto de las diferentes realidades culturales, sociales y económicas de los diferentes países y regiones.

2.2 Una estrategia global única puede incrementar los costos gubernamentales en su aplicación y no alcanzar su objetivo en algunos países, aún siendo costo-eficientes en otros.

3. Modos en que Cerveceros Latinoamericanos contribuye a reducir el uso nocivo del alcohol.

3.1 Estamos comprometidos a asignar recursos y a participar activamente con otros sectores involucrados en la reducción del consumo nocivo de alcohol.

3.2 Investigación sobre patrones de consumo.

3.3 Código de autorregulación. La mayoría de las empresas cerveceras latinoamericanas han establecido códigos y los aplican conjuntamente con estrategias para contribuir a evitar la venta de sus productos a menores.

3.4 Programas dirigidos a la prevención del consumo de alcohol por menores.

3.5 Programas dirigidos a padres de familia y educadores con el objetivo de facilitar la comunicación con los menores sobre los efectos del alcohol y contribuir a prevenir su uso.

3.6 Alianzas con ONGs en la realización de estudios para conocer mejor la realidad del consumo de alcohol en varios países o para desarrollar programas preventivos.

3.7 Centro de Información sobre Salud y Alcohol, ente independiente que contribuye a la difusión del conocimiento científico sobre este tema (Brasil).

Contribución íntegra: Nr. 256

Cerveceros Latinoamericanos (English version)

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.cerveceroslatinoamericanos.com>

Summary

1. Efficient strategies.

1.1 Cost-efficient strategies should aim at changing harmful alcohol consumption patterns and consider the differences of context stated by WHO.

1.2 Our position relies on our own knowledge of the region, as well as on recommendations by WHO.

1.3 Efficient strategies must:

- Be aimed at harmful use and not at general use of alcohol.
- Be directed to changing harmful consumption patterns.
- Promote change within a society that is well informed about the consequences of that type of consumption and that is also motivated to change.
- Be based on scientific knowledge that comes from the countries and regions.
- Be subject to evaluation.
- Promote cooperation among all stakeholders.
- Allows local adjustments based on evaluation and experience.

1.4 The strategies aimed at controlling the legal offer lead to illegal alcohol, public health is severely affected and results in a higher expense to the nation.

1.5 Beer offers the possibility of a wide range of options in alcohol strength from zero alcohol on.

1.6 Problems that can and must be solved by the governmental sector, along with the participation of other sectors of society, including the alcohol industry:

- Consumption by minors;
- Consumption during pregnancy;
- Consumption before or while driving;
- Consumption while having some diseases or being ill.

1.7 Possible ways of preventing alcohol consumption in these situations:

- Establishing and enforcing blood alcohol limits.
- Programs aimed at under age people and pregnant women.
- Programs aimed at pediatricians and obstetricians.
- Self regulation codes.
- Educational programs aimed at parents, teachers and communities.
- Communication programs, aimed at the population as a whole, to contribute to change harmful consumption patterns.

2. Global perspective.

2.1 A “global” perspective should perceive the problem of harmful use of alcohol within the context of the different cultural, social and economic realities of all the different countries and regions.

2.2 A single strategy could increase governmental expenses and, even though it could be cost-efficient in some countries, it might not achieve its purpose in some others.

3. Ways in which Cerveceros Latinoamericanos contributes to reducing harmful alcohol use.

3.1 We are committed to assign resources and to participate actively along with other stakeholders in the reduction of harmful alcohol use.

3.2 Research about alcohol consumption patterns in the Latin-American Region.

3.3 Region-wide self-regulation code; most Latin-American brewing companies have established and apply their own codes.

3.4 Strategies to stop selling alcohol to under age people.

3.5 Programs aimed at the prevention of alcohol consumption by minors.

3.6 Programs aimed at parents and teachers to facilitate communication with minors about the effects of alcohol; contributing to the prevention of its consumption.

3.7 Alliances with NGOs with the purpose of researching and studying the reality of alcohol consumption in several countries and/or to develop prevention programs.

3.8 Information Center on Health and Alcohol (Centro de Informação sobre Saúde e Álcool), independent organization that contributes to spreading scientific knowledge about this issue (Brazil).

Full text: Nr. 257

Comision para la Industria de Vinos y Licores (CIVyL) de Mexico

Industria del alcohol, comercio y agricultura

País: Mexico

Resumen de la contribución:

La existencia del mercado informal de bebidas con contenido de alcohol es, en algunos países, uno de los principales problemas para reducir el uso nocivo del alcohol. El mercado informal, por definición, está fuera de cualquier control y, en muchas ocasiones, se alimenta precisamente de la ventaja desleal que implica el no cumplimiento de la ley y los estándares sanitarios.

Los operativos contra la producción y venta de bebidas informales son necesarios pero no suficientes para atacar la principal causa del mercado informal; es decir el incentivo que genera el diferencial de precios entre el mercado formal que paga impuestos y cumple con las disposiciones legales aplicables, por una parte, y el mercado informal que no paga impuestos y se encuentra fuera del control de las autoridades sanitarias o de otra índole, por otra parte.

La aplicación de altas tasas impositivas puede resultar contraproducente. Si bien es cierto que según la teoría económica, a un mayor precio corresponde un menor consumo, en el caso de las bebidas con contenido de alcohol se puede dar, y de hecho se da en algunos países como México, una sustitución de bebidas formales por informales que mantiene o incluso aumenta el consumo.

El nivel de impuestos a las bebidas con contenido de alcohol debe tomar debidamente en cuenta el contexto nacional y las diferencias de recursos, capacidades y medios de cada país para evitar que dichos impuestos se vuelvan un incentivo para el desarrollo del mercado informal.

El supuesto según el cual entre mas alto sea el impuesto habrá un menor consumo, no es universalmente correcto. La realidad muestra que a partir de un determinado nivel, en algunos países, en vez de reducir el consumo se incrementa el mercado informal y por ende el uso nocivo del alcohol.

Finalmente, CIVyL considera que la industria de vinos y licores puede apoyar el combate al mercado informal:

- Realizando campañas en los medios de comunicación exhortando a los consumidores a no comprar bebidas con contenido de alcohol de dudoso origen;
- Informando a la población sobre los riesgos que conlleva el consumo de bebidas con contenido de alcohol de dudoso origen;
- Proporcionando a los consumidores información sobre las características de las bebidas con contenido de alcohol en las que hay que fijarse para no caer en engaños
- Colaborando con las autoridades competentes para localizar los centros de producción y venta de bebidas con contenido de alcohol informales.
- Facilitando a las autoridades competentes el apoyo técnico o el equipo necesario para identificar si un producto dado corresponde a la marca que ostenta o se trata de una bebida falsificada.

Contribución íntegra: Nr. 259

Confédération Européenne des Vignerons Indépendants

Industrie, commerce et agriculture en rapport avec l'alcool

Pays: France

Adresse du site Web: <http://www.cevi-eciw.eu>

Résumé de la contribution:

Pour la Confédération Européenne des Vignerons Indépendants, une stratégie mondiale de réduction de l'usage nocif de l'alcool doit avant tout être une stratégie en mesure d'intégrer les initiatives et stratégies existantes, dans le respect de la culture de chacune d'elle et des intervenants qui la portent.

Par ailleurs, concernant les moyens pour mettre en œuvre cette stratégie, la CEVI est convaincue (de part les expériences et modèles de plusieurs pays) que la stratégie la plus efficace est celle de l'éducation, basée sur la prise en compte des schémas de consommation. A ce titre, il nous semble aussi important de souligner que la consommation modérée de vin est tout à fait compatible avec un mode de vie sain.

Les vignerons indépendants sont déjà engagés, concrètement, dans la lutte contre la consommation abusive d'alcool. Au niveau individuel, chaque vigneron est en lien direct avec le consommateur. Les vignerons indépendants respectent les vins qu'ils élaborent eux-mêmes. Ils sont naturellement des ambassadeurs d'une consommation respectueuse de leur produit, donc responsable.

Au niveau de nos associations, nous sommes engagés dans le programme Wine in Moderation (www.wineinmoderation.eu) dont l'objectif est la promotion de la consommation modérée de vin et la lutte contre la consommation abusive d'alcool en Europe.

Contribution intégral: Nr. 86

Copa-Cogeca

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.copa-cogeca.eu>

Summary:

Copa-Cogeca represents European farmers and their cooperatives. Therefore they represent wine producers.

Most of the population that consumes alcohol does so in a way which is not harmful. However part of the population misuses alcohol and put themselves and their families in danger. For Copa-Cogeca it is therefore necessary to differentiate between measures aimed at tackling harmful alcohol consumption and measures aimed at preventing alcohol misuse.

Since this is a complex problem, both types of measures need to be based on sound and extensive scientific evidence.

Furthermore, in order to be effective, measures have to be tailored to the target population and to the result to be achieved. These measures should be targeted at risk groups such as pregnant women and children to prevent them from consuming alcohol, at consumers to prevent them from misusing alcohol or to people with alcohol consumption problems to help them solve them.

Restrictive measures are not necessarily the solution to the problem of harmful alcohol consumption. However, Copa-Cogeca strongly believes in the role of education to prevent harmful alcohol consumption.

Copa-Cogeca is very much concerned about harmful alcohol consumption. This is why it has created, together with CEEV (wine industry and trade) and CEVI (independent vineyards), a programme named Wine in Moderation (WIM) which aims at promoting moderation and responsibility in wine consumption.

Full text: Nr. 110

Danish Brewers' Association

Alcohol Industry, trade and agriculture

Country: Denmark

Web site: <http://www.bryggeriforeningen.dk>

No summary available.

Full text: 240, 241 and 242

Deutscher Brauer-Bund e.V. (German Brewers Association)

Alcohol Industry, trade and agriculture

Country: Germany

Web site: <http://www.brauer-bund.de>

Summary:

The German Brewers' Association represents approximately 75% of the German beer production. In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Understand and target the problems;
- Identify and classify the drivers of behaviour;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the specificities of beer and other categories of alcoholic drinks;
- Recognise the importance of education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches.

An interesting initiative, and one which could be considered as a template for similar platforms at all levels, is the EU Alcohol and Health Forum, which aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm.

Under The Brewers of Europe's umbrella, the German Brewers have submitted a commitment to the Forum. The German Brewers felt that, although the law providing that beer should not be sold or served to individuals under 16 was largely known by retailers and sellers, there was room for improvement, particularly where adults were the ones buying the drinks for the minors. We therefore committed to provide tools (logos, posters, leaflets, guidance documents, a website etc.) that recall the law

An important feature of the 36 commitments so far coming from the brewing sector is also the number and diversity of partnerships with those who wish to support, finance and associate themselves with these commitments. For example:

- National, regional and local governments;
- Road safety and police authorities;
- Civil society;
- Young adults;
- Health and medical associations;
- Consumer Groups;
- Self-regulatory organisations;
- Media.

Further concrete examples of the German Brewers' engagement, in addition to our commitment under the EU Alcohol and Health Forum include:

- Signing and committing, through our activities against drinking and driving, to the European Road Safety Charter Alcohol (2008);
- Developing and adopting a Code of Behaviour (Brewers' Code 2007) as well as guidelines for responsible commercial communication (2003 and ongoing);
- Contributing to the Worldwide Brewing Alliance's (WBA) Global Social responsibility initiatives and Drinking and Driving Reports;
- Support of our members fight against alcohol abuse, providing material, expertise and personnel.

Full text: Nr. 157

Diageo

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: www.drinkiq.com

Summary:

Alcohol is a special product - enjoyed responsibly by most, misused by a minority. Diageo is aware of the positive, and sometimes negative role alcohol can play in the lives of individuals and in society. In aspiring to change consumer attitudes and behaviour, we recognize that we cannot achieve behavioural or cultural change by ourselves, and we will continue to find opportunities to work in partnership with others to bring about change.

We understand our responsibility to produce, market and sell our brands responsibly. We also believe that there is a shared responsibility with individuals, families, governments, law enforcers and educators to address alcohol misuse with respect to diverse cultures around the world.

Diageo has experience of understanding and communicating with consumers which we use to make our Responsible Drinking campaigns relevant to at-risk groups. We work in a range of ways with many different stakeholders running over 110 programmes in over 45 markets to raise awareness, promote responsible drinking and combat misuse such as drink driving, excessive drinking, underage drinking and irresponsible serving of alcohol.

We believe we have particular experience and expertise to share in the following three areas, above and beyond the significant level of activity industry is already involved with, to contribute to reducing the harmful use of alcohol.

- Marketing responsibly, and particularly our focus on compliance and controls;
- Marketing responsibility, and using our marketing tools and consumer insights to craft relevant responsible drinking messages; and
- Equipping all our stakeholders, including our employees and partners, to promote and be ambassadors for responsible drinking via DRINKiQ and DRINKiQ.com

Full text: Nr. 64

Distilled Spirits Council of the United States

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://discus.org>

No summary available.

Full text: Nr. 319

Dreher Breweries

Alcohol Industry, trade and agriculture

Country: Hungary

Web site: <http://dreher.hu>

No summary available.

Full text: Nr. 78

European Forum for Responsible Drinking (EFRD)

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.eprd.org>

Summary:

It is well-established that most people who consume alcohol do so in moderation. Alcohol-related harm is largely related to high risk drinking behaviour among a minority of people and therefore it is patterns of alcohol consumption, rather than overall consumption that provide the best predictor of harm. Therefore, if strategies for minimising harm are to be effective they need to be targeted to address risky drinking patterns rather than average per capita consumption of the population.

Effective interventions to reduce health-related problems associated with alcohol consumption:

1) Drinking patterns vary across Europe, gender and age groups. These patterns, rather than over-all consumption of alcohol, are the best predictors of harm. Therefore, to achieve long-term sustainable results, only interventions which have proven to effectively address harmful drinking patterns should be eligible.

2) The evidence does not support any one single approach to harm-minimisation, but instead flexible approaches are needed that can be adapted to address specific needs of target populations. National strategies are likely to be more effective if supported by local community-based programmes involving all relevant stakeholders.

3) Effective enforcement of legislation such as on drink driving has been shown to be effective in reducing harm. It is also essential that existing legislation on minimum Legal Purchasing Age be enforced and this should be backed up by server training for bar and retail staff.

4) Education and information campaigns can be effective as part of a broader harm-reduction strategy. Evidence shows that education will be most effective when clear goals are established; campaigns are targeted to the audiences most at risk, programmes are realistic when considering their audience needs; and education is part of a broader community approach.

5) Effective examples developed in public/private partnership include a number of initiatives:

- To discourage underage drinking and enforce legal purchasing age: e.g., awareness campaigns on legal purchasing age and sanctions for infringements; education programmes to help young people resist peer-pressure, social norming campaigns, support for parents, actions during nightlife.
- To promote responsible drinking: e.g. consumer information on responsible drinking guidelines (including for pregnant women). Interactive tools, with relevant messages talking directly to the consumers, including tips to adopt a responsible behaviour.
- To discourage drink-driving: e.g., designated driver campaigns, promotion of alternative transportation, easy access to breathalyzers, server training and more public transport at night,.
- To promote responsible service of alcohol through training: development of knowledge and skills of those selling/serving alcoholic beverages on how to implement the law (e.g., not serving people under the legal purchasing age or intoxicated people) and how to promote a safe drinking environment.
- To minimize harm at workplace: e.g., adoption of specific alcohol policy, including road safety plans.
- Support to health professionals both through their primary education and long-life vocational training.
- Brief interventions in emergency rooms

6) In addition, effective industry self-regulation and co-regulation of marketing is also important to prevent marketing that encourages irresponsible drinking patterns. .

Full text: Nr. 126

FEBED (Federation of Belgian Drinkwholesalers) - member of CEGROBB

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.febed.be>

FEBED is representing 650 drinkwholesalers in Belgium and deliver, through her members, 75% of the existing number of horeca-outlets.

To be effective, a strategy for the reduction of alcohol-related harm has to:

- be understandable for everybody
- make a distinction between alcohol consumption and alcohol misuse
- take in account the culture and/or tradition of people
- be linked to education (schools/parents/...) and training
- be based on evidence and practice
- stimulate responsible behaviour
- target the problems
- identify the target groups

For the reasons, mentioned above, FeBeD (via CEGROBB) is member of the Alcohol and Health Forum. This Forum is a good initiative to create a common platform for a lot of stakeholders at EU level to take actions for alcohol mis-use/harm.

FeBeD is associated partner (CEGROBB is co-owner) for the commitment "Respect 16", submitted by the Belgian Brewers. This campaign is designed to increase the awareness concerning restrictions for serving and selling alcohol to youngsters (<16y). The main ideas are:

- encourage responsibility of retailers, bar staff, restaurateurs,...

- inform the concerned parties of how to refuse alcohol to youngsters on a respectful way
- inform the general public, the youngsters and their parents about the risks of underage drinking

FED. Ho.Re.Ca Vlaanderen

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.fedhorecavlaanderen.be>

Summary:

FED. Ho.Re.Ca Vlaanderen is a member of the Arnolus Group. This is a group set up on the initiative of the Belgian brewer federation. The group aims at contributing in the prevention against alcohol abuse and a promotion of judicious alcohol consumption. Besides the Belgian breweries are also the federations of the horeca and distribution companies member of the Arnoldus Group.

On 12 mai 2005 the covenant concerning behaviour and publicity concerning alcoholic drinks was signed together with the minister of public health.

The covenant is the proof that all professional associations concerned from the sector of beer and alcoholic drinks take their social responsibility. Together with the government one reaches an efficient self-regulation, which is enforceable and sanctionable and where all consumers are protected, especially the young people, in an effective manner. The form and the scope of this covenant is unique and offers an effectiveness larger than a traditional legal framework.

FED. Ho.Re.Ca Vlaanderen has always been and will stay committed to promoting this covenant to its members.

Link to further information about the covenant: <http://www.beerparadise.be/emc.asp?pageId=340> (in dutch)

In Belgium the age limit for serving and selling alcoholic drinks is 16, imposed by law. The covenant contains a number of provisions concerning publicity for alcoholic drinks with respect to minors.

In the fight against drinking and driving, the Arnoldus Group has cooperated in a partnership with the Belgian institute for traffic safety (BIVV) for the development of the "Bob" campaign, which is a great success (significant decrease in traffic casualties). Link to further information about the "Bob" campaign: <http://www.bob.be/index.htm> (in dutch or french)

Finally, Inbev Belgium has also set up a sensibilisation campaign for the respect of the minimum age of 16 for the consumption of beer: "respect 16". Link to further information: <http://www.respect16.be/nl/index.cfm> (in dutch)

Full text: Nr. 115

Federación Española de Bebidas Espirituosas

Industria del alcohol, comercio y agricultura

País: Spain

Página web: <http://www.febe.es>

Resumen de la contribución:

En FEBE fomentamos la responsabilidad en el consumo de nuestros productos, mediante la información a los consumidores con el uso de nuevas tecnologías (www.consumo-responsable.es), mediante formación a los camareros (Tu sirves, tu decides). Además desarrolla programas de prevención para luchar contra los accidentes de tráfico (Programas los noc-turnos). Además apoya a la Fundación Alcohol y Sociedad en un ambicioso programa escolar que demuestra que la educación es la mejor manera de cambiar los comportamientos.

Contribución íntegra: Nr. 11

Forum der Deutschen Weinwirtschaft

Alcohol Industry, trade and agriculture

Country: Germany

Summary:

Forum der Deutschen Weinwirtschaft, Bonn, Germany

14.11.2008

The „Forum der Deutschen Weinwirtschaft“ represents the entire German wine sector and we are determined to play a constructive role in reducing alcohol misuse and alcohol-related harm.

However, it should be emphasized that the majority of wine drinkers consume wine responsibly and as part of a healthy lifestyle.

In our opinion, effective and realistic measures to reduce alcohol related harm should

- distinguish between alcohol consumption and alcohol misuse
- take into account the various regional, cultural and traditional differences;
- target the risk groups;
- focus on and encourage responsible drinking pattern;
- be evidence-based;
- recognise the importance of education;
- integrate all relevant stakeholders, including the economic partners/industry;
- recognize the effectiveness of industry self-regulation;
- support the enforcement of existing laws and regulations.

The goal is not to establish an alcohol-free society but a society where alcoholic beverages are consumed in a responsible manner and where moderate drinking pattern are established as a social norm. In this context, the pleasure and health benefits of moderate wine consumption have to be recognized. We oppose a one-size-fits-all approach with population based restrictions such as taxation, commercial communications and availability aiming to reduce the alcohol consumption of society as a whole.

Educating consumers and providing them with accurate information will enable them to make responsible drinking decisions. We support prevention programs tailored to risk groups such as pregnant women, children, young people and drivers.

Commitment to collaboration and social responsibility

The German Wine sector is committed to collaborate with WHO, Member States and others to tackle alcohol misuse and related harm. Our commitment to the Alcohol & Health Forum –a common European platform for all stakeholders- is implementing the pan European programme -“Wine in Moderation”. It aims to educate about and to reduce the risks of alcohol misuse. Topics include wine as an agricultural product with a long tradition and culture, responsible drinking pattern, moderate wine consumption as part of a healthy lifestyle, relevant existing laws, national self regulation codes. Initially, the target group for this programme are trainees of the wine and sparkling wine sector at trade schools, sommeliers schools, colleges and universities as multipliers.

For more than a decade, so long before the WINEinMODERATION initiative, “Guidelines For Responsible Wine Consumption” have been disseminated by the German Wine Sector. These guidelines are included in all seminars for health professionals such as physicians and nutritionists.

Full text: Nr. 282

FORUM PSR

Alcohol Industry, trade and agriculture

Country: Czech Republic

Web site: <http://www.forum-psr.cz>

Summary:

According to our opinion and experience we believe that the best approach to the reduction of harmful use of alcohol is targeted prevention and education, which goes hand in hand with the enforcement of existing reasonable laws (reasonable means, that there is no significant gap between the practise and the law itself).

Full text: Nr. 284

German Advertising Council

Alcohol Industry, trade and agriculture

Country: Germany

Web site: <http://www.werberat.de>

Summary:

The German Advertising Council handles citizens' complaints regarding individual advertisements – including complaints about commercials for alcoholic drinks.

The Council, which is funded by 44 organisations allied in the German Advertising Federation (ZAW), develops and applies codes of conduct such as its code on advertising for alcoholic beverages. Member organisations include alcohol producers associations and alcohol importers, the whole media- and advertising agencies- sectors. The

German Advertising Council first issued its Code of Conduct on Commercial Communication for Alcoholic Beverages in 1976. In 1986, the European Commission incorporated the Code into the EU 'Television Without Frontiers' directive. The scope of the Code was extended by resolution of the ZAW member associations to include teleshopping in 1998 and to means of all commercial communication in general in 2005, "media neutral approach".

Alcohol and alcohol abuse continue to be extremely topical subjects for discussion in our society today; it can be positioned between enjoyment and risk, between damnation and euphoria, between well-being and selfdestruction. The vast majority of persons in Germany consume alcoholic beverages responsibly without harming themselves or others. In this context the advertising industry is of the firm opinion that commercial communication is a fundamental and indispensable part of free and fair competition. Recognising that harmful consumption of alcoholic beverages can have serious consequences for the consumers, their families and friends, and for society as a whole, the advertising industry is fully aware of its responsibilities when promoting alcoholic beverages, takes them seriously and acts accordingly. Core element of the advertising industrie's actions is a well-functioning system of advertising self-regulation. This has been improved within the last decades and will be further developed in the future.

The European Unions commissioner Viviane Reeding stated in a speech on September 2nd 2007 in Liverpool that in the area of advertising self regulation has made enormous progress. She expressly said that therefore: "The increasing sense of responsibility of the industry could in my view lead to deregulation in the field of advertising".

From a global perspective, we strongly believe that the most effective approach needs to reflect: the diversity of the social and cultural circumstances of the nations worldwide. A one-size-fits all approach can not be successful when trying to reduce alcohol-related harm worldwide. Each nation has to tailor their national approaches based on its particular economic, social and cultural contexts. In particular with regard to the advertising and commercial communications for alcoholic beverages each measure has to be conducted within the context of the existing legal, cultural and social enviroment. There are different ways for each nation to achieve the optimal solution for its circumstances.

Never the less it is appropriate to exchange views and experiences on a broader level but a single global measure would be contra productive.

For the advertising sector we highly recommend to encourage the set up and the further developing of self regulatory systems as a global approach. Where advertising self regulation exists it works sufficiently as a prompt and effective way of preventing irresponsible commercial communication.

Full text: Nr. 164

Heineken International BV

Alcohol Industry, trade and agriculture

Country: Netherlands

Web site: <http://www.heinekeninternational.com>

No summary available.

Full text: Nr. 281

InBev

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.inbev.com>

Summary:

InBev firmly believes in the importance of promoting responsible drinking and fighting alcohol misuse. Responsible consumption is not only more favorable for individuals and society as a whole; it is also in the long-term interest of our company and the reputation and commercial health of its brands.

InBev believes in promoting responsible drinking, a drinking pattern demonstrated by the vast majority of our consumers. We do not condone inappropriate drinking: we have a clear position against drink driving, against drinking under the legal drinking age, against drinking when pregnant or drinking without moderation ('binge drinking').

We do not, however, believe in measures that are aimed at lowering the overall alcohol consumption in the hope that at least part of the misuse might also be lowered. Such lack of targeting is most likely to have the biggest impact on those who do not drink in an unhealthy or irresponsible way, without really having an impact on those with negative drinking patterns. We cannot support strategies which seek to de-normalize responsible drinking; it needs to be

recognized that the majority of consumers drink responsibly and that there is a strong and consistent relationship between moderate consumption and health benefits.

We believe that any effective strategy aimed at reducing harmful use of alcohol will need to take into account the underlying causes to the harmful use: the drivers of alcohol misuse. The strategy needs to be targeted towards those drivers and will need to be multi-compound, existing of a combination of legislation, education and information and self-regulation. Different actors can play different roles, we know from experience that partnerships can be very effective. We also need to stress the importance of enforcement of existing laws.

In terms of reducing harmful use of alcohol; as a responsible brewer, we do two kinds of initiatives:

- general awareness raising about the importance of responsible drinking; and
- awareness raising and sometimes interventions re the dangers of irresponsible drinking

At the moment, we have at least one responsible drinkign program running in every market where we have a brewery. We feel that our programs illustrate that we can play a role in the fight against alcohol-related harm, along with other stakeholders. Through our programs, we also know that what works in one country, will not in others. There are different drinking cultures, different habits and they will need tailored approaches.

We can also share best practice in terms of ensuring that our advertising and marketing practice do not condone irresponsible drinking, so that they do not contradict the messages we are giving in the responsible drinking campaigns.

Full text: Nr. 294

Industrias La Constancia

Industria del alcohol, comercio y agricultura

País: El Salvador

Página web: <http://www.laconstancia.com>

Resumen de la contribución:

En Industrias La Constancia estamos convencidos que el uso responsable del alcohol es una actividad social y culturalmente aceptada y que forma parte de las costumbres de la mayoría de las personas adultas.

Desafortunadamente existen personas que utilizan mal el alcohol y que ponen en riesgo su salud y seguridad y la de otros.

Por esta razón, es necesario participar en procesos de consulta en los que se aborde esta problemática y se puedan reflejar todos los contextos nacionales, culturales y sociales, así como las iniciativas desarrolladas por diversas organizaciones en diferentes países.

Como empresa creemos que un factor determinante para la efectividad de las estrategias de alcohol es que todos los actores que se relacionan con el alcohol (productores, vendedores, padres de familia, consumidores y autoridades) deben formar parte activa dentro de las estrategias propuestas.

Contribución íntegra: Nr. 273

Kompania Piwowska SA

Alcohol Industry, trade and agriculture

Country: Poland

Web site: <http://www.kp.pl>

Summary:

Effective strategies should not be targeted at curbing the overall consumption of alcohol, but rather address certain risk areas, identified by the European Commission in its communication of 2006. They should be based on scientific knowledge identifying the reasons of harmful consumption, allowing to design robust and effective programs.

Kompania Piwowska together with the Association of Polish Brewers, as well as on its own, has been contributing to the reduction of the harmful use of alcohol for many years through long-term education programs supported with public communications, preventingf drink driving and minor access to alcohol.

Full text: Nr. 82

Korea Alcohol & Liquor Industry Association

Alcohol Industry, trade and agriculture

Country: Republic of Korea

Web site: <http://www.kalia.or.kr>

Summary:

Korea Alcohol & Liquor Industry Association (KALIA) is the only association representing major alcohol manufactures in Korea. KALIA has 13 multi alcohol (mostly Spirits such as So-ju) manufacturers, 2 beer manufacturers, 3 whiskey manufacturers and 10 ethanol manufacturers as members.

One of the main objectives of KALIA is to promote responsible drinking in Korea.

KALIA has conducted many activities for reducing alcohol related harm with its member companies, and of course KALIA will contribute to reduce alcohol related harm with WHO and Ministry of Health Korea.

KALIA believes that effective strategies to reduce alcohol related harm require followings

- Balanced approach considering regional circumstance, culture and drinking pattern
- Long term plan with step-by-step process
- Guarantee moderate drinkers' right and freedom to enjoy their responsible drinking

Full text: Nr. 252

Korea Alcohol Research Center

Alcohol Industry, trade and agriculture

Country: Republic of Korea

Web site: <http://karc.re.kr>

Control policy is not work well in oriental countries, and we need to develop alternatives in social lives, self-leadership(individual perspective), and self regulation(firm perspective) methodology.

1. Education of scientific knowledge, leadership training, campaign for reducing the harm, self-regulation for safer use etc.
2. Stress minimization, reinforcement of cultural activities like as music, dance, exercise, play etc. in the leisure time etc.
3. Research, survey for reducing the harm at school and workplace, national campaign etc.

Miller Brands UK Ltd

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Summary:

1. What are your views on effective strategies to reduce alcohol-related harm?

Effective strategies should:

- Incorporate stakeholders from industry (including retailers, media, producers and others), government, civil society, NGOs and others taking joint responsibility.
- Incorporate individual responsibility as a key aspect.
- Should be based on transparent evidence for Government and others to evaluate within the context of their national culture and circumstances.
- Should be relevant to long-term aims to educate and inform consumers and to encourage people to make informed choices in relation to alcohol whilst not unnecessarily punishing the majority of consumers that enjoy alcohol as part of their national culture in a way that is safe, sensible and social.
- Incorporate a flexible menu of policy interventions that can be adapted to national contexts.
- Should be based on long-term sustainable solutions and not for short-term political or economic gain whilst mindful of the positive economic and social contribution that alcohol can play in national and social contexts and the potential for unintended consequences of policy decisions.

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

Best ways to reduce harmful use of alcohol:

- Improved guidance for healthcare professionals on dealing with alcohol-related harm.
- Providing accurate and balanced information about alcohol consumption.
- Educating consumers through a variety of media on developing healthy attitudes to responsible alcohol consumption.
- Developing multi-stakeholder partnerships to lead innovative and targeted interventions.

- Including individual responsibility as part of any messaging.
 - Advocating policies that discourage the informal alcohol market and do not steer consumers to illicit products.
 - Ensuring retailers, amongst other stakeholders, are involved in interventions.
 - Ensuring the effective enforcement of existing laws to prevent alcohol harm and abuse.
3. In what ways can you or your organisation contribute to reduce the harmful use of alcohol?
- Providing accurate and balanced information about alcohol consumption to our consumers, including online information and best practice in consumer information on our labelling and packaging.
 - Working in partnerships with others to address alcohol responsibility issues including: youth access prevention, irresponsible consumption, drink driving, and reminding consumers of health and other societal considerations of alcohol consumption.
 - Establishing workplace policies and actions that reinforce high levels of employee conduct in relation to alcohol consumption.
 - Ensuring our marketing meets best practice in terms of responsibility messaging and adherence to both mandatory and voluntary regulations and codes in both spirit and letter.
 - Sharing best practice both within our company and among wider stakeholders.
 - Leveraging industry capabilities, in partnership with other stakeholders, and accessing consumers with messages and information to foster positive attitudes and choices with regard to alcohol.

Full text: Nr. 191

MillerCoors

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.millercoors.com>

Summary:

When it comes to alcohol responsibility MillerCoors has a single goal: Responsible enjoyment and use of our products by consumers; and we firmly believe there is a role for the alcohol industry to play in reducing the irresponsible consumption of alcohol beverages, which increases various well known risks of harm to the consumer and to others. We carry out this significant role by providing effective solutions to deal with the many challenges arising from access of alcohol to underage, irresponsible over consumption and driving drunk. We do this through getting involved and working with industry stakeholders, concerned organizations in our communities where we do business, and leaders in education and government representing important perspectives and valued experiences. Our partnerships focus on working together on youth access prevention, issues arising from irresponsible over-consumption and driving drunk. Furthermore, we are committed to meaningful self-regulatory practices in selling and marketing our products, and we advocate for effective public policy in legislative and regulatory bodies of our federal government and in each of the various states.

MillerCoors ensures all its products are clearly labeled to present consumers with information about the type of alcohol beverage they consume, and we strictly comply with all federal laws and regulations that prohibit use of misleading information and graphics, require clear warnings, and provide consistent information about the alcohol content when it is displayed on labels.

We believe we are part of the solutions to reducing alcohol-related harm in the U.S. and Puerto Rico, and we will continue to join our efforts with other key stakeholders to make an even greater impact in the communities where we work and live.

Full text: Nr. 298

National Beer Wholesalers Association

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://nbwa.org>

Summary:

I am writing to you and your committee as the World Health Organization (WHO) prepares to consider a global strategy to combat the harmful use of alcohol. I respectfully caution you and the WHO to remember the vast difference in alcohol practices between countries; the diverse institutional structures for regulating alcohol beverage manufacturing, distribution, sales, and consumption; and the particular historical dynamics by which national drinking cultures and regulation have evolved. Different countries and cultures have varied alcoholic beverage

traditions and problems with abuse. They have created diverse methods of response and intervention through regulation and behavior modification.

Full text: Nr. 180

Pernod Ricard S.A.

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: <http://www.pernod-ricard.com>

Summary:

Pernod Ricard enjoys a proud tradition of corporate social responsibility activity, first in its home country of France, and now in many member states around the world. This was most recently recognised by the Swedish Government during our recent acquisition of Vin & Sprit, a Swedish state company. The Swedish Government designated a socially responsible corporate profile as one of the criteria for a successful bid.

The Company has developed a growing programme of responsible drinking initiatives, as well as promoting a better understanding of alcoholic beverages and how they should be consumed. Pernod Ricard appreciates that our business can only be sustainable over the long-term if the drinks industry takes action to mitigate the potentially negative social consequences associated with alcohol abuse.

In developing an alcohol strategy, it is important to focus on risky drinking patterns rather than concentrating on overall alcohol consumption. The strategy should also factor in the local drinking cultures so that there is an understanding of drinking patterns and what types of beverages are being consumed. Ultimately, consumers need the appropriate information on alcohol in order to make informed drinking choices.

The WHO should avoid drafting a single strategy for all member states, and permit local flexibility in the final strategy. At the same time, member states should consider improving its enforcement of its laws against the production and distribution of illicit alcohol products. Education tools should be developed to inform consumers on the facts about alcohol. The WHO should also consider utilising the social norming approach when addressing drinking by young people.

Pernod Ricard continues to expand its many programmes around the world to promote responsible drinking. We look forward to working with new partners in the future. Separately, Pernod Ricard works within the International Federation of Spirits Producers (IFSP) to investigate and, eventually, eliminate the production and distribution of illicit alcoholic drinks. This can only be done in cooperation with the local law enforcement officials.

We at Pernod Ricard stand ready to work with other interested stakeholders in developing new initiatives to promote responsible and intelligent drinking decisions.

Full text: Nr. 174

Pivovary Topvar, a.s.

Alcohol Industry, trade and agriculture

Country: Slovakia

Web site: www.pivovarytopvar.sk

1. What are your views on effective strategies to reduce alcohol-related harm?

Effective strategies should be based on reducing the harmful effects of irresponsible alcohol consumption not overall consumption of alcohol. Targeted interventions to combat alcohol abuse should be a key focus. In the Slovak Republic it is legal for persons of 18 years of age to drink alcohol, as adults they are best placed to decide when and how much to drink depending on their particular circumstances at that moment. For some people and some occasions that will mean not to drink at all, particularly when driving or taking medication. There is an amount of personal responsibility that must be taken into consideration as well as society's role in holding individuals accountable for their actions. Irresponsible alcohol consumption benefits no-one and is certainly not in the interests of the Company Pivovary Topvar. It is illegal in the Slovak Republic to sell alcohol to youths. Pivovary Topvar discourage sales to minors through working with their customers and displaying responsible messages on packaging. Enforcement of these laws are vitally important in effective strategies to reduce alcohol-related harm as well as parental education and guidance.

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

The best way to reduce problems related to harmful use of alcohol is first of all to enforce national legislation. http://www.infodrogy.sk/index.cfm?module=ActiveWeb&page=WebPage&s=zakon_c_219/1996_z. This legislation should go hand in hand with the self regulatory activities of alcohol producers. They should also be

viewed as a valuable stakeholder and a responsible partner to help raise awareness through educational campaigns in the area of:

- Responsible Drinking
- Drink and Drive
- Pregnancy and Alcohol
- Youth Access Prevention

3. In what ways can you or your organization contribute to reduce the harmful use of alcohol?

Our organisation is already contributing to the reduction of harmful use of alcohol through educational campaigns. We communicate responsible messages on all our products and also point of sale material. The main slogan of the campaign is “Consumption of alcoholic beverages allowed from the age of 18”. This message is accompanied by a visible and recognisable stamp. We also communicate this message on the main stage at all the festivals we organise, or participate at. We also use moderators to stress to young people they are not allowed to drink alcohol when they are under the legal drinking age. This goes together with discouraging Drinking and Driving. We have launched the project 'Pro Mole Info' where people can calculate the level of alcohol in their blood by sending SMS, on Internet or through WAP. This is being distributed in all our off trade operations and also on all festivals we participate at. This project is done together with The Ministry of Transport of The Slovak Republic – Road Safety Dept.

Responsible alcohol consumption is also going to be communicated through all our marketing, our web pages and also a dedicated web page on responsible consumption.

Plzenský Prazdroj, a.s.

Alcohol Industry, trade and agriculture

Country: Czech Republic

Web site: <http://www.prazdroj.cz>

Summary:

1. What are your views on effective strategies to reduce alcohol-related harm?

Effective strategies must be strictly evidence based and balanced. It must be regularly evaluated. Effective strategies have to reflect all differences among countries, nations, markets and discussed with all stakeholders. It is necessary to clearly distinguish between illegally produced alcohol and legally produced alcohol.

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

The best way to reduce harmful use of alcohol is prevention. It is necessary to provide accurate and balanced information about alcohol consumption to consumers. Such information should be easily accessible. All officially published information must be based on long term scientific researches provided by independent institutions. It is necessary to educate medical professionals to enable them to communicate the risks of harmful drinking to their clients. Educational campaigns addressing wide range of customers are an effective tool as well.

3. In what ways can you or your organisation contribute to reduce the harmful use of alcohol?

Plzenský Prazdroj provides accurate information on general alcohol consumption to all stakeholders, especially to consumers. Promoting responsible alcohol consumption is of our high priority.

All commercial communication is strictly monitored through self regulation system. The code of commercial communication prohibits advertising addressed to underage or any form of aggressive advertising. There have been no consumer complaints in the last 5 years in the Czech Republic. We expect our employees to aspire to high levels of conduct in relation to alcohol consumption. Clear policy and guidelines are in place.

We engage stakeholders and work collectively with them to address irresponsible consumption, focusing mainly on issues such as drinking and driving and underage drinking. The text message service Promile.INFO organised in partnership with local NGO Sananim has been educating consumers for 3 years. This service provides drivers with information about blood alcohol content after drinking of alcohol and time to be sober again. Education of customers (clubs owners and employees) is ensured by Safer Clubbing programme organised in cooperation with local municipality. The programme commenced in 2008 and addresses under age drinking and violence.

Polish Spirits Industry

Alcohol Industry, trade and agriculture

Country: Poland

Web site: <http://www.pps.waw.pl>

No summary available. Full text: Nr. 51

Rexam Beverage Can North America,

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.rexam.com>

Rexam is the largest beverage can manufacturer in the world. One of its key customers is Anheuser-Busch. Rexam is committed to establishing policies that support reduction in alcohol abuse. In fact, in addition to consistent employee assistance programs, we recently initiated a policy where there is an alcohol limit for all company-sponsored events. The company would compensate and approve no more than two drinks during dinner. Our leadership is modeling this behavior, setting the tone for professional, respectable conduct across our stakeholder groups in order to sustain our company and employee reputation.

SABMiller India

Alcohol Industry, trade and agriculture

Country: India

No summary available.

Full text: Nr. 141

SABMiller plc

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: <http://www.sabmiller.com>

Summary:

SABMiller welcomes this opportunity to introduce its views on reducing harmful use of alcohol. We hope to engage in an ongoing exchange with the WHO, its members, and all relevant stakeholders, to develop and implement a successful global strategy.

Effective alcohol-related policies and strategies must address local realities, including the importance of markets for informal and illicit alcohol. To reduce harms related to informal alcohol, reliable data must be collected, and balanced and transparent information on best practices widely disseminated. Policies should be designed to encourage regulated production of a wide range of quality alcohol beverages that are affordable to adults who choose to drink – offering an alternative to informal alcohol and the additional public health risks it brings. We attach a chart describing the spectrum of beverage alcohol in Sub-Saharan Africa – including the supply of informal alcohol, which will not subside through taxation and restrictions on regulated products.

Effective strategies must be rooted in comprehensive national and sub-national alcohol policies, crafted through participatory processes that engage stakeholders from all relevant sectors – including health, law enforcement, justice, trade, and education, as well as NGOs, producers, and retailers. Broad participation brings the benefits and checks and balances of a range of experience and perspectives, raises awareness among participants, instills political commitment, and lays the ground for successful implementation of the policy.

We concur with WHO that health sector responses are effective and cost effective. Developing adaptable public health sector tools and making them widely available is among WHO's core competencies, and will be a critical part of the WHO's contribution to the global strategy.

With its expertise, reputation and global reach, the WHO's role is vital. WHO can promote broad participation and assist members' efforts to develop and implement national alcohol policies. WHO can facilitate public-private partnerships to: (i) collect and make available transparent data, (ii) design and disseminate adaptable health sector tools to identify and treat harmful use of alcohol, and (iii) collect and disseminate best practices, supported by transparent data sets for ease of analysis and transferability.

With their intimate knowledge of local markets around the world, and experience implementing alcohol-harm reduction programmes, producers like SABMiller also have a vital role, and should engage and partner with the WHO, its members, and other stakeholders to: (i) offer on-the-ground expertise and commitment to the development, implementation, and evolution of comprehensive national alcohol policies, (ii) collect and make available transparent data, (iii) translate policies and data into programmes that effectively respond to local realities, (iv) identify and share best practices and related data, and (v) commit to responsible business practices.

Indeed, SABMiller believes that, notwithstanding the success of its alcohol harm reduction programmes, its most significant contribution to reducing the harmful use of alcohol stems from the deep social and economic benefits it

brings to host countries, promoting achievement of the UN Millennium Development Goals, and helping to eradicate the extreme deprivation that fosters alcohol abuse.

Finally, we would encourage the WHO to give full effect to member states' request in resolution WHA61.4 by consulting with stakeholders throughout the development and implementation of the global strategy, on all ways they could contribute to reducing harmful use of alcohol. The WHO's recent roundtable consultation with economic operators covered only three of the nine action points described in the Secretariat's report – though participants sought to discuss other areas where they could offer meaningful input – including reducing harms of informal alcohol.

Inclusive, participatory processes are necessary to develop successful alcohol policies – not only for national approaches, but also for the global strategy. Multi-stakeholder debate incorporates the checks and balances of a broad range of experience and perspectives, and ensures the necessary buy-in for successful implementation. We hope the WHO will consider hosting multi-stakeholder consultations to address each of the action points to reduce harmful use of alcohol – and that it will host another public hearing to solicit comments once the draft of the global strategy has been prepared.

Full text: Nr. 288

Stichting Verantwoord Alcoholgebruik STIVA

Alcohol Industry, trade and agriculture

Country: Netherlands

Web site: <http://www.stiva.nl>

Summary:

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

- Treat the alcohol industry as a partner.
- Know the problem and take pragmatic measures
- Emphasize on pragmatic solutions - best results especially in public-private partnership

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

Bring ideas together. The EU Alcohol and Health Forum is a good example of how this can be done.

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

STIVA:

1. Enforces the national Advertising Code for Alcoholic beverages; by advising the alcohol industry how to uphold this Code both by; by giving training to marketing departments.

www.alcoholcode.nl (website dedicated to informing 'users' of the code), www.stiva.nl

2. Uses the slogan: Alcohol onder de 16, natuurlijk niet (Alcohol under 16, certainly not) Still a lot of parents in the Netherlands are not aware of the legal purchasing age of 16 years and moreover if they do know the LPA they don't think it's necessary to be strict on their children. The slogan is shown in every television advert from producers and importers for alcoholic beverages and in printed advertising for alcoholic beverages with less than 15% abv. There is also a website supporting the slogan: www.alcoholonderde16natuurlijknie.nl

3. Funds a campaign in retail called: "Drank kopen kent zijn leeftijd". (Buying alcohol means knowing the legal purchasing age).

www.pvad.nl

4. Participates in the Dutch catering industry campaign: "Eerst denken, dan schenken". (Think before you serve).

5. Participates intensively in the Dutch designated driver campaign called BOB. www.veiligverkeernederland.nl, www.jebenttopbob.nl, www.teamalert.nl

6. Puts the message across that people of a legal drinking age should only drink moderately. This is a very old and well known STIVA slogan in the Netherlands called: "Geniet, maar drink met mate". (Enjoy, but drink moderately). www.genietmaardrinkmetmate.nl

7. Has created a website to help parents to communicate with their children on subjects relating to alcohol, such as legal purchasing age, when not to drink, information on alcoholic beverages, etc. STIVA has started this initiative in the Netherlands.

www.pratenoveralcohol.nl

Full text: Nr. 258

The Brewers of Europe

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.thebrewersofeurope.eu>

Summary:

The Brewers of Europe represents approximately 95% of the EU's beer production. In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Understand and target the problems;
- Identify and classify drivers of behaviour;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers choose their drink on the basis of numerous factors, not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches;
- The need for WHO to encourage screening and brief interventions in the health-sector.

An interesting initiative, and one which could be considered as a template for similar platforms at all levels, is the EU Alcohol and Health Forum, which aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm.

The Brewers of Europe, its member associations and companies are by far the number one committers to the Forum, with over a third coming from the brewing sector - 36 in total. These commitments are aimed at addressing alcohol misuse-related issues as diverse as binge drinking, alcohol and pregnancy, underage drinking, and drink-driving. An important feature is also the number and diversity of partnerships with those who wish to support, finance and associate themselves with these commitments. For example:

- National, regional and local governments;
- Road safety and police authorities;
- Civil society;
- Young people's groups (18-30);
- Health and medical associations;
- Consumer Groups;
- Self-regulatory organisations;
- Media.

The Brewers of Europe and its members remain committed to developing and further improving these campaigns, and also to seeing to it that their implementation is monitored and evaluated. In this way best practice can gain further support and be transferred and adapted to tackle similar alcohol misuse-related problems in other countries.

Concrete recent examples of the leading role played by The Brewers of Europe include:-

- 25 commitments under the EU Alcohol and Health Forum;
- Signing the Alcohol and Health Forum's Charter;
- Contributing to the Worldwide Brewing Alliance's (WBA) Drinking and Driving Reports;
- Contributing 300 of the initiatives identified in the WBA's "Global social responsibility initiatives" publication;
- Signing the European Road Safety Charter;
- Founding the independent European Research Advisory Board.

Full text: Nr. 63

The British Beer & Pub Association

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: <http://www.beerandpub.com>

Summary:

The British Beer & Pub Association represents about 98% of the UK beer production and about two thirds of pub owning Companies.

To have an effective and sustainable impact on the harms caused by the misuse of alcohol, interventions should:

- Be evidence based and practical;
- Be targeted towards misuse and the misuser rather than alcohol consumption per se;
- Recognise and account for the diversity of societies, cultures and traditions;
- Recognise and account for the public health benefits of alcohol consumption – medical and psycho-social;
- Be founded on the importance of education;
- Involve all relevant stakeholders.

Consumer access to and enjoyment of alcohol commonly takes place through the retail environment. The framework that surrounds alcohol retailing plays a vital role in tackling and reducing harms. Such a framework should:

- Clearly establish the shared responsibility of the leisure and hospitality sector and other retailers (shops, supermarkets etc);
- Establish partnership between legislators and business – recognising business developed good practice as an effective mechanism for rapidly deploying flexible solutions;
- Be based on a formal retail licensing system that establishes appropriate checks and balances on retail practices together with appropriate sanctions and penalties;
- Establish a legal minimum age for the sale of alcohol;
- Be complemented by a legal framework that clearly defines expected standards of individual behaviour;
- Ensure that the legal and regulatory system is transparent and visibly enforced at both the corporate and individual levels;
- Achieve a balance between a formal legal and regulatory framework and effective self-regulation;
- Encourage a training structure that enhances the professionalism of the retail sector;
- Recognise that alcohol misuse can take place at home and around the home as well as when people are out socialising in the leisure and hospitality sector.

The BBPA has a recognised reputation for the development and implementation of good practice standards throughout the sector. The Association has a long-standing track record of active and effective partnership working with local and regional authorities and national government.

Concrete recent examples of the leading role played by The British Beer & Pub Association include:-

- Financial support for independent medical research;
- Promotion of the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks in the UK which has brought together all the existing codes;
- Standards on Point of Sale Promotions;
- Challenge 21 which supports greater enforcement of laws preventing underage sales;
- Endorsement of the Proof of Age Standards Scheme;
- Backing of Best Bar None which aims to award and encourage high standards in the licensed trade;
- Support for Business Improvement Districts (BIDs);
- Support for Drinkaware ;
- Funding for National Pubwatch which aims to achieve a safe and secure social drinking environment;
- Support for a Risk Assessment tool for pub safety.

Full text: Nr. 112

The European Spirits Organisation - CEPS

Alcohol Industry, trade and agriculture

Country: Belgium

Web site: <http://www.europeanspirits.org>

Summary:

The European Spirits Organisation – CEPS is the representative body for the spirits industry at the European level. Its membership comprises 36 national associations representing the industry in 29 countries, as well as a group of leading spirits producing companies.

Reducing alcohol related harm is one of the EU spirits industry's key objectives which it seeks to implement via a host of targeted initiatives. To demonstrate its commitment to the fight against alcohol misuse, the European Spirits Organisation adopted its Charter on Responsible Alcohol Consumption in November 2005. Each year, a report on progress made, independently audited, is made public. The European Spirits Organisation - CEPS welcomed the European strategy to tackle alcohol related harm adopted in 2006 which represents a balanced approach to tackling alcohol related harm across Europe, identifies specific areas for action, recognises the role of the industry and fosters partnership with other stakeholders via the Alcohol and Health Forum, where CEPS plays an active role.

The issue of alcohol related harm is complex and there is no “one-size-fits-all” approach, Members of the WHO must be able to adapt strategies to the national/local needs. The European Spirits Organisation – CEPS believes that successful strategies to address alcohol-related harm need to be culturally relevant, targeted to address risky drinking patterns and look at how to ensure proper enforcement of existing rules. It has been demonstrated that better consumer information, education and awareness campaigns are effective approaches to tackle alcohol misuse, as well as proper implementation of industry’s commitments to responsible marketing, via self-regulatory codes and enforcement mechanism.

The European Spirits Organisation – CEPS supports measures to tackle illicit alcohol production, and strongly opposes any increased tax burden for its products which would encourage illicit production and have no demonstrated impact on harm reduction

Full text: Nr. 144

The Federation of the Finnish Brewing and Soft Drinks Industries

Alcohol Industry, trade and agriculture

Country: Finland

Web site: <http://panimoliitto.fi>

Summary:

The Federation of the Finnish Brewing and Soft Drinks Industries represents approximately 95% of the Finland's beer production. In our opinion, sustainable, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Understand and target the problems;
- Identify and classify drivers of behaviour;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers choose their drink on the basis of numerous factors, not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore, the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches;
- The need for WHO to encourage screening and brief interventions in the health-sector.

An interesting initiative, and one which could be considered as a template for similar platforms at all levels, is the EU Alcohol and Health Forum, which aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm.

The Federation of the Finnish Brewing and Soft Drinks Industries as a member of the Brewers of Europe is one of the committers to the Forum. Our commitment "Drunk You're fool" -education campaign is aimed at binge drinking in Finland.

Full text: Nr. 83

The Scotch Whisky Association

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: <http://www.scotch-whisky.org.uk>

Summary:

The Scotch Whisky Association welcomes the opportunity to make a submission to the World Health Organisation's online consultation on ways of reducing harmful use of alcohol.

The overwhelming majority of individuals who choose to drink do so because they enjoy it and because it is a sociable activity. They generally drink in an appropriate manner and not to excess, causing no impact to themselves or others. Their drinking pattern is often directed by the culture in which they live.

Focusing effort on changing culture to reduce harmful use requires a long term approach - there are no quick fixes such as high taxes as advocated by some. Effective strategies to reduce alcohol-related harm must be realistic with regards to timescale and be sympathetic to the culture of the country in which the initiatives are being implemented. It is important to focus on patterns of drinking so that those who choose to drink do so in an appropriate way.

There are certain key principles which we consider to be fundamental to reducing problems related to harmful use. These are:

- Targeted interventions towards those who misuse alcohol
- Better understanding of what drives individuals to drink to excess
- Recognition of cultural sensitivities
- Education
- Partnership working with all stakeholder groups
- Effective enforcement of legislation (e.g. legal purchase age, drink drive offences)

The Scotch Whisky Association represents producers. An important contribution producers can make is to ensure their brands are consistently marketed and promoted in a responsible manner across the globe. Scotch Whisky brands are governed by a strict Marketing Code. The Code will shortly become mandatory across the whole of the EU, and it already is regarded as best practice guidance for Scotch Whisky marketing and promotion globally. The Code is backed by a complaints panel, members of which are independent of the industry.

We also believe that through regular dialogue to exchange views and share best practice on initiatives and our experience of partnership working, we can help to drive standards.

Full text: Nr. 151

Unión de Cervecerías Peruanas Backus y Johnston S.A.A.

Industria del alcohol, comercio y agricultura

País: Peru

Página web: <http://www.backus.com.pe>

Résumé de la contribution no disponible.

Contribución íntegra: Nr. 185

Union of the Brewing Industry Employers in Poland – Polish Breweries

Alcohol Industry, trade and agriculture

Country: Poland

Web site: <http://www.browary-polskie.pl>

Summary:

Effective strategies need to:

- Be based on strong evidence and best practice
- Educate and encourage responsible behavior
- Take into account diversity of societies, traditions and cultures
- Engage all interested parties / stakeholders

From global perspective, the best ways to reduce problems related to harmful use of alcohol need to reflect:

- Individual approach of Member States

- Involvement of all stakeholders
- Fair and balanced approach between intervention and education

The Union's local initiatives cover:

- Submitting commitments on underage drinking, drinking and driving, self-regulation
- Joining the National Self-Regulation Organization
- Signing the European Road Safety Charter
- Establishing cooperation with local road safety and police authorities
- Setting up a collaboration with local Road Safety Partnership
- Conducting social campaigns (Alcohol – underage no access, Don't drink and drive)

Full text: Nr. 122

UNIZO FOOD RETAIL

Alcohol Industry, trade and agriculture

Country: Belgium

1. Make a difference between alcohol consumption and alcohol misuse. Recognise the importance of a global and positive - no repressive - approach: alcohol misuse is a problem of all the stakeholders and can't be solved by confronting industry and retailers with extra legislation and control. Try to encourage responsible behaviour in a broad social approach;
2. Promoting responsible consumption. Commercial communications may not encourage inappropriate drinking behaviours.
3. Sensitise in a positive way customers of the damage that misuse of alcohol may effect.

Verband der Brauereien Österreichs - Austrian Brewers Association

Alcohol Industry, trade and agriculture

Country: Austria

Web site: <http://www.bierserver.at>

Summary:

The Verband der Brauereien Österreichs (Austrian Brewers Association) represents the Austrian brewing industry.

Effective strategies to reduce alcohol-related harm need to

- Be evidence based and practical;
- Differentiate between moderate alcohol consumption and alcohol misuse;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider and respect national and regional societies, cultures and traditions;
- Take account of the fact that consumers are buying a specific beverage, not just alcohol, and selecting their beverage on the basis of numerous factors, not just alcoholic strength;
- Recognise the importance of prevention, especially education and training;
- Encourage responsible behaviour;
- Engage stakeholders through partnerships.

From a global perspective, therefore the most effective approach needs to reflect

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, to explore and identify effective approaches to alcohol policy;
- The need for to encourage screening and brief interventions in the health-sector.

An interesting initiative involving all relevant stakeholders is the EU Alcohol and Health Forum, launched at the initiative of the European Commission, which is based on a positive, action-oriented, multi-sectorial, multi-stakeholder approach to addressing the problems associated with inappropriate alcohol consumption. We trust that such an approach as the Alcohol and Health forum may be considered as a template for similar platforms at all different levels.

The Austrian Brewers Association has the issue of tackling alcohol misuse on the top of its agenda, and is - being a member of The Brewers of Europe - also committed towards the EU's Alcohol and Health Forum.

Furthermore the Austrian Brewers Association is involved in the national Austrian Alcohol Forum established by the Austrian Ministry of Health, Family and Youth.

Over the last years the Austrian Brewers Association has cooperated in different prevention and education programs with other stakeholders such as

- National, regional and local authorities;
- Road safety authorities;
- Driving schools;
- Civil society;
- Young people's groups (18-30);
- Health and medical associations;
- SROs;
- Horeca and Retailers.

Initiatives supported by the Austrian Brewers Association aimed at self-regulation, education, training, and tackling misuse, particularly with a view to addressing underage drinking, and include:

- "Kommunikationskodex der österreichischen Brauwirtschaft" which was signed by all Austrian Brewers;
- Youth Work of a Vienna Soccer Club – a project in cooperation with a psychiatrist;
- "Zero" – an internet game on the dangers of drinking and driving;
- "BierWissen" – comprehensive educational material for students;
- Beer & Health Symposium and leaflet "Bier und Gesundheit".

Full text: Nr. 111

Vin et Société

Industrie, commerce et agriculture en rapport avec l'alcool

Pays: France

Adresse du site Web: <http://www.vinet societe.fr>

Résumé de la contribution:

Vin & Société fédère tous les acteurs de la filière vitivinicole française et a pour mission de promouvoir une consommation qualitative, conforme aux repères de modération et aux normes de santé publique. Vin & Société initie un ensemble d'actions pour promouvoir un modèle de consommation responsable et soutient des actions citoyennes, notamment celles menées par les pouvoirs publics, pour lutter contre les conduites à risque. Notre travail s'intègre au Plan européen Vin et s'inspire de ce qui est fait au Québec par Educ'Alcool.

Pour réduire efficacement l'usage de l'alcool, il est important de prendre en compte les éléments suivants :

- l'éradication de toute consommation d'alcool n'est pas envisageable, les seules mesures d'interdit et de discrédit de l'alcool ont prouvé leur inefficacité sur l'usage nocif de l'alcool (voir période de la prohibition aux Etats-Unis), elles doivent être accompagnées de programmes d'éducation à la modération et au bien boire ;
- les conséquences de la consommation d'alcool dépendent du mode de consommation, si une consommation abusive est nocive, une consommation modérée, particulièrement de vin, peut avoir certains effets bénéfiques sur la santé ;
- ces modes de consommation doivent être remis dans leur contexte pour que l'on puisse trouver des solutions adaptées efficaces ;
- des études ont prouvé que les modes de consommation des différentes boissons alcoolisées sont fortement influencés par des facteurs culturels qui varient en fonction des régions, des pays.

Une approche mondiale pour réduire la consommation nocive d'alcool sera d'autant plus efficace qu'elle prendra en compte les points suivants :

- ce n'est pas la consommation d'alcool en elle-même qui pose problème mais la consommation abusive ;
- les mesures proposées doivent s'adapter aux différents contextes nationaux, culturels, religieux impactant sur le mode de consommation ;
- il existe différentes parties prenantes et notamment les opérateurs économiques dont le rôle prescripteur auprès des consommateurs doit être exploité ;
- l'approche constructive adoptée au niveau européen peut servir d'exemple pour une approche pluriculturelle.

En tant que producteurs, nous estimons pouvoir contribuer à la prévention des consommations à risque et à l'éducation à un mode de consommation responsable. En effet, nos actions nous permettent à la fois de sensibiliser

les consommateurs de vin à la consommation responsable mais aussi d'éduquer l'ensemble des professionnels de notre filière à un message de modération responsable auprès de leurs clientèles.

En 2008, nous avons plus particulièrement insisté sur deux actions :

- la diffusion d'éthylotests pour inciter les conducteurs à se tester avant de prendre le volant, dans le cadre d'un partenariat avec la Sécurité routière française.
- l'élaboration d'un site internet pour promouvoir la modération dans la consommation de vin : <http://vinetsociete.fr>.

En 2009, nous envisageons de mener les actions suivantes :

- un programme pédagogique pour sensibiliser les 12-15 ans aux risques liés à la consommation d'alcool.
- des outils de promotion de la consommation responsable (brochures, posters et autres visuels) seront mis à disposition des professionnels de la filière et de nos partenaires.

Contribution intégral: Nr. 278

Vinos de Chile A.G.

Alcohol Industry, trade and agriculture

Country: Chile

Web site: <http://www.vinosdechile.cl/>

REDUCING THE HARMFUL USE OF ALCOHOL IN CHILE

Vinas de Chile, the national trade association of the Chile Wine Industry, which represents 95% of the domestic and export production and sales of Chilean wine, is pleased to provide comments related to reducing the harmful use of alcohol.

We believe that local market public/private coordination is the most effective means of developing and implementing solutions to harmful use of alcohol. Chile has a unique culture and tradition related to alcohol beverages. We are very proud of our local wine, beer and spirits industry. Each sector benefits from the other sectors' self-regulatory efforts to reduce harmful use of alcohol. We also work closely with our government to fashion legislation to address the harmful use of alcohol.

The laws in Chile were developed to encourage the moderate consumption of alcohol and to limit the harmful use of alcohol products. To summarize key provisions of the law,

- There is a prohibition against selling alcohol to individuals under 18 years old.
- Strict driving measures.
- Consumption of alcohol in public places such as streets, squares, at sports arenas or game events is prohibited.
- Advertising of alcohol products on the Radio and TV is permitted only after 11pm at night.
- Alcoholic products cannot be sold in areas near to educational facilities.
- Only specially allowed specialty shops may sell alcoholic products after certain hours.
- A Governmental body in charge of examining the authenticity of the products which has strict regulations on the elaboration of products and of its ingredients.

Included in the law are national programs for the prevention of excessive drinking. This is a particularly important aspect of the Chilean commitment to limiting harmful use of alcohol.

Congress is currently considering new regulations to improve the present approach to the alcohol regime. The main area of focus is requiring warning labels on the products and advertising.

The need to focus on local factors related to drinking patterns and harmful use of alcohol is underscored by a simple fact that, unlike other countries, the sale and use of illicit or informal products, is not prevalent in Chilean society. Simply what works in Chile may not work in other countries. Locally developed and implemented strategies stand the best opportunity for producing meaningful reduction in the harmful use of alcohol.

Wine and Spirit Trade Association

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: <http://www.wsta.co.uk>

Summary:

The Wine and Spirit Trade Association (WSTA) fully recognises that there is a minority of the population which cause damage to their health and to the wider community through their misuse of alcohol. The industry believes in working in partnership with governments to tackle these serious problems and reduce harm from alcohol misuse.

In drawing up policies to reduce harm from problem drinkers, it is essential to base solutions on the facts and evidence of what works. It is also crucial, not least to maintain the vital support of the public, that policies are seen to be both effective and fair. While not underestimating the scale and seriousness of alcohol misuse, any strategy must recognise that the vast majority of people drink responsibly and that the majority of businesses behave in a responsible manner and should be seen as part of the solution.

We consider that any future policy development must be based on the principles of good policy making and should be:

- Evidence-based
- Fair
- Proportionate
- Effective
- Consistent
- Avoid unintended consequences

The WSTA believes that any effective strategy to address alcohol problems needs to be broad-based, involve a multi-component approach, and should be implemented in concert with other measures to address behavioural and social issues. Such an approach should involve more rigorous enforcement of existing laws designed to combat alcohol misuse and deploy the efforts of all community stakeholders to deliver cultural change.

Clearly, any global strategy must take account of the many cultures of the world and differing attitudes to alcohol. In some countries, for example, illicit trading of alcohol products is far more prevalent than any issues surrounding the alcohol misuse of those buying alcohol legally. Enforcement of the existing law must be the first priority for any strategy before any ameliorative approach can be explored.

Full text: Nr. 228

Wine Institute, Trade Association of California Wineries

Alcohol Industry, trade and agriculture

Country: United States of America

Web site: <http://www.wineinstitute.org>

Summary:

On behalf of more than 1,100 California winery members and affiliated businesses, Wine Institute engages in an active dialogue with policy leaders, educators and media, as well as health, social and environmental organizations to establish high standards for our agricultural and business practices. Each of the Wine Institute programs are designed to address specific populations and needs. Some are national, some are specific to a state or region and others are locally based. This directed program approach is critical to the success Wine Institute programs have experienced over the past 75 years.

Programs and efforts to reduce harmful use of alcohol should focus on the differences of the populations they seek to address. One program will not serve the goal nor will a series of centrally developed programs. In order to achieve the goal of reducing harmful use of alcohol governments, NGO's, economic operators, cultural and religious leaders must all work together to develop realistic programs that make a difference.

Full text: Nr. 93

Winemakers' Federation of Australia

Alcohol Industry, trade and agriculture

Country: Australia

Web site: <http://www.wfa.org.au>

Summary:

The Winemakers' Federation of Australia (WFA), provides policy leadership on the issues of business climate, social responsibility, environmental sustainability, innovation, trade, and benchmarking issues that are critical to the enduring viability of Australia's wineries.

The Australian wine sector welcomed WHA Resolution 61.4 on Strategies to Reduce the Harmful Use of Alcohol and the WFA, on behalf of the Australian wine sector, will positively contribute to the development of the global strategy at every opportunity.

The resolution identifies differences between Member States and the differences in policy responses therefore required to address the complexities associated with alcohol misuse. It is clear the most effective policies and programs will be long-term, tailored to specific circumstances at which they are directed, and must include a holistic consideration of potential unintended consequences, as well as intended outcomes. Put simply, one size does not fit all, and the suggested solution must not be more damaging than the problem it seeks to address.

WFA is committed to a regulatory regime to address misuse of alcohol that balances self-regulation and co-regulation, education and empowerment to facilitate personal responsibility, and government legislation.

The WFA would advocate a new approach in developing the Global Strategy to Reduce the Harmful Use of Alcohol. The standard calls for increased taxation, increased government regulation and restrictions on supply fail to take into consideration the complex nature of those consumers who do consume alcohol to excess and the drivers behind their decisions.

Interventions that target harmful consumption of alcohol, as opposed to all consumption, can be effective if conducted through long-term, funded programs on a partnership basis between government, economic operators, non-government organisations and other stakeholders.

The WFA has taken a leadership role in promoting health and social responsibility initiatives addressing alcohol consumption. When consumed in moderation, in a manner consistent with the Australian Alcohol Guidelines – Health Risks and Benefits (October 2001), wine is part of a healthy lifestyle.

At the same time, WFA recognises that wine is not always consumed in moderation. The wine sector has a responsibility to produce, promote and sell wine in a manner that is sustainable and responsible.

The Australian wine sector is committed to continue working with the Australian Government and the wider community to ensure the benefits of moderate wine consumption are maximised and excessive consumption and associated harms are minimised in every possible way.

From the Australian perspective, it is essential that consideration be given of the impact of any proposed strategies on wine businesses and the associated employment and economic contribution to regional economies. In the context of the global strategy, recommended policy and program responses must take account of the unique characteristics of member states, existing government efforts, and potential impacts on all stakeholders in seeking to deliver improved health outcomes.

The WFA looks forward to ongoing participation in the consultation process in the development of the global strategy, and ultimately to continuing to contribute to reducing irresponsible consumption of wine in Australia.

Full text: Nr. 235

World Spirits Alliance

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Summary:

The World Spirits Alliance (WSA) is an umbrella organisation for the spirits industry around the world. Members include the industry's leading trade associations in each region, such as The European Spirits Organisation, the Distilled Spirits Council of the United States (DISCUS), the Scotch Whisky Association, Distilled Spirits Councils of Australia and of New Zealand, plus similar bodies in South Africa, Mexico and Brazil, and leading spirits companies from around the world. Our members have longstanding experience participating in and implementing programmes to tackle the harmful use of alcohol, and the development of strategies that lie behind these.

The reasons for alcohol misuse are complex, yet solutions are often simplistic, based around increased regulation. Yet, misuse is still a significant problem in countries that apply the greatest restriction on the availability of and levy among the highest tax rates on alcohol.

New solutions need to be found therefore. These must be multi-faceted and culturally sensitive. They should not be so wide as to try and reach the entire population, and thus deliver a message that is not credible for the majority that drink responsibly, but rather must be relevant to properly identified at risk target groups.

Strategies that foster and generate partnerships offer considerable scope for changing attitudes, reducing the acceptability of inappropriate drinking and preventing and reducing harmful use of alcohol. Partnerships can allow development of a broad consensus and establish agreement for a unified programme. Properly embraced, partnerships with a broad range of stakeholders can reach a wide audience with consistency of focus.

There is a need for appropriate legislation, one that is proportionate and does not encourage development of illicit production and sales which would undermine efforts to reduce harmful use of alcohol.

No one size fits all solution for tackling misuse of alcohol exists. There are wide cultural differences across, and even within, regions. WHO member states must retain flexibility to adopt strategies that focus on misuse within the culture of their country while avoiding unintended negative consequences. This would permit countries to develop strategies to meet their own cultural circumstances and their own health priorities.

The WSA allows industry members to learn the lessons and successes of a range of initiatives. In Europe many WSA members are active contributors to the European Commission's Alcohol and Health Forum, in addition to being active at national level. In the USA, partnership with medical bodies has assisted doctors and other professional deal with patients' alcohol issues through development of a comprehensive tool kit. In many countries a Code of Responsible Marketing has delivered effective self-regulation.

The WSA has gone further than merely being an exchange of good practice and in 2005 published Five Basic Principles of Social Responsibility.

WSA members are committed to working through effective partnerships with WHO member state governments and to develop and implement programmes to prevent and reduce alcohol misuse.

Full text: Nr. 289

Worldwide Brewing Alliance

Alcohol Industry, trade and agriculture

Country: United Kingdom of Great Britain and Northern Ireland

Web site: The WBA does not have a logo or a website

Summary:

The Worldwide Brewing Alliance (WBA) is an informal alliance of brewing trade associations which represent brewers of all sizes from around the world (approximately 88% of the global beer production).

The WBA is opposed to the irresponsible consumption of its members' products. It is a fully committed partner in searching for appropriate, targeted and balanced solutions.

The view of its members is that to be effective strategies to reduce alcohol-related harm need to:-

- Take into account all the evidence;
- Focus on encouraging responsible behaviour;
- Target the individuals who consume alcohol beverages irresponsibly instead of compromising the pleasure and possible health benefits enjoyed by the millions of consumers who drink responsibly;
- Place consumer education at the heart of the equation;
- Be designed and conducted over many years;
- Involve all stakeholders.

Specific examples of interventions that, when tailored to meet local needs, have been successful include:-

- Enforcement of existing minimum purchasing age and drink driving laws / raising public awareness;
- Education / parental guidance;
- Screening / brief interventions;
- Social norming;
- Responsible retailing including server training;
- Targeted drinking and driving reduction schemes such as alcohol interlocks for recidivists.

It is important to remember that:-

- Most adults who drink do so moderately;

- There is no compelling evidence that measures designed to reduce per capita consumption are effective in reducing problems. Such measures would interfere unnecessarily with people's legitimate right to drink;
- Measures that force the reduction in overall consumption risk reducing the consumption of many light consumers below the level at which benefits may occur;
- There is a diversity of societies, cultures and traditions around the world and initiatives to deal with a problem in one country will not necessarily work elsewhere.

The brewing sector worldwide:-

- Is opposed to the irresponsible consumption of its products and actively works to help ensure they are consumed responsibly;
- Is committed to searching for appropriate, targeted and balanced solutions;
- Has a long history of working in partnership at regional and national level with governments, organisations and communities to help develop effective measures to combat alcohol misuse;
- Is not aware of any global move towards increased alcohol content of beer.

The WBA is committed to build on its many partnerships, disseminate good practice and stimulate and inspire its members to commit to effective long term initiatives. Numerous examples of their commitments can be found in the first and second editions of the Worldwide Brewing Alliance publications "Global Social Responsibility Initiatives" and "Drinking and Driving Reports".

The WBA can contribute to the reduction of alcohol-related harm in a number of unique ways including the following:-

- Collating and circulating information about brewers initiatives worldwide;
- Organising regular sessions to exchange and share best practice;
- Encouraging and assisting brewing organisations to initiate new initiatives; and
- Encouraging responsible behaviour.

It could also, for example, investigate further the average strength of beer in order to provide more detailed information.

Full text: Nr. 267

Full text contributions

11	Federación Española de Bebidas Espirituosas	180	National Beer Wholesalers Association
51	Polish Spirits Industry	182	Bodegas de Argentina, A.C.
63	The Brewers of Europe	183	Vinos de Chile A.G.
64	Diageo	185	Unión de Cervecerías Peruanas Backus y Johnston S.A.A.
67	Association des Industries des Cidres et Vins de Fruit de l'U.E.	186	APCV - Portuguese Brewers Association
75	Brewers of Romania Association	191	Miller Brands UK Ltd
78	Dreher Breweries	228	Wine and Spirit Trade Association
82	Kompania Piwowarska SA	235	Winemakers' Federation of Australia
83	The Federation of the Finnish Brewing and Soft Drinks Industries	237	Pivovary Topvar, a.s.
85	UNIZO FOOD RETAIL	240	Danish Brewers' Association
86	Confédération Européenne des Vignerons Indépendants	241	Danish Brewers' Association
93	Wine Institute, Trade Association of California Wineries	242	Danish Brewers' Association
96	Brewers Association of Australia and New Zealand Inc,	252	Korea Alcohol & Liquor Industry Association
108	Plzenský Prazdroj, a.s.	256	Cerveceros Latinoamericanos
110	Copa-Cogeca	257	Cerveceros Latinoamericanos
111	Verband der Brauereien Österreichs - Austrian Brewers Association	258	Stichting Verantwoord Alcoholgebruik STIVA
112	The British Beer & Pub Association	259	Comision para la Industria de Vinos y Licores (CIVyL) de Mexico
115	FED. Ho.Re.Ca Vlaanderen	262	Anheuser-Busch Companies
122	Union of the Brewing Industry Employers in Poland – Polish Breweries	267	Worldwide Brewing Alliance
126	European Forum for Responsible Drinking (EFRD)	273	Industrias La Constancia
139	Brewers Association of Japan	277	Beam Global Spirits & Wine
141	SABMiller India	278	Vin et Société
144	The European Spirits Organisation - CEPS	281	Heineken International BV
148	Associazione degli Industriali della Birra e del Malto - Italian Brewers and Malsters Association	282	Forum der Deutschen Weinwirtschaft
151	The Scotch Whisky Association	284	FORUM PSR
157	Deutscher Brauer-Bund e.V. (German Brewers Association)	285	Cervecería Nacional S.A.
164	German Advertising Council	288	SABMiller plc
166	Belgian Brewers	289	World Spirits Alliance
174	Pernod Ricard S.A.	291	BAVARIA S.A.
		294	InBev
		295	Cámara Nacional de la Industria de la Cerveza y de la Malta (México)
		298	MillerCoors
		302	Beer Institute
		305	Brewers Association of Canada
		314	Bacardi Limited
		319	Distilled Spirits Council of the United States

Cuestión 3: describen los programas con sus resultados en inglés para facilitar su comprensión

Programa I: www.consumo-responsable.com (Responsible Drinking)

To promote responsible consumption of alcohol and to provide consumers with the information they need to make informed choices about consumption.

Timing: 1 January 2008, ongoing.

Organisation & Partners: FEBE

Website with four sections:

1. To know - section where the consumer can find out information like what an alcoholic beverage is, different types of alcoholic beverage and their history.
2. To understand - section with information on the effects of alcohol on the body, recommended maximal consumption for men and women, when not to drink at all and consequences of alcohol abuse.
3. To share - section with information on different myths about alcohol that could lead to harmful alcohol consumption, "my diary" section where the consumer can keep a note of the number of units they consume and a test developed by WHO to be taken by those wishing to check their consumption.
4. To find out more - section with a standard drinks calculator.

The website address is included on all FEBE communications and the banner is on all associate websites."

The website received 2,000 visits until July 2008. 4,000 visitors are expected by the end of the year.

Programa II: Tú Sirves, Tú Decides (You Serve, You Decide)

To promote responsible serving and selling of alcoholic beverages in the trade.

Timing: 2005, ongoing.

Organisation & Partners:

- FEBE
- FEHR (Spanish Horeca Association)
- FAYSIDE (Spanish Federation of Party Premises, Dance and Discos)
- FECALON (Catalonian Federation of Night Leisure Associations)
- FADISCAT (Catalonian Federation of Party Premises and Discos)
- ECO (Madrid Association of Businessmen in favour of Leisure Quality)
- Regional Governments of Malaga, Catalonia, Andalucia and Barcelona "Three hour training module for serving staff including:

Description: General information about alcohol, alcohol and the law, rules governing advertising and promotion. Materials to support responsible serving and selling. Role-playing exercises.

Impact: Premises where training has taken place is identified with a sticker on the door certifying it as a "Responsible Business".

- The premises are also cited on the website of the local municipality.
- To maintain this status, the premises must not be reported as violating any law regarding sale to minors, public health or disorder.
- In 2008, 500 leaflets and 300 responsible serving books were distributed.
- Until May 2008, 276 people took part.
- Since 2005, more than 1,000 people have taken part from more than 100 premises and 9 hospitality schools.

Evaluation: The training was evaluated by participants via pre and post test: results showed they benefited from the training as they were able to improve the environment in their premises. The more experienced staff were the more they felt the training was useful.

Programa III: "Los Noc-turnos" (The Night-time)

- To raise awareness of the dangers of drink-driving among young people.
- To implement the designated driver concept as normal behaviour.

Timing: 2001, ongoing.

Organisation & Partners:

- # FEBE
- # Servei Catala Transit (Regional Road Safety Administration in Catalonia)
- # Instituto Andaluz de Juventud (Regional Youth Institute in Andalusia)
- # MAPFRE (Motoring Association)
- # The Transport Administration in Madrid
- # Coca-Cola
- # The European Commission"

Description: Mass media advertisements (radio, newspapers, internet and microsite: www.noc-turnos.es) to increase the knowledge of the designated driver figure among young people.

- Experts sent to convince people to become a designated driver at places of consumption. They then receive passport as a proof of their commitment to be controlled during the evening.
- Rewards for those who have a negative breathalyser test (free soft drinks, t-shirts, vouchers for petrol).
- Every designated driver is asked to fill in a questionnaire before leaving.

In 2007:

- 12 events were held.
- 832 people were designated driver.
- 17,363 people reached through 102 radio spots.
- 7,322,809 people reached through 21 ads in free newspapers.
- 59,124 visits to the microsite, with a total of 6,200,000 reached through online ad campaign.
- 32,890 visitors to the microsite." "Results of the 2007 questionnaire on point of consumption (1,030 participants, 46% women and 54% men) showed:
 - 74% of participants were aged between 16 and 24 years old. 26 % were over 25 years old.
 - 72% of the sample always uses the car when they go out at night on weekends.
 - 82% to 85% of the drivers never drink-drive. This percentage is higher in the target group aged between 16 to 25 years old in which the behaviour is starting to be a habit.
 - Those who had seen the campaign were more aware of the dangers of drink-driving.
 - 63% of the sample did not go home in a car if the driver had drunk, but rather use alternative transport. This shows responsible behaviour not only with the drivers also their group of friends.
 - 41% of the sample thought that the role of designated driver could easily become habitual behaviour for them.
 - 76% of the sample who participated in our campaign says that they will adopt the figure in the future.

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

To identify the most effective measures/strategies to address alcohol-related harm it is important to:

- Take into account both the health problems associated with alcohol misuse and the health and social benefits of moderate consumption;
- Recognize that drinking patterns, as opposed to total consumption, are the best indicator of the extent of alcohol related harm;
- Examine the reasons behind people's different drinking patterns and as such how they might be influenced.
- Involve all relevant stakeholders working together, rather than against each other; the recently established EU alcohol and health Forum is a good example of this.

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

Measures to reduce the health problems related to alcohol consumption will be effective if:

- They recognize that the problem which needs to be addressed is alcohol misuse as opposed to total alcohol consumption;
- They understand and target the right problem in the right context recognizing that the extent and nature of the problem differs significantly from one country to the next;
- They are based on the evidence and designed for the long term;

They recognize the role of all stakeholders in addressing the problem

The most common forms of dangerous and harmful drinking behavior are:

- Drinking and driving
- Underage drinking
- Binge drinking
- Irresponsible drinking during pregnancy
- Addiction
- Drinking in circumstances one should not (dangerous professions etc)
- Illicit alcohol

The targeted measures which most effectively address these drinking behaviors include:

- Effective enforcement of drink driving and purchasing age legislation
- Education and awareness campaigns for young people and parents
- Interventions from the medical profession
- Measures to encourage responsible serving
- Measures aimed at encouraging responsible consumption
- Enforcement measures to reduce illicit alcohol production and consumption

Measures which target total alcohol consumption (high taxation, limited distribution, warning labels) as opposed to the risky drinking behaviours outlined above will have a limited impact on alcohol misuse but rather penalize the vast majority of consumers who drink responsibly.

It must also be clearly recognised that many of the problems associated with alcohol misuse in a number of (particularly developing) countries stem from illicit alcohol production. The issue of illicit alcohol needs to be urgently addressed in these countries.

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

In the face of the problem of excessive alcohol consumption in society the Polish Spirits Industry sees it is very important to actively encourage responsible attitudes to the issues of alcohol sales and consumption, which in consequence means educating people on the effects of its consumption and warning them against situations when drinking even small amounts could put human health and life at risk - especially so for pregnant women, youth and drivers. Promoting the concept of responsible consumption of spirit drinks and responsible marketing practices is one of the spirits industry's main aims.

Polish Spirits Industry as a member of CEPS (European Spirits Organization) approved the CEPS Charter on responsible alcohol consumption and development of its own Code of Marketing Conduct signed by all PPS members in December 2006.

The purpose of this Voluntary Code of Marketing Conduct is to require alcohol producers and distributors to promote responsible consumption of alcohol, in a manner conforming to the highest standards accepted by all parties of this Code, additionally for marketing and communication activity not to encourage excessive consumption or abuse of alcohol, nor refer to this type of activity with approval or indulgently.

Additionally as a member of CEPS PPS undertakes to uphold a number of commitments presented in the Charter, including:

- By 2010, 75% of all CEPS members advertising will carry responsible drinking messages
- CEPS members will fully comply with the EFRD's Common Standards on Commercial Communications
- More and better Retail Server Training Schemes and Drink Driving Campaigns
- The industry will work closely with stakeholders to help define what is meant by sensible drinking and communicate this information widely.

THE BREWERS OF EUROPE'S CONTRIBUTION
TO THE WHO'S OCTOBER 2008 WEB CONSULTATION ON THE DEVELOPMENT OF
A DRAFT GLOBAL STRATEGY TO REDUCE HARMFUL USE OF ALCOHOL

The Brewers of Europe is the voice of the European beer sector and represents, through its national brewing association members, approximately 95% of the EU's beer production, made by around 3000 breweries. Europe's breweries also generate, directly and indirectly, around 2.6 million jobs (equivalent to the total employment of Denmark, Slovakia or Finland) and €39 billion in taxes for governments each year.

Furthermore, the product Europe's brewers produce, beer, is a refreshing enjoyable beverage with relatively low alcoholic strength which brings pleasure and social interaction to many people. The vast majority of European consumers drink responsibly and it is reassuring for those who do consume beer regularly to know that it can be part of an adult's healthy lifestyle, with the WHO also recognising the health benefits associated with responsible, moderate consumption. Europe's brewers are committed to promoting responsible beer consumption and to being part of the solution with regard to tackling the alcohol misuse of the small percentage of EU citizens who drink excessively or inappropriately.

Karl Mann noted in 2003 that, in research into alcohol, "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 has led to a dependence on measures that attempt to reduce overall consumption. In Nordic countries such measures have neither prevented strong (recorded and unrecorded) consumption growth nor reduced problems. Meanwhile the factors leading to the reductions in overall consumption in France, Italy, Spain and Portugal, which cannot be explained by the introduction of control measures, have not been well examined.

What are your views on effective strategies to reduce alcohol-related harm?

In The Brewers of Europe's opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers are buying a drink, not just alcohol, and selecting their beverage (e.g. beer brand x) on the basis of numerous factors (including taste, occasion, culture, tradition, weather etc.), not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions may include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Health-sector preventive measures against hazardous and harmful alcohol consumption, such as screening and brief interventions;
- Educational tools for young people and families;
- Enforcement of existing national drink-driving legislation and tough sanctions that deter;
- Enforcement of legal purchasing and drinking age legislation;
- Drink driving reduction strategies, particularly for higher risk groups, such as repeat offenders and young drivers;
- Encouraging responsible serving in outlets.

On the other hand, The Brewers of Europe believes that measures aiming to reduce overall consumption:

- Have little effect on misusers;
- Compromise the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, The Brewers of Europe believes therefore that the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy;
- The WHO's six-point agenda for responding to challenges, wherein the third agenda point - strengthening health systems - can be acted upon through encouraging screening and brief interventions in the health-sector.

Building on these fundamental principles on the most appropriate ways to tackle alcohol-related harm, across Europe the brewing sector has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

An interesting initiative in respect of involving all relevant stakeholders is the EU Alcohol and Health Forum, launched at the initiative of the European Commission, which is based on a positive, action-oriented, multi-sectorial, multi-stakeholder approach to addressing the problems associated with inappropriate alcohol consumption. The Forum aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm. That the European Commission and the EU Member States promote the multi-stakeholder approach as a way forward in addressing alcohol-related harm is an extremely promising, though challenging, gesture. By definition, all those stakeholders having signed the Forum's Charter endorse this approach. We trust that such an approach as the Alcohol and Health forum may be considered as a template for similar platforms at all different levels.

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

Our Members have the issue of tackling alcohol misuse on the top of their agenda, a situation reflected in the fact that The Brewers of Europe, its member associations and companies are by far the number one committers to the EU's Alcohol and Health Forum, with over a third of commitments filed by October 2008 coming from the brewing sector - 25 from The Brewers of Europe (and its national associations) and 11 from brewing companies.

These commitments are aimed at addressing alcohol misuse-related issues as diverse as:-

- De-normalising the binge drinking phenomenon in Finland;
- Seeing to it that doctors and pregnant women in Italy are better equipped with the Italian Association of Obstetricians and Gynecologists' information and guidance in relation to alcohol and pregnancy;
- Discouraging minors in Romania from starting to drink;
- Taking steps to promote legal purchasing ages being understood and followed in Belgium, Germany and Poland;
- Discouraging drink-driving in Denmark, Poland and Spain;
- Promoting responsible consumption, particularly amongst young adults, in Denmark, the Netherlands and Spain;
- Establishing working mechanisms to see to it that, across the EU, commercial communications do not encourage inappropriate drinking behaviours, and that the self-regulatory mechanisms are put in place for consumers to complain if they feel the local advertising codes are being broken.

An important feature of these commitments is the number and diversity of partnerships with other stakeholders who also wish to support, finance and associate themselves with these commitments. Examples of partners are:

- National governments;
- Local and regional authorities;
- Road safety authorities;
- Driving schools;
- Police Authorities;
- Other civil society individuals (lawyers, teachers, attorneys, professors, academics etc.);
- Young people's groups (18-30);
- Health and medical associations;
- Consumer Groups;
- Self-regulatory organisations;
- Other NGOs;
- Other alcoholic drinks producers;
- Horeca, Retailers and Distributors;
- Media Broadcasters;
- Advertising Agencies;
- Other industries.

These just represent the initiatives that have been submitted as commitments to the Forum and there are a number of other best practice initiatives that are, or have been, taking place, with the support of Europe's brewers, but not within the context of the Alcohol and Health Forum.

If the EU's strategy to support Member States in reducing alcohol-related harm and the Alcohol and Health Forum remain focused on nurturing best practice initiatives that, on the local level, target alcohol misuse where it occurs, then The Brewers of Europe and its members remain committed to developing and further improving these campaigns.

In an effort to identify what is best practice, The Brewers of Europe has also committed to seeing to it that the implementation of these commitments is monitored and evaluated. In this way best practice can gain support from an even wider groups of stakeholders, including governments, and be transferred and adapted to tackle similar alcohol misuse-related problems in other countries and regions.

In relation to how The Brewers of Europe itself can contribute to the reduction of alcohol-related harm, concrete examples of the leading role we play in this matter, particularly in facilitating the sharing of best practice and experiences and stimulating new initiatives, include:-

- Submitting 25 commitments from our members under the EU Alcohol and Health Forum (2007, 2008);
- Producing detailed recommended operational standards for increasing the effectiveness of self-regulatory systems (2007, 2008);
- Signing and committing to the EU Alcohol and Health Forum's Charter (2007 and ongoing);
- Contributing to the Worldwide Brewing Alliance's (WBA) Drinking and Driving Reports (2004, 2006, 2008);
- Signing and committing to the European Road Safety Charter (2004 and ongoing);
- Organising Self-regulation workshops (2003, 2004, 2007, 2008);
- Developing and adopting Guidelines and an internal Manual for Responsible Commercial Communications (2003, 2004);
- Contributing 300 of the initiatives identified in the WBA's "Global social responsibility initiatives" publication (2003, 2006);
- Founding the European Research Advisory Board, an independent alcohol research foundation, established to fund biomedical and psychosocial research into beer and other alcoholic drinks (2003 and ongoing);
- Collating campaigns for a publication on European brewers' initiatives to combat misuse (2002).

Some of The Brewers of Europe's pro-active inputs into the dialogue so far with government and stakeholders have included:-

- The Weinberg Group's "Independent review of issues related to alcohol consumption in Europe" (2006);
- Ernst & Young's report on "The contribution made by beer to the European economy" (2006);
- Two major submissions in the context of the EU's development of a strategy to support Member States in reducing alcohol-related harm (2004, 2005);
- Canadean's two reports on Responsible Marketing (2002, 2005);
- The European Working for Responsible Consumption Conference (2002);
- Beer & Health Symposia (1999, 2001, 2003, 2006, 2008).

SUBMISSION BY DIAGEO TO WHO ON WAYS TO REDUCE HARMFUL DRINKING

Alcohol is a special product - enjoyed responsibly by most, misused by a minority. Diageo is aware of the positive, and sometimes negative role alcohol can play in the lives of individuals and in society. In aspiring to change consumer attitudes and behaviour, we recognize that we cannot achieve behavioural or cultural change by ourselves, and we will continue to find opportunities to work in partnership with others to bring about change.

We understand our responsibility to produce, market and sell our brands responsibly. We also believe that there is a shared responsibility with individuals, families, governments, law enforcers and educators to address alcohol misuse with respect to diverse cultures around the world.

Diageo has experience of understanding and communicating with consumers which we use to make our Responsible Drinking campaigns relevant to at-risk groups. We work in a range of ways with many different stakeholders running over 110 programmes in over 45 markets to raise awareness, promote responsible drinking and combat misuse such as drink driving, excessive drinking, underage drinking and irresponsible serving of alcohol.

We believe we have particular experience and expertise to share in the following three areas, above and beyond the significant level of activity industry is already involved with, to contribute to reducing the harmful use of alcohol.

MARKETING RESPONSIBLY

Codes

Diageo is committed to internal self-regulation, as enshrined in our Diageo Marketing Code (DMC).

Briefly, the DMC requires that our marketing (including advertising, promotions, sponsorships, innovation, PR, digital etc.) does not:

- target or primarily appeal to those under the Legal purchase age for alcohol (LPA)- or 18, whichever is higher - in content or placement;
- depict or condone excessive or irresponsible consumption;
- present abstinence negatively;
- cause offence or suggest association with violent, anti-social or illegal activities;
- place undue emphasis on high alcohol content;
- imply that alcohol may be medicinal or a health product;
- depict activities or locations where drinking would be unsafe or unwise, such as driving or operating machinery; or
- suggest that alcohol enhances sexual attractiveness or is necessary for social or sexual success.

The DMC sets global minimum standards, and applies in addition to regulations and industry codes. Our in-market companies may strengthen the DMC to address specific local issues, but may never weaken it.

We are committed to applying the same internal self-regulatory rigour to new media. Digital marketing is evolving in a dynamic and rapidly changing multi-channel environment, and we significantly enhanced our Diageo Digital Code (DDC) last year to reflect it. The DDC governs three key considerations across all digital channels - content (DMC compliant), placement and

permission marketing, with particular emphasis on limiting access and appeal only to those over LPA.

Compliance

A code is only as effective as its compliance and enforcement, and our compliance processes and controls are as fundamentally important to the DMC and DDC as their content.

Compliance is mandatory, and is a fundamental responsibility and accountability of the general manager and marketing director in all our in-market companies and global brand teams.

Advertising agencies, market research companies, media buyers etc. receive a copy of the codels as part of our brief and must contractually undertake to abide by them in work they do on our behalf.

Training in the codels is provided for new staff as part of their induction, and refresher training held for all staff - and often agencies - every 1-2 years. Online e-learning courses in both codes are available to Diageo employees and agency partners (DMC in French, English and Spanish). Over 50 digital 'super-users' from within the global marketing community received in-depth training on the DDC and are responsible for training their teams and agencies.

Sign-off is required for all marketing activities before they are launched, *and* in each market in which they are launched. In-market companies and brand teams establish processes to ensure compliance with the letter and spirit of the codels. The best-practice compliance process, encouraged across the business to ensure objectivity and diversity of perspectives, and comprehensive, regular review free from cost or time pressures, involves senior managers and/or DMC 'champions' from three functions (marketing, corporate relations, legal) reviewing and signing-off all major marketing material at three stages of development (brief / concepts, pre-production, and final).

Controls

Diageo developed an online approval tool for all marketing initiatives, to facilitate their sign-off and compliance. Smart Approve was piloted in 2005, and an enhanced version has been rolled out across the business since 2007. To date it has been rolled out to **29** key markets, including GB, North America, Russia, India, Latin America, and South Africa, and will be fully implemented by July 2009.

Since inception, over **5,600** marketing projects have been reviewed through Smart Approve.

Smart Approve enables:

- review by all required approvers;
- full central visibility of all approvers' comments;
- full tracking and visibility of project status, required amendments and approvals; and
- complete audit trail through full archiving of all comments and approvals.

Each year, every in-market company completes a self-assessment of processes and compliance against the DMC & DDC, and audits are carried out on selected in-market companies and global brand teams. Additionally, all senior managers complete a compliance certificate signifying their adherence to the codels.

There is a designated role of Global Manager for Responsible Marketing and Innovation who oversees global governance of the DMC. A Digital Governance Leadership Team, comprising senior representatives from marketing, legal, corporate relations and IS, chaired by a Digital Governance Manager, oversees the development, governance and ongoing compliance with the DDC.

MARKETING RESPONSIBILITY

Research carried out by Diageo Great Britain suggested that young adult consumers are keen to build positive social relationships, and to be seen as a 'social asset'. Irresponsible drinking can put important social relationships at risk, and turn the drinker into a 'social liability'. This research led to the development of two Diageo-branded broadcast advertising campaigns in 2006, focusing on these two themes. Subsequent research showed:

- "57% of consumers said they would reconsider how they drink as a result of the campaign
- *75% said that it was the kind of advertisement that makes you think
- "89% felt that the situations depicted were credible
- *92% said that it was good to see alcohol companies advertising a responsible drinking message.

In 2007, Diageo built on the consumer research generated to develop and launch 'The choice is yours' campaign. This time the campaign included press and digital messaging as well as television.

The campaign centers on the recognition that people have to make choices about their drinking. Over the early part of the evening, drinking is linked to being a positive social asset; drinking excessively becomes linked to being a negative social asset. There were two versions of the campaign, one targeted at young men and one targeted at young women.

Subsequent research showed that:

- *The campaign was highly visible - 63% of those asked recognised it
- *80% understood the main message
- "92% saw the behaviour of the characters as realistic
- *92% said it made them think
- *89% said it made them aware of the choices they have when drinking
- "95% said it was good to see alcohol companies advertising a responsible drinking message
- *62% said they were more likely to consider drinking responsibly as a result.

In November 2007, Diageo Iberia launched a campaign called 'A night to remember or a night to forget'. To be run during the festive season, the campaign's aims were to show the negative impact of excess drinking.

The initiative was a result of consumer research in Spain about how people behaved when they were on a night out. Over the festive season there is traditionally an increase in the number of social gatherings and people often drink too heavily on these occasions leading to high-risk behaviour that can have serious consequences. Through this campaign Diageo was asking young adult consumers, and adults in general, to control how much they drink and avoid situations that could ruin the night out for themselves and for others. There were two versions of the campaign, one targeted at young men and one at young women.

The campaign ran in all media channels including television, and included on trade activity reaching approximately 750,000 people.

Measurement and evaluation was conducted in Madrid in January 2008 with 18-35 year males and females on the television executions and specific research was carried out for the on trade activities.

Respondents told us that the television commercials were engaging, involving, distinctive and interesting:

*Over 70% understood this to be a responsible drinking campaign

*50% claim they are more likely to drink responsibly having seen it (and 41% of other half are drinking responsibly already)

'85% agree that it is good for alcohol companies to advertise a responsible drinking activity

"The on trade research results told us that 20% of respondents will change their attitude in the future and 22% moderated consumption during that night.

Our South African joint venture, brandhouse focused on drinking and driving and researched which consumers were drinking and why. The research highlighted that many people knew about the dangers of drinking and driving but they did not think they would either get caught or have an accident - they did not think 'it would happen to them'.

To reach the target market identified (18-40 year old socially active men), brandhouse is running an integrated campaign - a series of radio and television commercials, billboard advertising, print advertising and a website. The concept is to convince consumers that they could be involved in a serious drinking and driving incident. Through a first-person perspective a seemingly ordinary social event for an ordinary man ends in devastating consequences as a result of drinking and driving with the tagline 'It won't happen to me' - connecting with the original consumer behaviour and research.

Initial focus groups indicated a positive response to the proposed campaign. At the time of writing full measurement and evaluation is awaited.

AMBASSADORS FOR RESPONSIBILITY

DRINKiQ.com is a global resource that helps combat alcohol misuse and promote responsible drinking through the sharing of best practice tools, information and initiatives. Its premise is different to that of other responsible drinking websites in that it is intended to bring together all the credible resources that currently exist into 'community' sites with one global overview. There are currently three sites, global, US and Great Britain. Within 12 months we will have 26 sites and around half of these in native languages including Latin American Spanish, Russian, Greek, Thai, Japanese, Korean, Polish, Portuguese, Chinese and Danish.

What differentiates DRINKiQ.com?

DRINKiQ.com is a unique compilation of materials from a range of sources, including government, the private sector and civil society

It contains nutritional, allergen and alcohol content information about our products

It includes expert information about alcohol

There are opportunities for people to contribute content and provide feedback

- It uses a variety of media to engage website visitors with responsible drinking

DRINKiQ employee engagement programme is an interactive session on the enjoyment of alcohol.

Started in Australia in 2002 by employees for employees, it has developed into an ambassadorial programme and is being implemented across Diageo to all 23,000 employees.

DRINKiQ sessions use a combination of discussion, information and some practical tips on how to make responsible choices about drinking - or not drinking.

Measurement and evaluation results for six months April - September 2008:

- * 84% of people felt better equipped to have conversations with friends and family about responsible drinking
 - * 75% said it is the kind of workshop that makes them think about the way they drink
 - * 68% said they were much more or a little more likely to consider drinking differently (and of the remaining 32%, 87% feel they already drink responsibly)
- We have engaged a small number of external partners in our DRINKiQ conversation with positive feedback in terms of how it makes people think about their own personal choices and the choices others make to drink or not drink. These external partners include government, licensing authorities, hospitality organisations and sports partners.

The DRINKiQ programme has been endorsed by the Australian Medical Association.

CONCLUSION

in these three areas:

- Marketing responsibly, and particularly our focus on compliance and controls;
- Marketing responsibility, and using our marketing tools and consumer insights to craft relevant responsible drinking messages; and
- Equipping all our stakeholders, including our employees and partners, to promote and be ambassadors for responsible drinking via DRINKiQ and DRINKiQ.com

Diageo believes we have particular experience and expertise to share to contribute to reducing the harmful use of alcohol.

WHO CONSULTATIONS AND GLOBAL STRATEGY:

WHA Resolution 61.4 on Strategies to Reduce the Harmful Use of Alcohol, approved in May 2008, can be the basis for a constructive and inclusive global strategy process led by the WHO Secretariat and approved by Member States.

Harmful alcohol abuse occurs in complex and diverse environments. Effective and sustainable approaches require tailored, multi-disciplinary, multi-stakeholder, policies and programmes with roles and responsibilities for all, including the private sector, domestically and internationally.

Responsible regulation, such as addressing drink driving, is needed as part of balanced policies. The use of excessive regulation will prove to be counter-productive.

To help guide effective policies, the Strategy needs to reflect the following key realities:

- ✚ Over half the alcohol consumed around the world is illicitly acquired or from informal, local and uncontrolled sources;
- ✚ Commercial, legal alcoholic drinks support jobs and income in important economic sectors such as tourism, hospitality and rural/agrarian economies, and generates le for public health initiatives;
- ✚ The behaviour of consumers/groups engaged in harmful alcohol consumption is a function of complex circumstances: patterns/impacts need to be understood in context so that effective measures can be developed and implemented (e.g. there is robust evidence which clearly demonstrates that pricing does not have a significant effect on harmful use by drinkers).
- ✚ Excessive regulation, whilst a seemingly attractive and simple solution, can have unintended negative consequences such as driving consumers to consuming more illicit/informal products and the accompanying increase in criminality activity in the supply of products (e.g. smuggling/trafficking) and the social impact that arises from this. In addition, excessive regulation imposes unnecessary costs on responsible consumers and legitimate economic operations and those involved in it – and all the while failing to tackle the problem of misuse.
- ✚ Interventions which target harmful use e.g. drink driving, server training to combat intoxication etc, can be effective if well designed and implemented.

The alcoholic drinks industry has a creditable and long-standing track record of working to reduce the harmful misuse of alcohol. The industry is keen to continue engaging with WHO Geneva and WHO Regional Offices, Member States and others on effective and evidence based approaches and policies.

Industry sees and is prepared to cooperate actively on important new opportunities to do more to address harmful use, with the global health community and others.

Industry has information, expertise and experience in the area of markets and marketing, on drink-driving, how to prevent excessive consumption in the age group 18 to 25 years, as well as on effective public awareness programmes, which the industry considers to be positively helpful.

WHO has recognised that the Global Strategy must reflect national, regional and cultural contexts – differing public health needs, priorities, capacities and resources – and the potential unintended consequences of various policies, in order to promote effective efforts by regions and members.

The industry would caution against proposals for one-size-fits-all Global Strategy which prescribes, for example, higher taxes and prices and restrictions on the marketing, trade and/or availability of alcoholic drinks without stressing practical issues, considerations of effectiveness and alternatives, and cultural, regional and national contexts.

The WHO Global Strategy process should begin to identify potential specific, cost effective and pragmatic undertakings for all stakeholders.



FULL CONTRIBUTION (max. 2000 words)

In providing your contribution you may wish to focus on the following issues:

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

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

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

(1015 words)

The "Brewers of Romania" Association is the voice of the Romanian beer sector and represents, through its members, over 80 % of the Romanian beer industry. The number of employees, working directly in the 11 breweries of our members, is over 4,400 people. The members of the "Brewers of Romania" Association have made investments of over 766 billion Euros in Romania, from 2004 to 2007. Only in 2007, the taxes paid by the members to the Romanian state have reached 264 billion Euros.

The "Brewers of Romania" Association is also committed to promoting moderate beer consumption and to being part of the solution with regard to tackling alcohol misuse.

What are your views on effective strategies to reduce alcohol-related harm?

In the "Brewers of Romania" Association's opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between moderate alcohol consumption, which has a number of benefits, and alcohol misuse;
- Understand and target the problems;
- Take account of the specificities of beer and the reasons behind a consumer's choice to purchase it;
- Recognize the importance of education and training;
- Encourage *responsible* behavior;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions include:-

- Interventions to reduce underage drinking;

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- Educational tools for teachers, young people, and parents;
- Enforcement of existing national drink-driving legislation;
- Drink driving reduction strategies;

On the other hand, we are trying hard to have an approach that has an effect on misuse without compromising the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, we believe therefore that the most effective approach needs to reflect:-

- Interventions that educate the consumers, showing them the benefits of a moderate and responsible consumption on the one hand, and the harmful consequences of alcohol misuse (when: drink-driving, heavy drinking, underage drinking) on the other hand
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches.

Based on these fundamental beliefs on the most appropriate ways to tackle alcohol-related harm, across Romania, the brewing sector therefore is in the process of building experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with authorities and other stakeholders.

OUR INITIATIVES IN RESPECT OF INVOLVING RELEVANT STAKEHOLDERS ARE OUR TWO SOCIAL CAMPAIGNS, WHICH ARE BASED ON A POSITIVE, ACTION-ORIENTED, MULTI-STAKEHOLDER APPROACH TO ADDRESSING THE PROBLEMS ASSOCIATED WITH INAPPROPRIATE ALCOHOL CONSUMPTION. THE TWO SOCIAL CAMPAIGNS PROMOTE THE MULTI-STAKEHOLDER APPROACH (MINISTRIES, AUTHORITIES, MEDIA, OTHER ORGANISATIONS AND CIVIL SOCIETY) AS A WAY FORWARD IN ADDRESSING ALCOHOL-RELATED HARM, PROVIDING PLATFORMS AT NATIONAL LEVEL.

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

Having a high sense of social responsibility, the members of the “Brewers of Romania” invest important amounts in projects having a deep impact on the community.

These projects are aimed at addressing alcohol misuse-related issues as:

- Discouraging minors in Romania from starting to drink;
- Discouraging drink-driving in Romania;
- Promoting moderate and responsible consumption;
- Guaranteeing that, across Romania, commercial communications do not encourage inappropriate drinking behaviors, and that the self-regulatory mechanisms are put in place for consumers to complain if they feel the local advertising codes are being broken.

An important feature of these commitments is the number and diversity of partnerships with other stakeholders who also wish to support and associate themselves with these commitments. Examples of partners are:

- Governmental Institutions;
- Local and regional authorities;
- Road safety and crime-prevention police authorities;

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- Other civil society individuals (psychologists, teachers, high school pupils etc.);
- Self-regulatory organizations;
- Media Broadcasters;
- Advertising Agencies;

In an effort to identify what is best practice, "The Brewers of Romania" Association has also committed to ensuring that the implementation of these commitments is monitored and evaluated. In this way best practice can gain support from even wider groups of stakeholders.

In relation to how The "Brewers of Romania" itself can contribute to the reduction of alcohol-related harm, concrete examples of the role we play in this matter, include:-

- Submitting 2 commitments under the EU Alcohol and Health Forum (December 2007);
- Signing and committing to the European Road Safety Charter (2008 and ongoing);
- Developing the "Commercial Code of Communication" for Responsible Commercial Communications (2007);
- Organizing social campaigns to combat misuse (2006 and ongoing).

Our campaign for the high school pupils, called "Alcohol does not make you grown up" involved partnerships with the Ministry of Education, Research and Youth and the Romanian Police.

Since March 2008, 162 000 teenagers have taken part in the counselling classes held by more than 1 500 Ambassador Professors. The lesson plans along with the two educational movies are now included in the master classes' methodology, in order to make them more attractive for teenagers.

Since December 2007 we have also offered the teenagers the opportunity to compete in two contests: the first one involved short-movie making while the second one, which is ongoing, involves conceiving and implementing a campaign. Both contests are based on the peer education concept so that the teenagers give their peers the message "Alcohol does not make you grown up".

Another 3600 parents and teachers have received during September and October 2008 the "Alcohol does not make him grown up..." education guide, written by the psychologist, Dr. Cristian Andrei. This publication helps closing the pupil-professor-parent education circle.

The first part of our don't drink and drive campaign, called "Reality changes when you drive drunk" started in February 2008, in collaboration with the Traffic Police Department and the National Audio-Visual Council and aims to draw the attention of drivers in order to convince them not to ever drink and drive.

In September 2008, we have signed the European Road Safety Charter, in order to develop the second part of our "Don't drink and drive" campaign under its umbrella.

Stance of the Dreher Breweries to the WHO

1. Harmful use of alcohol is one of those global problems that must be faced both at global as well as at national level. This is a complex problem, therefore such a strategy must be set up which offers complex solutions counting on every affected party's responsible and active participation. This strategy must be transparent, preventive counting with the diversity of real life and cultures, providing a methodological base for the realistic and professional action plans.

Heart of the strategic approach is that every aspect of the harmful use of alcohol must be revealed, including diversified reasons and perilous consequences. An efficient strategy concentrates not only on reducing the negative effects of the phenomenon but also on the prevention and on the assessment of the long-term impacts. In elaborating such a strategy, every affected party must be involved. It is especially important that producers and distributors of alcohol be constructive participants in the dialogue providing basis for the strategy. In Hungary, where alcohol consumption is outstandingly high, it is very important that every actor of the legal alcohol industry take part responsibly in preparing efficient decisions. Industry has the information and the knowledge that can help in defining a strategy taking into account the economic, tax-connected, health-related, commercial and other viewpoints. When elaborating the strategy, all stakeholders representing commerce, tourism, media, education and civil society must be considered. Representatives of the public health are decisive to receive a leading role in the process.

Only a consistent and consequent strategy can facilitate to distinguish the cultivated way of alcohol consumption from the harmful use of alcohol, and to integrate the global recommendations allowing every state member to set up realistic plans considering the specialities of their own countries. Lack of enough resources is a serious obstacle in Hungary and in numerous East-European countries; therefore it is very needed to focus on the most important questions while creating the national strategy. Gradation is of key importance if we want a realistic and successful strategy.

Reduction of the excessive use of alcohol and the underaged's alcohol consumption, restriction of the spreading of bad alcohol consumption-related responses to stress, limitation of women's exaggerated alcohol consumption can be considered underlined issues in Hungary when setting up a national alcohol strategy. Alcoholism as illness and consequences of the excessive alcohol consumption must be dealt with, as a group of criminal consequences too.

It is important to work out such a strategy that does not inspire people with harmful habits of use of alcohol to "replace" it with more dangerous matters, or to purchase alcohol products of uncontrolled quality from illicit sources due to the excessive prohibitions.

2. Cultural traditions and customs vary in every country but in most of them those economic, social, mental and generation problems can be identified quite well, which may provoke the harmful and excessive use of alcohol. The best way is if these problems can be mitigated too. It is important for the adult consumers to make proper decisions in possession of balanced and professional information.

Prevention must be regarded as the most important question, in which education, confirmation of good cultural samples, alcohol-related balanced and detailed information have a decisive role. Schools, health care institutions, young people's own organizations and institutions dealing with young people might be given an outstanding role. Such modern and creative campaigns and permanent projects are needed against the excessive consumption of alcohol, which count with the challenges of the today's world and with the conflicts resulting from stress. Attractive alternatives instead of prohibitions and restraints are important to be offered by the preventive programs to young people. In Hungary, Association of the Hungarian Breweries has been doing successful campaigns against young people's driving when they have drunk. Dreher Breweries strengthen the responsible alcohol consumption in its campaign co-operating with a world champion motorcyclist. Responsible companies don't stimulate - either with their marketing activity or with promotions – to excessive alcohol consumption, they don't state that alcohol contributes to success with its strength and they firmly call everyone's attention to the fact that both the under aged as well as pregnant mothers expose themselves to a serious danger if they drink alcohol.

3. It is well known in Hungary that the Dreher Breweries pursue its business activity as a responsible company. We always publish correct and creditable information on our products; we call our partners' attention to the dangers of the harmful use of alcohol with a responsible marketing activity. We are a member of the Hungarian Advertising Standard Association, thus we have introduced the strictest self-control in our corporate marketing and advertising activities. As a member of the Association of the Hungarian Breweries, we make our Code of Conduct public. Our sponsorship activity popularizes such examples where we encourage people not to drive at all if they have drunk alcohol. For the balanced communication, we apply "new media" devices preferred by the young; we provide adequate professional information on the alcohol-related questions for the media of public health and economy. We regard it extremely important to stimulate every stakeholder of ours to pursue the legally right behaviour, and to constrain the spreading of the illicit market. As an employee, we take care that our colleagues behave properly in line with our principles both in their workplace as well as in their private life, and they be adequately helped by the company if they have problems.

We are open to any kind of social initiative of the civil society aiming to mitigating the problems resulting from alcoholism. Primarily we urge the reduction of young people's and pregnant women's alcohol consumption, we stand up for mitigating those deviancies, which lead to the harmful use of alcohol.

Poznań, 29 October, 2008

Submission to public hearing on ways of reducing harmful use of alcohol relating to the Resolution WHA61.4 and to the document A61/13 (Strategies to reduce the harmful use of alcohol), Report by the Secretariat to the 61st World Health Assembly

1. What are your views on effective strategies to reduce alcohol-related harm?

We believe effective strategies should not be targeted at curbing the overall consumption of alcohol, but rather address certain risk areas, identified by the European Commission in its communication of 2006. In this document the Commission presented an 'EU strategy to support Member States in reducing alcohol related harm', addressing the adverse health effects related to harmful and hazardous alcohol consumption, as well as to social and economic consequences. With this objective, the Commission has identified five priority themes, which are relevant in all EU member states:

- Protecting young people, children and the unborn child;
- Reducing injuries and death from alcohol-related road accidents;
- Preventing alcohol-related harm among adults and reduce the negative impact on the workplace;
- Informing, educating and raising awareness on the impact of harmful and hazardous alcohol consumption, and on appropriate consumption patterns;
- Developing and maintaining a common evidence base at EU level.

The most effective strategies to reduce alcohol related harm should be carefully targeted, systemic and long term intervention programs as opposite to strategies reducing the overall alcohol consumption thus promoting the informal or illicit market through policies that punish the formal, regulated alcohol sector and sometimes they do not distinguish between the formal and informal market.

The most important weakness of some strategies is their ideological bias and weak evidence base thus promoting ineffective actions. Therefore we believe every effective strategy should:

- (a) be based on scientific / research data and knowledge identifying the reasons of harmful consumption, allowing to design programs, which would address real issues in an effective way. The scientific base should allow all the relevant parties to avoid in-effective and superficial actions, which would fail to address the problems identified;
- (b) be mindful of various national, cultural, local, societal contexts, resources available and particular circumstances;
- (c) incorporate various stakeholders and feedback sharing schemes, as well as transparent monitoring and auditing standards and mechanisms.

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

In our opinion harmful use of alcohol can be reduced by providing individuals in risk groups with in-depth education on risk associated with harmful consumption patterns. The potential and actual consumers should be provided with accurate and balanced information about alcohol consumption.



It is especially important that medical professionals are supported with proper guidance.

The first step towards achieving this goal is to build a robust scientific, research based knowledge, which would allow to design strategies described above.

3. In what ways can you or your organisation contribute to reduce the harmful use of alcohol?

Kompania Piwowarska together with the Association of Polish Brewers, as well as on its own, has been contributing to the reduction of the harmful use of alcohol for many years through long-term education programs supported with public communications. We believe we should not only contribute but also further develop and intensify these programs.

The overall goal of the industry and Kompania Piwowarska managed programs was to providing consumers with accurate and balanced information about alcohol consumption.

We have and intend to continue work in partnerships with various stakeholders, including local communities, government institutions representing the health sector and others (police, NGO's etc.) to enforce youth access prevention and provide shop personnel with skills to refuse the underage sales as well as knowledge of the legal and health consequence of such behaviors, to provide consumers with knowledge about consequences of driving under the influence of alcohol as well as reminding consumers of health and other societal considerations of alcohol consumption. The most important initiatives addressing these areas are (in brackets links are provided to the relevant websites):

1. 'Don't drink and drive' Program: <http://www.klubdrivera.pl/>
2. Alcohol: Minors not Allowed Program: <http://www.browary-polskie.pl/spoleczna/kampanie/szczegoly.php?gid=&eid=1&exd-markupId=4>
3. 'Check you ABV' SMS Program: www.sprawdzpromile.pl

Kompania Piwowarska can and will also contribute to reduce the harmful drinking through advocating policies that discourage the informal alcohol market as well as introducing and implementing an Employee Alcohol Policy through which we will reinforce high levels of employee conduct in relation to alcohol consumption and also provide financing and assistance for treatment for employees with alcohol-related problems.

* * *

This is the submission made on behalf of Kompania Piwowarska.

Kompania Piwowarska is the largest brewer in Poland. Hundreds of years of experience in beer brewing, state-of-the-art technology and rigorous adherence to the World Class Manufacturing principles guarantee the highest quality beer. The company's product portfolio includes TYSKIE - Poles' favourite beer, ŻUBR - the second largest Polish beer brand, LECH, Dębowe Mocne, Pilsner Urquell, Redd's, Dog in the Fog, Peroni Nastro Azzurro and Miller Genuine Draft. Kompania Piwowarska was established in 1999 as a result of a merger of Tyskie Browary Książęce and Lech Browary Wielkopolski. In 2003 Dojlidy Brewery in Białystok was acquired by KP and in 2008 a brewery



in Kielce. In the fiscal year F08, ended on 31 March 2008, KP sales volume amounted to 14.5 mill hectolitres.

Kompania Piwowarska is part of one of the world's largest brewing groups - SABMiller plc. SABMiller plc is one of the world's largest brewers with brewing interests or distribution agreements in over 60 countries across six continents. The group's portfolio of over 150 brands includes world-renowned international names and established local brands recognized for their superior quality and brewing excellence (Miller Genuine Draft, Grolsch, Peroni Nastro Azzurro and Pilsner Urquell). The company is also one of the largest Coca Cola bottlers outside the US. In the fiscal year F08 ended on 31 March 2008 SABMiller generated sales worth \$21.4 billion and profit before taxation of \$3.2 billion. Sales volume amounted to 239 mill hectolitres.

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The Federation of the Finnish Brewing and Soft Drinks Industries is a member of the The Brewers of Europe representing approximately 95% of Finland's beer production.

Beer, is a refreshing enjoyable beverage with relatively low alcoholic strength which brings pleasure and social interaction to many people. The vast majority of Finnish consumers drink responsibly and it is reassuring for those who do consume beer regularly to know that it can be part of an adult's healthy lifestyle, with the WHO also recognising the health benefits associated with responsible, moderate consumption.

Finland's brewers are committed to promoting responsible beer consumption and to being part of the solution with regard to tackling the alcohol misuse.

The Federation of the Finnish Brewing and Soft Drinks Industries does not believe that our Nordic alcohol policy model with high taxes and limited availability of beverages is an effective tool to prevent alcohol related harm. In Nordic countries measures that attempt to reduce overall consumption have neither prevented strong (recorded and unrecorded) consumption growth nor reduced problems.

What are your views on effective strategies to reduce alcohol-related harm?

In The Brewers of Europe's The Federation of the Finnish Brewing and Soft Drinks Industries' opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers are buying a drink, not just alcohol, and selecting their beverage (e.g. beer brand x) on the basis of numerous factors (including taste, occasion, culture, tradition, weather etc.), not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions may include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Health-sector preventive measures against hazardous and harmful alcohol consumption, such as screening and brief interventions;
- Educational tools for young people and families;
- Enforcement of existing national drink-driving legislation and tough sanctions that deter;
- Enforcement of legal purchasing and drinking age legislation;
- Drink driving reduction strategies, particularly for higher risk groups, such as repeat offenders and young drivers;
- Encouraging responsible serving in outlets.

On the other hand, The Federation of the Finnish Brewing and Soft Drinks Industries believes that measures which aim to reduce overall consumption:

- Have little effect on misusers;
- Compromise the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, The Federation of the Finnish Brewing and Soft Drinks Industries believes therefore that the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy;
- The WHO's six-point agenda for responding to challenges, wherein the third agenda point - strengthening health systems - can be acted upon through encouraging screening and brief interventions in the health-sector.

Building on these fundamental principles on the most appropriate ways to tackle alcohol-related harm, across Europe the brewing sector has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

AN INTERESTING INITIATIVE IN RESPECT OF INVOLVING ALL RELEVANT STAKEHOLDERS IS THE EU ALCOHOL AND HEALTH FORUM, LAUNCHED AT THE INITIATIVE OF THE EUROPEAN COMMISSION, WHICH IS BASED ON A POSITIVE, ACTION-ORIENTED, MULTI-SECTORIAL, MULTI-STAKEHOLDER APPROACH TO ADDRESSING THE PROBLEMS ASSOCIATED WITH INAPPROPRIATE ALCOHOL CONSUMPTION. THE FORUM AIMS TO PROVIDE A COMMON PLATFORM FOR ALL INTERESTED STAKEHOLDERS AT EU LEVEL THAT PLEDGE TO STEP UP ACTIONS RELEVANT TO REDUCING ALCOHOL-RELATED HARM. THAT THE EUROPEAN COMMISSION AND THE EU MEMBER STATES PROMOTE THE MULTI-STAKEHOLDER APPROACH AS A WAY FORWARD IN ADDRESSING ALCOHOL-RELATED HARM IS AN EXTREMELY PROMISING, THOUGH CHALLENGING, GESTURE. BY DEFINITION, ALL THOSE STAKEHOLDERS HAVING SIGNED THE FORUM'S CHARTER ENDORSE THIS APPROACH.

WE TRUST THAT SUCH AN APPROACH AS THE ALCOHOL AND HEALTH FORUM MAY BE CONSIDERED AS A TEMPLATE FOR SIMILAR PLATFORMS AT ALL DIFFERENT LEVELS.

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

The issue of tackling alcohol misuse is on the top of our agenda. The Federation of the Finnish Brewing and Soft Drinks Industries as a member of the Brewers of Europe is one of the first committers to the EU's Alcohol and Health Forum.

Our national commitment is "Drunk You're fool" -education campaign, which is aimed at binge drinking in Finland. We see that prohibitions and pure health education are not effective means of influencing attitudes, especially those of young adults. The campaign seeks to shape opinions so that binge-drinking will not be considered socially acceptable. Alcohol consumption by youth is declining and the campaign strengthens this trend.

Read more:

http://www.panimoliitto.fi/panimoliitto/en/press_releases/2008/pressrelease_151008_EFFIE.html

http://www.panimoliitto.fi/panimoliitto/en/press_releases/2007/pressrelease_270907.html

http://www.panimoliitto.fi/panimoliitto/en/press_releases/2007/pressrelease_050907.html

http://www.panimoliitto.fi/panimoliitto/en/press_releases/2007/pressrelease_270807.html



CONTRIBUTION DE LA CONFEDERATION EUROPEENNE DES VIGNERONS INDEPENDANTS A L'AUDITION DE L'OMS SUR LES MOYENS DE REDUIRE L'USAGE NOCIF DE L'ALCOOL

Paris, le 29 octobre 2008

Point 1 - point de vue sur les stratégies efficaces pour réduire l'usage nocif de l'alcool

Du point de vue de la Confédération Européenne des Vignerons Indépendants, il existe quatre facteurs clés de succès pour une stratégie dont l'objectif est de réduire l'usage nocif de l'alcool.

1. De manière générale, toute stratégie visant à modifier le comportement de certains individus doit être adaptée aux spécificités du contexte local, religieux et culturel.
2. De même, une stratégie efficace doit impliquer tous les acteurs, y compris les opérateurs économiques du secteur des boissons alcoolisées.
3. La stratégie doit s'appuyer sur les initiatives qui existent déjà, aux niveaux locaux, nationaux et supranationaux (en particulier en ce qui concerne l'Union européenne).
4. La stratégie doit viser la consommation abusive et nocive d'alcool ; car il est bien certain que ce n'est pas la consommation de boissons alcoolisées en soi qui est problématique.

Ainsi, l'efficacité d'une stratégie mondiale pour réduire l'usage nocif de l'alcool dépend en grande partie de sa capacité à intégrer les initiatives et stratégies existantes, dans le respect de la culture de chacune d'elle et des intervenants qui la portent.

Point 2 - point de vue sur les meilleurs moyens de réduire les problèmes liés à l'usage nocif de l'alcool dans une perspective mondiale

En ce qui concerne les moyens dédiés à la réduction de l'usage nocif de l'alcool, la Confédération européenne des vignerons indépendants tient à souligner que les constats tirés de l'expérience de divers pays conduisent à conclure que la stratégie la plus efficace est celle de l'éducation et de la responsabilisation.

Les pays ayant mis en place des stratégies reposant sur l'interdiction de consommation et la disponibilité des produits n'ont pas réussi à combattre les problèmes liés à la consommation abusive d'alcool. C'est le cas, en particulier, des pays nordiques pour l'Union européenne.

De même, le lien entre une augmentation de la fiscalité et une baisse de la consommation n'a jamais pu être démontré clairement. De plus, chez les publics « à risque », pour lesquels les boissons alcoolisées correspondent à des produits de première nécessité, l'élasticité de la demande est faible.

Une étude sur la concurrence entre les boissons alcooliques, commandée par l'Union européenne en 2001, souligne qu'en cas d'adoption de taux d'accises minimum indexés au taux de l'inflation européenne, « les spiritueux seraient largement avantagés ». Une telle mesure pourrait donc avoir des conséquences inverses aux effets escomptés. Il convient par ailleurs de souligner que des pays dans lesquels les taux d'accises sont nuls ne semblent pas pour autant souffrir de problèmes démesurés d'abus d'alcool (cas du Luxembourg).

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En revanche, les pays ayant mis en place des politiques de sensibilisation et d'éducation connaissent une amélioration de la situation en ce qui concerne l'usage nocif d'alcool. C'est le cas par exemple du Canada (Educ'Alcool, au Québec).

Ces politiques de sensibilisation et d'éducation sont justifiées par les schémas de consommation. Ainsi, on trouve dans la région méditerranéenne de l'Europe les niveaux de consommation d'alcool par habitant les plus élevés. Mais c'est aussi dans cette région qu'on trouve les schémas de consommation les moins risqués pour la santé.

Une approche basée sur les schémas de consommation permet aussi de prendre en compte le fait que les consommateurs ne cherchent pas à acheter et boire de « l'alcool », mais du vin, de la bière ou des spiritueux.

La consommation modérée de vin, caractéristique de certains schémas de consommation, notamment en Europe méditerranéenne, est tout à fait compatible avec un mode de vie sain.

Il est donc nécessaire, pour être ciblé et efficace, de prendre en compte ces différents schémas de consommation dans les politiques d'éducation.

Point 3 - Moyens par lesquels votre contribution est susceptible de réduire l'usage nocif de l'alcool.

Les vignerons indépendants sont en contact direct avec les consommateurs ; ils sont les seuls à maintenir le lien entre le producteur et le consommateur.

Cette spécificité inhérente à leur métier permet aux vignerons indépendants d'être des interlocuteurs privilégiés dans le débat sur les stratégies de réduction de la consommation abusive d'alcool.

Les vignerons indépendants respectent leurs produits. Ils sont naturellement des ambassadeurs d'une consommation respectueuse de leur produit, donc responsable.

Chaque vigneron indépendant est acteur de la promotion de la consommation responsable dans son caveau.

Au niveau de nos associations, la CEVI, Confédération Européenne des Vignerons Indépendants, est partenaire du programme Wine in Moderation (www.wineinmoderation.eu). Ce programme vise à promouvoir la consommation responsable de vin pour réduire les dommages liés à la consommation abusive d'alcool, au travers de plusieurs outils mis en place progressivement en Europe : message commun de modération, Conseil d'information sur le vin, programmes d'éducation sur l'art de vivre, promotion de standards commun de communication.

Le programme Wine in Moderation représente la contribution des organisations du secteur du vin (Comité Vin, Copacogeca, CEVI) au Forum Alcool et Santé de la Commission européenne.

Synthèse de la réponse de la CEVI

Pour la Confédération Européenne des Vignerons Indépendants, une stratégie mondiale de réduction de l'usage nocif de l'alcool doit avant tout être une stratégie en mesure d'intégrer les initiatives et stratégies existantes, dans le respect de la culture de chacune d'elle et des intervenants qui la portent.

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Par ailleurs, concernant les moyens pour mettre en œuvre cette stratégie, la CEVI est convaincue (de part les expériences et modèles de plusieurs pays) que la stratégie la plus efficace est celle de l'éducation, basée sur la prise en compte des schémas de consommation. A ce titre, il nous semble aussi important de souligner que la consommation modérée de vin est tout à fait compatible avec un mode de vie sain.

Les vignerons indépendants sont déjà engagés, concrètement, dans la lutte contre la consommation abusive d'alcool. Au niveau individuel, chaque vigneron est en lien direct avec le consommateur. Les vignerons indépendants respectent les vins qu'ils élaborent eux-mêmes. Ils sont naturellement des ambassadeurs d'une consommation respectueuse de leur produit, donc responsable.

Au niveau de nos associations, nous sommes engagés dans le programme Wine in Moderation (www.wineinmoderation.eu) dont l'objectif est la promotion de la consommation modérée de vin et la lutte contre la consommation abusive d'alcool en Europe.

La CEVI, créée en décembre 2002, regroupe environ 8000 vignerons indépendants européens, par le biais de ses fédérations adhérentes :

- *Vignerons Indépendants de France (VIF)*
- *Fédération Nationale des Vignerons Indépendants du Portugal (FENAVI)*
- *Association Suisse des Vignerons Encaveurs (ASVE)*
- *Organisation Professionnelle des Vignerons Indépendants de la Moselle Luxembourgeoise (OPVI)*
- *Association Hongroise des Vignerons Indépendants (MSZBFSZ)*
- *PROVIR-Bodegas Familiares de Rioja, représentant l'Espagne*
- *Family Estate Slovenia (FES)*

Les vignerons indépendants italiens rejoindront la CEVI très prochainement. La CEVI a des contacts étroits et privilégiés avec les vignerons indépendants roumains, bulgares et grecs.

Les vignerons indépendants sont des entrepreneurs élaborant et mettant en marché un produit personnalisé. Les vignerons indépendants respectent leur terroir, travaillent leurs vignes, récoltent leurs raisins, vinifient et élèvent leur vin, mettent en bouteille leur production dans leurs caves et commercialisent leurs produits.

L'objectif de la CEVI est de représenter et de défendre les intérêts des vignerons indépendants d'Europe.

Parce qu'il cultive ses vignes, vinifie son vin et signe sa bouteille de son savoir-faire, seul le vigneron indépendant garantit la continuité du lien entre terroir et produit.

Pour en savoir plus : www.cevi-eciw.eu !



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CONSULTATION SUBMISSION OF THE WINE INSTITUTE REGARDING THE WHO GLOBAL STRATEGY TO REDUCE HARMFUL USE OF ALCOHOL

WINE INSTITUTE

Since its beginning in 1934, Wine Institute has worked to support California's wine industry and to enhance the environment for the responsible consumption and enjoyment of wine. On behalf of more than 1,100 winery members and affiliated businesses, Wine Institute engages in an active dialogue with policy leaders, educators and media, as well as health, social and environmental organizations to establish high standards for our agricultural and business practices. Each of the Wine Institute programs are designed to address specific populations and needs. Some are national, some are specific to a state or region and others are locally based. This directed program approach is critical to the success Wine Institute programs have experienced over the past 75 years.

BACKGROUND

At the annual session of the World Health Assembly (28-24 May 2008), a resolution entitled "strategies to reduce the harmful use of alcohol" was adopted by the 193 member countries of the World Health Organization (WHA61/3). This Resolution gives the WHO the task of developing a "global alcohol strategy to address harmful use of alcohol" in the next 2 years. In response to WHO's invitation to contribute to an online public hearing from October 3-31, 2008, on ways to reduce harmful use of alcohol, Wine Institute is pleased to summarize the programs and initiatives which have been implemented to promote responsible moderate drinking patterns and reduce alcohol abuse and misuse related harm while highlighting wine's numerous contributions to the American culture, society and economy.

SELF-REGULATION INITIATIVES:

1. WINE INSTITUTE CODE OF ADVERTISING STANDARDS

Wine Institute advocates appropriate product advertising through its *Code of Advertising Standards* which has been upheld as a model of effective industry self-regulation. The *Code* was created as an informal set of principles in 1949 and went into publication in 1978 reflecting the California wine industry's strong commitment to social responsibility. Since its inception, the guidelines have undergone continued review and revision as media, advertising and wine industry practices advance. The *Code* includes numerous provisions to ensure that advertising reaches the intended audience of individuals of legal drinking age, as well as provisions to minimize exposure to people who are underage. With universal adoption by Wine Institute

members and a condition of membership, the *Code of Advertising Standards* is a signature expression of our members' commitment to social responsibility.

The effectiveness of the code has been recognized by the U.S. government Federal Trade Commission. With regard to advertising placement, the FTC found that more than 92 percent of radio, television, and print ads disseminated by the 12 major alcohol suppliers met the 70 percent standard that the audience consists of adults over 21. Because placements that missed the target were concentrated in smaller media, more than 97 percent of total alcohol advertising "impressions" (individual exposures to advertising) met the 70 percent standard. The report also notes that all three of the segments of the alcohol industry have now adopted systems for third-party review of advertising complaints.

2. WINERY TASTING ROOM PUBLICATION AND SERVER TRAINING WORKSHOPS

As Wine Institute is a membership organization of wineries that sell directly to the public in retail sales rooms at the winery, training is an important function of the association. Developed in 1992, the *Winery Tasting Room Publication* provides an overview of policies and best practices to promote responsible service at winery tasting rooms and events. Responsible wine service emphasizes the importance of creating an educational tasting environment where wine can be enjoyed in a responsible manner.

Tasting room managers and winery employees who serve wine to consumers are also offered *Responsible Beverage Service Training Workshops* to learn up-to-date responsible service techniques. The goal of these workshops is to reduce alcohol-related problems by educating the winery's staff on the sales and service of alcohol, and holding them accountable if their establishment violates laws, such as sales to minors and sales to obviously intoxicated patrons. Upon completion of the program the participants receive a two-year certification.

DEVELOPMENT AND SUPPORT FOR GOVERNMENT PROGRAMS

1. U.S. GOVERNMENT DIETARY GUIDELINES

Wine Institute participated in the development and endorses the *2005 Dietary Guidelines for Americans*, published by the Departments of Health and Human Services and Agriculture, which recommend moderation for those who choose to drink. The key recommendations include:

- Those who choose to drink alcoholic beverages should do so sensibly and in moderation – defined as the consumption of up to one drink per day for women and up to two drinks per day for men.
- Alcoholic beverages should not be consumed by some individuals, including those who cannot restrict their alcohol intake, women of childbearing age who may become

pregnant, pregnant and lactating women, children and adolescents, individuals taking medications that can interact with alcohol, and those with specific medical conditions.

- Alcoholic beverages should be avoided by individuals engaging in activities that require attention, skill, or coordination, such as driving or operating machinery.

2. SUPPORT FOR INITIATIVES THAT ADDRESS UNDERAGE DRINKING

Wine Institute supports a comprehensive bill aimed at preventing underage drinking called the “*STOP Underage Drinking Act*.” The bill, passed in 2006, had sponsorship across the political spectrum and from community leaders and parents to address the problem of alcohol abuse by underage youth. The Sober Truth on Preventing Underage Drinking “STOP” Act establishes a guide to federal underage drinking policy and program development; requires annual reports from states regarding programs, efforts and laws preventing underage drinking; develops outcome measures including reports on minimum-age compliance checks and law enforcement; funds and oversees underage drinking public service announcements; awards grants to reduce underage and binge drinking on college campuses; and supports studies on the impact of alcohol on the adolescent brain.

The Federal Trade Commission’s *We Don’t Serve Teens* initiative provides parents and other adults with tools and information they need to help reduce teen drinking. During the national “We Don’t Serve Teens Week”, the industry highlighted the campaign through advertising and web based education messages.

Wine Institute has developed and adopted the *Wine Industry Code for Direct Shipping* to insure, in part, the avoidance of sales to minors. Specific provisions in the code address underage access.

The Substance Abuse and Mental Health Services Administration (SAMHSA) annual 2007 National Survey on Drug Use and Health (NSDUH) stated that the level of alcohol use dropped among those aged 12 to 17, from 17.6% in 2002 to 15.9% in 2007. The Health and Human Services Secretary (Mike Leavitt) concluded the results confirmed progress has been made – particularly regarding substance abuse among younger Americans.

The National Institute of Drug Abuse (NIDA) reported in the 2007 Monitoring the Future Survey that a substantial long-term decline in alcoholism was observed in the past year alcohol use among 8th graders, down to 31.8% from its peak of 46.8% in 1994.

3. SUPPORT FOR EFFORTS TO REDUCE DRUNK DRIVING

For many years the Wine Institute supported the *National Commission Against Drunk Driving* and efforts to reduce impaired driving and its consequences by uniting a broad-based coalition of public and private sector organizations on this issue.

Wine Institute supports legislation requiring *alcohol interlock devices* for high BAC (0.15 and above) and multiple offenders.

Wine Institute supports the current *0.08 BAC standard* (blood alcohol content).

The National Highway Traffic Safety Administration (NHTSA) reported that in 2007 new national figures showed a significant decline in the number of drunk driving-related fatalities occurring nationally and a 3.7% decline in fatalities where drivers had blood alcohol concentrations (BAC) of .08 or higher compared with 2006.

4. SUPPORT FOR INITIATIVES THAT PROMOTE MODERATE CONSUMPTION

Wine Institute has helped fund public health organizations, educational institutions and social policy organizations to support the message of moderation and to discourage inappropriate consumption. These are organizations such as the American Heart Association, American Dietetic Association, Society for Nutrition Education, WomenHeart, and Research Society on Alcoholism.

Considering our industry's role as an exporter, Wine Institute also supports programs in foreign markets such as the CEEV's Wine in Moderation campaign in Europe.

Many of Wine Institute's winery members, both large and small, raise funds and support a wide variety of health, social and educational programs within their local regions through charitable contributions, auctions and special labels. Examples include the Regional auctions for which proceeds in the millions of dollars go towards supporting worker housing, youth programs, health care and mental health services, alcohol education and abuse prevention.

* * * * *

In sum, programs and efforts to reduce harmful use of alcohol should focus on the differences of the populations they seek to address. One program will not serve the goal nor will a series of centrally developed programs. In order to achieve the goal of reducing harmful use of alcohol governments, NGO's, economic operators, cultural and religious leaders must all work together to develop realistic programs that make a difference.

Brewers Association of Australia and New Zealand

FULL CONTRIBUTION (max. 2000 words)

In providing your contribution you may wish to focus on the following issues:

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

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

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

The Brewers Association of Australia and New Zealand Inc ('the Brewers Association') represents Australia and New Zealand's major manufacturing breweries on regulatory and broader public policy issues. The Brewers Association has a proud history of contributing to public debate across a variety of areas including taxation, advertising, and alcohol education. We maintain representation in the capitals of both Australia and New Zealand.

As well as responding to contemporary public policy reviews or inquiries, the Brewers Association also:

- Manages the regulation of alcohol advertising in Australia through involvement in the Alcohol Beverages Advertising Code Scheme ('the ABAC Scheme') and is an active supporter of self-regulation in New Zealand through the Advertising Standards Authority;
- Actively supports school-based education through *Rethinking Drinking*, an initiative of the Brewers Association that has funded the development of classroom materials based on harm minimisation and has trialled *Alcohol Information Nights* for students and parents, both of which have been independently evaluated; and
- Has an honorary medical advisor, based in New Zealand, to keep the Brewers Association up-to-date on developments in medical and epidemiological research in the areas of alcohol and health.

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

The Brewers Association believes that any strategy to reduce alcohol-related harm must necessarily be founded on a strong evidence base. Consequently, a robust alcohol strategy will seek to both maximise benefits and minimise harms, and have as its starting point that most consumers drink moderately, enjoy it and benefit from it, thus recognising the strong distinction between alcohol consumption and alcohol misuse.

Any alcohol strategy must recognise that alcohol misuse is not a problem of simple, linear cause and effect relationships. Instead, a raft of complex and interacting factors underlie a society's attitudes and actions towards alcohol use, dramatically reducing the likely effectiveness of any intervention taken in isolation. Therefore, it is essential that the background and diversity of societal and cultural settings be fully considered in any strategy.

The Brewers Association strongly believes that a partnership approach must be taken in formulating any strategy to reduce alcohol-related harm. This approach considers all stakeholders on an equal

Brewers Association of Australia and New Zealand

footing and recognises and actively seeks the input of all stakeholders in a debate.

The Brewers Association has long been a supporter of targeted education and social responsibility initiatives, including:

- Our proposal in the mid 1970s to create an advisory body to examine alcohol-related issues, which resulted in the creation of New Zealand's Alcohol Liquor Advisory Council;
- The Australian *Rethinking Drinking* program, which includes *Rethinking Drinking: You're in Control* classroom teaching materials, currently used in many Australian schools, and the *Rethinking Drinking: Alcohol Information Nights* program – a web-based resource that provides practical help to students and parents on how to minimise the harms associated with alcohol misuse through information evenings (see www.rethinkingdrinking.org);
- The Alcohol Beverages Advertising Code (ABAC) Scheme sits at the heart of Australia's system of alcohol advertising regulation. Australia has a quasi-regulatory system of alcohol advertising regulation. Advertising guidelines have been negotiated with government and complaints are handled independently. Industry bears all costs of administering the ABAC Scheme and members of the alcohol industry are barred from adjudicating complaints (see www.abac.org.au);
- *DrinkWise Australia*, which is an independent, industry-funded organisation that aims to create a responsible drinking culture through its goal of minimising the harm and maximising any benefits from alcohol consumption in Australia (see www.drinkwise.com.au);
- The Brewers Association sponsored the production of a *Pregnancy Lifescripts* DVD with our project partner, the Australian General Practice Network. The DVD builds on the *Pregnancy Lifescripts* materials developed for the Australian Department of Health & Ageing. The DVDs provide GPs with simple, evidence-based tools to assist in the provision of structured, consistent lifestyle advice on alcohol use to pre-pregnant, pregnant and breastfeeding women;
- The New Zealand Advertising Standards Authority was formed in 1973 and, consistent with the principles of self-regulation, administers the Code for Advertising Liquor;
- Voluntary introduction of graphical standard drink logos on beverage containers, which provide consumers with an easily identifiable and ready method of 'counting their drinks' thus promoting responsible drinking behaviours and better health outcomes; and
- An initiative of the Brewers Association, the Australian Brewers Foundation funded grants totalling \$AUD3.5 million over 20 years of operation (the program was finalised in 2005). The Foundation was an independent, brewer-funded program that promoted research into the relationship between alcohol and health.

The Brewers Association recognises that targeted strategies represent the most effective method of reducing alcohol-related harm. We strongly favour these targeted initiatives over broad, untargeted and largely ineffective, population-based measures that seek to solve problems using a prescriptive 'one size fits all' approach. We believe, through our experience in the programs outlined above, that any effective method aiming to create a culture of responsible drinking must be based on sound evidence and developed with all stakeholders in a debate engaged on a partnership basis.

Brewers Association of Australia and New Zealand

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

Given the wide diversity of global communities, the Brewers Association considers that any strategy to address harmful use of alcohol must necessarily be founded on recognition that 'one size fits all' policies are likely to be ineffective in solving issues that vary according to a raft of social and cultural mores. We strongly believe that targeted education campaigns are among the most effective methods of creating a culture of responsible drinking, and our long association with such programs supports this view.

Similarly, we believe that the success of these targeted programs lies in the engagement and involvement of many stakeholder groups. Approaches that attempt to dictate policy from afar without the engagement and support of *all* stakeholder groups are unlikely to succeed. Again, it must be recognised that most consumers drink moderately, enjoy it and benefit from it. There is a strong distinction between alcohol consumption and alcohol misuse.

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

The Brewers Association strongly advocates the responsible consumption of alcohol. Our approach to responsible consumption underpins our continued support of education and awareness campaigns in Australia and New Zealand. This approach recognises that most consumers enjoy, and benefit from, responsible consumption and are largely responsible for their own drinking choices.

The responsible drinking initiatives described in Question One, above, provide testament to our commitment to promote responsible drinking. This approach is founded upon our engagement with many stakeholder groups including, health, social and economic policy experts, and various levels of government, and our commitment has been demonstrated over time. Hence, we not only seek beneficial outcomes *vis-à-vis* public health and wellbeing through targeted measures to maximise benefits and minimise harms, but we also seek beneficial and cooperative processes through partnerships with stakeholders, which in our experience, magnifies the benefit available to *all* members of a community.

The Brewers Association of Japan (BAJ) was founded in 1953 and has been granted the state of a specially approved Non-Profit Organization in accordance with, and under the terms of Liquor Industry Association Act.

Members of BAJ are Asahi Breweries, Ltd., Kirin Brewery Co., Ltd., Sapporo Breweries Ltd., Suntory Ltd. and Orion Beer Co., Ltd.

One of the main objectives of the Association is to carry out promotion activities of preventing underage drinking and encouraging moderate consumption of alcohol.

BAJ believes that the effective measures to reduce the risk of harmful use of alcohol require following key initiatives;

- Full understanding of the diversity of societies, cultures and tradition surrounding drinking environment
- Pragmatic and cost effective measures based on evidence , taking consideration of a given specific social infra-structure of the market
- Engagement of all stakeholders and close partnership among them.

In this submission, we would like to stress particularly the importance and the value of the involvement of economic operators.

In Japan, we have been pro-active.

We would like to show, our wide range of activities to address alcohol related problems.

<Self-Regulatory Codes>

“Self-Regulatory Code of Advertisement Practices and Container Labeling for Alcoholic Beverages” was established in 1988 by Japan Liquor Industry Council, which consists of eight associations of producers, importers, and sellers. It regulates various area related to alcohol problems. In year 2006, self regulation code was strengthened from underage drinking point of view. 50% audience rating rule on TV-CF & magazine ads were introduced. And 25% rules for low alcohol beverages were introduced to prevent underage from drinking alcohol beverage as a juice by mistake.

1. Products (Warning Labels)

In addition to warning about “Underage drinking”, industry introduced wording on FAS in 2004. And in 2005, warning for “Excess Drinking” was

**Response from COPA and COGECA to the WHO
questionnaire on health problems related to alcohol
consumption
October 2008**

Background information

The World Health Organization has invited academic institutions, research departments, professional associations, non-governmental organizations and representatives of the industry, trade and agricultural sectors to express their views and opinions. These will be sent to the WHO secretariat via an internet public hearing and will focus on problems relating to alcohol consumption. The purpose of this survey is to provide the WHO secretariat with information on which policies can be implemented to tackle harmful alcohol consumption. Furthermore, the WHO secretariat would like to get some information on what stakeholders are doing to reduce the harmful use of alcohol.

You will find additional information on this WHO public hearing on its website (http://www.who.int/substance_abuse/activities/hearing/en/index.html)

For your information, aside from the internet questionnaire, the WHO has scheduled a number of consultations with stakeholders (economic operators, NGOs and Member States) on these topics. The consultation with economic operators will take place on 6 November. Copa-Cogeca has been invited to attend. The aim of these consultations is to hear the views of the different stakeholders in order to draft a global strategy on reducing the harmful use of alcohol.

WHO questionnaire

Summary

Most of the population that consumes alcohol does so in a way which is not harmful. However part of the population misuses alcohol and put themselves and their families in danger. For Copa-Cogeca it is therefore necessary to differentiate between measures aimed at tackling harmful alcohol consumption and measures aimed at preventing alcohol misuse.

Since this is a complex problem, both types of measures need to be based on sound and extensive scientific evidence.

Furthermore, in order to be effective, measures have to be tailored to the target population and to the result to be achieved. These measures should be targeted at risk groups such as pregnant women and children to prevent them from consuming alcohol, at consumers to prevent them from misusing alcohol or to people with alcohol consumption problems to help them solve them.

Restrictive measures are not necessarily the solution to the problem of harmful alcohol consumption. However, Copa-Cogeca strongly believes in the role of education to prevent harmful alcohol consumption.

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

Most of the population that consumes alcohol does so in a way which is not harmful nor poses any threat to their health. However part of the population misuses alcohol and put themselves and their families in danger. It is therefore necessary **to differentiate between measures aimed at tackling harmful alcohol consumption and measures aimed at preventing alcohol misuse.** Both are necessary but they are inevitably different.

The first type of measures needs to be tailored to the segment of the population affected by the problem in order to solve it.

The second has to address people that consume alcohol and eventually to potential consumers, in order to prevent it. It has to educate people on how alcohol must be consumed and teach them about the harmful effects of alcohol misuse.

Alcohol consumption patterns vary according to the country and its cultural habits, the type of product and the segment of the population. Harmful alcohol consumption depends on a number of complex issues. Since this is a complex problem, both types of **measures need to be based on sound and extensive scientific evidence.**

Copa-Cogeca does not believe that banning alcohol consumption is the solution to the problem of harmful alcohol consumption. First of all because, being a serious problem, it only affects a low percentage of people that consume alcohol. Secondly, because evidence demonstrates that past experiences of introducing bans have not avoided alcohol consumption. Furthermore, harmful alcohol consumption remains a serious problem in countries with very restrictive alcohol policies.

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

In order to be effective measures put in place in order to solve or to prevent alcohol misuse **should be tailored to the target population and to the result to be achieved.** The aim should not be to prevent alcohol consumption *per se*. These measures should be targeted at risk groups such as pregnant women and children to prevent them from consuming alcohol, at different groups of consumers to prevent them from misusing alcohol or to people with alcohol consumption problems to help them solve them.

Restrictive measures are not necessarily the solution to the problem of harmful alcohol consumption.

Taxation, for example, which is already applied in several EU countries, has not given the expected results. Contrary to North European Countries, alcohol taxes for wine in wine producing countries are set at the level of zero. However,

according to WHO data¹, wine producing countries have less harmful alcohol drinking patterns.

Copa-Cogeca strongly believes in the role of education to prevent harmful alcohol consumption.

Last but not least, before preparing new policies it is necessary **to reinforce existing national legislation related to alcohol consumption** (drinking and driving, alcohol sold to young people, etc).

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

Copa-Cogeca represents European farmers and their cooperatives. Therefore they represent wine producers. Indeed wine in Europe is mostly produced by farmers and their cooperatives.

Copa-Cogeca is very much concerned about harmful alcohol consumption. This is why it has created, together with CEEV (wine industry and trade) and CEVI (independent vineyards), a programme named Wine in Moderation (WIM) which aims at promoting moderation and responsibility in wine consumption. The WIM programme was designed to take into account the specificities of the European wine sector and its capacity to carry out effective activities to prevent harmful alcohol consumption. Given the importance of the wine sector in Europe and its fragmentation, it is possible to implement the WIM and deliver its message very effectively across every wine producing country... and even in consuming countries that do not produce wine.

The WIM is made up of four axes:

- “Wine in Moderation” common message. Message used in communication materials made available to our national and regional members so that they can spread the message at national, regional and local level. This material is available in several languages.
- “Art de vivre” (life-skills) education programme, targeted at different audiences. Its aim is to make moderation a habit and to teach about consequences of alcohol misuse.
- A Wine Information Council, which will share “best-practice” across the EU, stimulate independent research and keep an updated database with research and information material.
- Wine Communication Standards, built on existing national self-regulation codes, for commercial communications.

¹ WHO Alcohol in Europe Report, June 2006

FULL CONTRIBUTION (max. 2000 words)

In providing your contribution you may wish to focus on the following issues:

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

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

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

(1240 words)

The Verband der Brauereien Österreichs (Austrian Brewers Association) is the voice of the Austrian beer sector and represents the whole Austrian brewing industry, 66 brewing plants with approximately 4.000 employees.

In Austria, beer, made of natural resources only, is part of the national culinary heritage, a refreshing enjoyable beverage with relatively low alcoholic strength which brings pleasure and social interaction to many people. The vast majority of Austrian consumers drink responsibly and it is reassuring for those who do consume beer regularly to know that it can be part of an adult's healthy lifestyle, with the WHO also recognising the health benefits associated with responsible, moderate consumption. The Austrian brewers are committed to promoting responsible beer consumption and to being part of the solution with regard to tackling the alcohol misuse of the small percentage of consumers who drink excessively or inappropriately.

What are your views on effective strategies to reduce alcohol-related harm?

In the opinion of the Austrian Brewers Association, effective strategies to reduce alcohol-related harm need to

- Be evidence based and practical;
- Differentiate between moderate alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider and respect national and regional societies, cultures and traditions;
- Take account of the fact that consumers are buying a specific beverage, not just alcohol, and selecting their beverage on the basis of numerous factors (including taste, occasion, culture, tradition, weather etc.), not just alcoholic strength;
- Recognise the importance of prevention, especially education and training;
- Recognize that prohibitive measures are not successful but in the contrary often provoke abuse;
- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions may include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Health-sector preventive measures against hazardous and harmful alcohol consumption, such as screening and brief interventions;
- Educational tools for young people and families;
- Enforcement of existing national drink-driving legislation and tough sanctions that deter;
- Enforcement of legal purchasing and drinking age legislation;
- Drink driving reduction strategies, particularly for higher risk groups, such as repeat offenders and young drivers;
- Encouraging responsible serving in outlets.

On the other hand, the Austrian Brewers Association believe that measures which aim to reduce overall consumption:

- Have little effect on misusers;
- Compromise the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, Austrian Brewers Association believes therefore that the most effective approach needs to reflect

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy;
- The WHO's six-point agenda for responding to challenges, wherein the third agenda point - strengthening health systems - can be acted upon through encouraging screening and brief interventions in the health-sector.

Building on these fundamental principles on the most appropriate ways to tackle alcohol-related harm, across Europe the brewing sector has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

AN INTERESTING INITIATIVE IN RESPECT OF INVOLVING ALL RELEVANT STAKEHOLDERS IS THE EU ALCOHOL AND HEALTH FORUM, LAUNCHED AT THE INITIATIVE OF THE EUROPEAN COMMISSION, WHICH IS BASED ON A POSITIVE, ACTION-ORIENTED, MULTI-SECTORIAL, MULTI-STAKEHOLDER APPROACH TO ADDRESSING THE PROBLEMS ASSOCIATED WITH INAPPROPRIATE ALCOHOL CONSUMPTION. THE FORUM AIMS TO PROVIDE A COMMON PLATFORM FOR ALL INTERESTED STAKEHOLDERS AT EU LEVEL THAT PLEDGE TO STEP UP ACTIONS RELEVANT TO REDUCING ALCOHOL-RELATED HARM. THAT THE EUROPEAN COMMISSION AND THE EU MEMBER STATES PROMOTE THE MULTI-STAKEHOLDER APPROACH AS A WAY FORWARD IN ADDRESSING ALCOHOL-RELATED HARM IS AN EXTREMELY PROMISING, THOUGH CHALLENGING, GESTURE. BY DEFINITION, ALL THOSE STAKEHOLDERS HAVING SIGNED THE FORUM'S CHARTER ENDORSE THIS APPROACH.

WE TRUST THAT SUCH AN APPROACH AS THE ALCOHOL AND HEALTH FORUM MAY BE CONSIDERED AS A TEMPLATE FOR SIMILAR PLATFORMS AT ALL DIFFERENT LEVELS.

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

The Austrian Brewers Association has the issue of tackling alcohol misuse on the top of its agenda, and is - being a member of The Brewers of Europe - also committed towards the EU's Alcohol and Health Forum.

Furthermore the Austrian Brewers Association is involved in the national Austrian Alcohol Forum established by the Austrian Ministry of Health, Family and Youth.

- Within the framework of The Brewers of Europe commitments to the EU's Alcohol and Health Forum our association is cooperating with the national Austrian Self Regulation Organization to even improve the self-regulatory mechanisms already in place so as to ensure that commercial communications do not encourage inappropriate drinking behaviors.
- To this end the Austrian Brewers Association in 2007 also published its own specific "Kommunikationskodex der österreichischen Brauwirtschaft" (Communication Code of the Austrian Brewers) which was signed by all Austrian Brewers.

Over the last years the Austrian Brewers Association has cooperated in different prevention and education programs with other stakeholders such as

- National governments;
- Local and regional authorities;
- Road safety authorities;
- Driving schools;
- Police Authorities;
- Other civil society individuals (lawyers, teachers, attorneys, professors, academics etc.);
- Young people's groups (18-30);
- Health and medical associations;
- Self-regulatory organisations;
- Horeca, Retailers and Distributors;
- Media Broadcasters;
- Advertising Agencies;
- Other industries.

Initiatives supported by the Austrian Brewers Association aimed at education, training, prevention and tackling misuse, particularly with a view to addressing underage drinking, include:

- Youth Work of a Vienna Soccer Club (2001-ongoing) – a project in cooperation with a psychiatrist to educate youth trainers at a Vienna soccer club on how to deal with specific problems (e.g. alcohol related).
- "Zero" (2001-2006) – an internet game on the dangers of drinking and driving (in cooperation with the Austrian Automobile and Touring Club)
- X-periment (1998-ongoing) – drinking and driving project (in cooperation with ERSF-European Road Safety Federation, the Austrian Automobile and Touring Club, The Amsterdam Group and YES).
- A new initiative to deter young people from drinking and driving – again in cooperation with the Austrian Automobile and Touring Club – will start early 2009.
- "BierWissen" (2006-ongoing) – comprehensive educational material for students who are training in hospitality and tourism or in hotel management that includes an extensive chapter on responsible drinking.
- Beer & Health Symposium (2003) and leaflet "Bier und Gesundheit"

The British Beer & Pub Association (BBPA) is the UK's leading organisation representing the interests of the sector. Our member companies comprise brewers who produce 98 per cent of beer sold in the UK and pub companies that own two thirds of the nation's 57,000 pubs.

What are your views on effective strategies to reduce alcohol-related harm?

To have a sustainable impact, effective strategies to reduce alcohol-related harm need to:

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the specificities of beer and other categories of alcoholic drinks;
- Recognise the importance of education and training;
- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Interventions for heavy drinkers and those at greater risk, particularly underage people;
- Educational tools for young people and families;
- Enforcement of existing national drink-driving / purchasing age legislation;
- Drink driving reduction strategies, particularly for repeat offenders;
- Encouraging responsible serving in outlets.

On the other hand, measures which aim to reduce overall consumption:

- Have not been shown to be effective interventions to reduce health problems associated with alcohol misuse; and
- Compromise the pleasure of the millions who drink responsibly.

Consumer access to and enjoyment of alcohol commonly takes place through the retail environment. The framework that surrounds alcohol retailing plays a vital role in tackling and reducing harms. Such a framework should:

- Clearly establish the shared responsibility of the leisure and hospitality sector and other retailers (shops, supermarkets etc);
- Establish partnership between legislators and business – recognising business developed good practice as an effective mechanism for rapidly deploying flexible solutions;
- Be based on a formal retail licensing system that establishes appropriate checks and balances on retail practices together with appropriate sanctions and penalties;
- Establish a legal minimum age for the sale of alcohol that is enforced at both corporate and individual levels;
- Be complemented by a legal framework that clearly defines expected standards of individual behaviour - such as in relation to public drunkenness and alcohol fuelled antisocial behaviour or violence;
- Ensure that the legal and regulatory system is transparent and visibly enforced at both the corporate and individual levels;
- Achieve a balance between a formal legal and regulatory framework and effective self-regulation;
- Encourage a training structure that enhances the professionalism of the retail sector;
- Recognise that alcohol misuse can take place at home and around the home as well as when people are out socialising in the leisure and hospitality sector.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, we believe therefore that the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy.

Building on these fundamental criteria, the brewing sector therefore has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

An interesting initiative in respect of involving all relevant stakeholders is the EU Alcohol and Health Forum, which is based on a positive, action-oriented, multi-sectorial, multi-stakeholder approach to addressing the problems associated with inappropriate alcohol consumption. The Forum aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm. That the European Commission and the EU Member States promote the multi-stakeholder approach as a way forward in addressing alcohol-related harm is an extremely promising, though challenging, gesture. By definition, all those stakeholders, including the BBPA, having signed the Forum's Charter endorse this approach.

We trust that such an approach as the Alcohol and Health forum may be considered as a template for similar platforms at all different levels.

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

The BBPA has a recognised reputation for the development and implementation of good practice standards throughout the sector. The Association has a long-standing track record of active and effective partnership working with local and regional authorities and national government.

The BBPA worked closely and constructively with Government in the role of industry stakeholder in the development of the UK Government's National Alcohol Harm Reduction Strategy, establishing a comprehensive policy framework for targeting and tackling the harms associated with alcohol misuse in the UK.

Subsequent to the launch of that Strategy in March 2004, the BBPA has continued to work alongside Government, public authorities and other stakeholders on the implementation and ongoing refinement of the alcohol policy agenda. In November 2005, The BBPA launched with Government and a partnership of alcohol producing and retailing organisations the comprehensive *Social Responsibility Standards for the Production and Sale of Alcoholic Drinks in the UK*. We are currently responding to consultation on this subject and have on-going discussions with Government Departments on all aspects of the alcohol strategy in the UK. We are also in discussion with the Prime Minister's office on alternative measures to change behaviours and address alcohol misuse.

The BBPA has an active programme of corporate social responsibility development and monitoring to ensure the industry is proactively tackling issues within its control and influence that contribute to the targeting of alcohol misuse.

The BBPA was instrumental in establishing and providing funds for the Alcohol Education Research Council in the UK, has established its own UK fund for independent research into health effects of alcohol consumption and contributes to the European Research Advisory Board.

The BBPA also exercises the leading role for the UK sector in Europe working through the Brewers of Europe and HOTREC and is an active member of the European Alcohol and Health Forum. It also exercises its responsibilities globally through active engagement in the Worldwide Brewing Alliance.

The British Beer & Pub Association itself is already contributing to the reduction of alcohol-related harm. We play a leading role in this matter, particularly in facilitating the sharing of best practice and experiences and stimulating and encouraging new initiatives. Concrete examples include:-

Promoting the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks in the UK. These were developed by the drinks industry in partnership with the Government and launched in November 2005. Sixteen national bodies – including the BBPA and the British Hospitality Association have signed up to the new code. The Standards come under fierce criticism in the DoH consultation “Safe, Sensible, Social”, on the basis of a study carried out by KPMG earlier this year. The BBPA has analysed the KPMG report and found it to be flawed in the extreme, and not a basis on which to propose additional rules for the licensed trade, regardless of whether these are voluntary or mandatory.

Standards on Point of Sale Promotions. This guidance which is included in the Standards Document (above) replaced the previous BBPA guidance in 2005. All BBPA's members are signatory to these standards, are committed to ensuring that irresponsible promotions (as identified by the document) are not run within their businesses and that their brands are not identified with such promotions. The Standards are currently being reviewed.

Challenge 21. A BBPA poster was produced in response to increased enforcement focus on underage sales in recent years. Over 300,000 posters have been circulated to BBPA members, pubwatchers, police and local authorities since Spring 2006. The industry continues to tackle the issue. There are difficulties, one of which is reliable proof of age. The PASS scheme helps with this, and passports and driving licences are also acceptable ID. Staff are doing the best they can to uphold the law and need the support of managers, companies, trade bodies and enforcers. BBPA continues to reinforce the messages and support members. This initiative forms the British Beer & Pub Association commitment to the EU Alcohol and Health Forum at an estimated cost of €4.5 million per year.

Endorsement of the Proof of Age Standards Scheme (PASS). PASS was officially launched with the backing of the Home Office and the Department for Education and Skills in January 2003 following discussions between the licensed trade, the off-licence (retail) trade and other interested parties to agree a set of minimum information criteria and a forge proof logo/hologram for proof of age cards. To date, five different national and fourteen regional card schemes have been accredited by PASS.

Best Bar None (BBN). Best Bar None is supported by the Home Office and was originally piloted in Manchester. The scheme has now been rolled out to cities throughout the UK and Scotland and its aims are to award and encourage high standards in the licensed trade. Licensed premises participating in a BBN scheme aim to meet a minimum benchmark set to reassure customers about the safety of a venue. BBN schemes are set up on a local basis and promote: responsible sale of alcohol, customer safety, exclusion of troublemakers, no under-age drinking, good neighbourhood relationships, drug awareness and staff training. BBPA is represented on the BBN Steering Committee.

Support for Business Improvement Districts (BIDs). These were introduced by planning law in 2004, and provide for the establishment of cross agency partnerships where local businesses agree to pay a levy to provide improved town centre facilities. Those businesses in the BID are able to vote on what the funds are used for, so the process is very democratic and is supported by the BBPA and its members. There are currently over 60 BIDs in the UK with at least another ten in the process of development. The BBPA is particularly active in the first night-time-economy BID in Nottingham which has recently been instituted and looks forward to its development.

Support for Drinkaware. This evolved from the Portman Group's campaign/educational role. Set up to co-ordinate all initiatives surrounding alcohol education and campaign. Representation is split 50:50 between industry and medical/health experts. BBPA members contribute to the Drinkaware Trust.

Funding for National Pubwatch. This is a voluntary organisation set up to support existing pubwatchers and encourage the creation of new pubwatch schemes with the key aim of achieving a safe, secure social drinking environment in all licensed premises throughout the UK helping to reduce drink-related crime. The BBPA has pledged funding of £75,000 per year 2006-09 to support

the work of Pubwatch. Local pubwatches are run by licensees and provide a forum in which they can exchange information and promote good practice and working relationships with local enforcement agencies.

Risk Assessment - Polycarbonates/Violence in Pubs. In 2007, BBPA and Noctis jointly published a risk assessment tool on safety in pubs and clubs overall in order to identify and minimise inherent risks associated with on-licensed premises.

All these actions and initiatives are supported by BBPA members and are designed to minimise alcohol related harms and encourage responsible consumption.

FULL CONTRIBUTION**1. What are our views on effective strategies to reduce alcohol-related harm?**

In FED. Ho.Re.Ca Vlaanderen's opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm, need to:

1. Encourage responsible behaviour;
2. Be designed for the long term;
3. Distinguish between consumers and abusers;
4. Differentiate between alcohol consumption and alcohol misuse;
5. Be evidence based and practical;
6. Engage stakeholders through partnerships.

Thus, effective, targeted interventions may include:

- Enforcement of legal purchasing and drinking age legislation;
- Drink driving reduction strategies, particularly for higher risk groups, such as repeat offenders and young drivers;
- Encouraging responsible serving in outlets;

2. From a global perspective, what are the best ways to reduce problems to harmful use of alcohol?

To tackle alcohol-related harm in the most appropriate way the horeca sector has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders. (see also the summary of contribution)

3. In what ways can our organization contribute to reduce harmful use of alcohol?

If the EU's strategy to support Member States in reducing alcohol-related harm remains focused on nurturing best practice initiatives that, on the local level, target alcohol misuse where it occurs, then FED. Ho.Re.Ca Vlaanderen remains committed to developing and further improving the campaigns mentioned in the summary of contribution.

FULL CONTRIBUTION (max. 2000 words)

The Union of the Brewing Industry Employers in Poland – Polish Breweries is a voice of 90% of Polish Beer sector.

We are strongly opposed to youth easy access to alcohol, drinking and driving, excessive, irresponsible consumption of beer and misuse of alcohol generally.

All these are complex, societal problems and there are not easy, quick solutions.

We all: GO's, NGO's, police, local institutions and authorities, educators, parents and producers have a role to play in the prevention.

Since 2003 the Union has conducted campaigns increasing public awareness, changing attitudes, promoting responsible beer consumption.

What are your views on effective strategies to reduce alcohol-related harm?

In our opinion an effective strategy should:

- Not demonise beer as such; beer has been associated with humans for centuries.
- Not be targeted at alcohol per se and total consumption; against irresponsible consumption and alcohol misuse in real.
- Be based on strong evidence and consultation process with all stakeholders.
- Recognize and identify the drivers of drinking behaviours.
- Be designed considering fully local cultures, traditions and diversity of societies.
- Position education and training as the main pillars of effectiveness.
- Be designed for the long term in partnership.
- Encourage responsible behaviour / consumption.
- Involve adequate intervention.
- Educate properly young people and families.
- Not punish the millions of consumers, those who drinks responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective the Polish beer sector believes that the best effective ways to reduce problems should:

- Not imply a one-size-fits policy.
- Engage all legitimate stakeholders.
- Reflect balanced approach between restriction / effective intervention and education.
- Promote education and training.
- Increase awareness and change behaviours through education.
- Enhance the Forum role / initiative in tackling alcohol related problems.
- Exchange the best practice; implement / adjust effective well-working initiative to local circumstances / conditions.

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

The Union of the Brewing Industry Employers in Poland takes an active part in many initiatives aimed to promote responsible drinking, developes / supports concrete projects which target misuse with governmental and other stakeholders partnerships.

The Union has signed up in October 2006 the European Road Safety Charter.

As a member of the Brewers of Europe we are committed to the EU's Alcohol and Health Forum.

The union submitted the commitments on underage drinking, drinking and driving and self-regulation, joining the national SRO.

Our commitments are aimed at:

- **Underage drinking:**
 - o encourage retailers to act responsibly and according to the law
 - o educate shop assistants how to refuse alcohol to minors
 - o raise social awareness and sensitivity to the problem of alcohol sales to minors
- **Drinking and driving:**
 - o to encourage customers to adopt responsible attitudes and behaviours: never drive after drinking, never let others drive after drinking,
 - o to promote the designated sober driver concept
- **Self-regulation:**
 - o promote and sell our products in a responsible way, ensuring high standards of advertising, promotion and sponsorship.
 - o provide better cooperation / actions on responsible commercial communication and sales

Concrete activities:

Since 2003 the Union has conducted campaigns increasing public awareness, changing attitudes, promoting responsible beer consumption:

- “Alcohol – underage no access”: started in 2003 and ongoing. Three editions already made, with the participation of local authorities and communities. The campaign is dedicated to retailers and adult witnesses of alcohol sale to underage. The union distributed educational materials to retailers, Public TV broadcasted a tv documentary series featuring cases from all over Poland, with the support of experts’ and MEPs’ opinions; quantitative research studies;
- Signing and committing to the European Road Safety Charter (2006 and ongoing);
- “Driving not drinking”: started in 2006 and ongoing. Based on the designated driver (animations at HoReCa points). Introduction of responsible labels on beer cans and bottles; creation and recruitment for the Responsible Driver’s Club based on on-line platform; cooperation with the National Road Safety Council, the police and local authorities. More than 70 000 people educated in a face to face interviews and animations, almost 7000 people became DRIVERS;
- Signing and committing to the EU Alcohol and Health Forum’s Charter (2007 and ongoing);
- Submitting 6 commitments under the umbrella of Brewers of Europe to the EU Alcohol and Health Forum (2007, 2008)
- Joining the National Self-Regulation Organization (representing advertising bodies in Poland and covering 7 operational standards) (2008)
- Partnership in the European Night without Accident event.

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on ways of reducing harmful use of alcohol
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It is well-established that most people who consume alcohol do so in moderation. Alcohol-related harm is largely related to high risk drinking behaviour among a minority of people and therefore it is patterns of alcohol consumption, rather than overall consumption that provide the best predictor of harm. Therefore, if strategies for minimising harm are to be effective they need to be targeted to address risky drinking patterns rather than average per capita consumption of the population.

Effective interventions to reduce health-related problems associated with alcohol consumption

Drinking patterns vary across Europe, gender and age groups. These patterns, rather than over-all consumption of alcohol, are the best predictors of harm. Therefore, to achieve long-term sustainable results, only interventions which have proven to effectively address harmful drinking patterns should be eligible.

The evidence does not support any one single approach to harm-minimisation, but instead flexible approaches are needed that can be adapted to address specific needs of target populations. National strategies are likely to be more effective if supported by local community-based programmes, involving all relevant stakeholders.

Effective enforcement of legislation such as on drink driving legislation has been shown to be effective in reducing harm. It is also essential that existing legislation on minimum Legal Purchasing Age be enforced and this should be backed up by server training for bar and retail staff.

Education and information campaigns can be effective as part of a broader harm-reduction strategy. Evidence shows that education will be most effective when clear goals are established; campaigns are targeted to the audiences most at risk, programmes are realistic when considering their audience needs; and education is part of a broader community approach.

Effective examples developed in public/private partnership include a number of initiatives:

- ▶ **To discourage underage drinking and enforce legal purchasing age:** e.g., awareness campaigns on legal purchasing age and sanctions for infringements; education programmes to help young people resist peer-pressure, social norming campaigns, support for parents, actions during nightlife.
- ▶ **To promote responsible drinking:** e.g. consumer information on responsible drinking guidelines (including for pregnant women). Interactive tools, with relevant messages talking directly to the consumers, including tips to adopt a responsible behaviour.
- ▶ **To discourage drink-driving:** e.g., designated driver campaigns, promotion of alternative transportation, easy access to breathalyzers, server training and more public transport at night,.
- ▶ **To promote responsible service of alcohol through training:** development of knowledge and skills of those selling/serving alcoholic beverages on how to implement the law (e.g., not serving people under the legal purchasing age or intoxicated people) and how to promote a safe drinking environment.
- ▶ **To minimize harm at workplace:** e.g., adoption of specific alcohol policy, including road safety plans.
- ▶ **Support to health professionals** both through their primary education and long-life vocational training.
- ▶ **Brief interventions** in emergency rooms

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In addition, effective industry self-regulation and co-regulation of marketing is also important to prevent marketing that encourages irresponsible drinking patterns. .

The European Forum for Responsible Drinking (EFRD) contribution to reduce harmful use of alcohol

EFRD is an alliance of leading European alcoholic beverages producers supporting targeted initiatives to promote responsible drinking. EFRD members include: Bacardi-Martin, Beam Global Spirits & Wine, Brown-Forman, Diageo, Moët-Hennessy, Pernod Ricard and Rémy-Cointreau.

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EFRD's mission:

- Drive positive change in attitude and drinking behaviour by promoting responsible drinking and discouraging risky drinking.
- Identify and co-finance with relevant partners, flagship programmes that contribute in reducing alcohol-related harm.
- Enable the spirits industry to meet the expectations of stakeholders in relation to responsible marketing and self-regulation.

EFRD in action:

- *Development of measured and evaluated template programmes (available at www.efrd.org):*
 1. Designated driver campaigns: we offer guidance on development, communication and evaluation of designated driver campaigns. EFRD now has six years experience with the Pan-European designated driver campaign so is well placed to offer expertise.
 2. www.talkaboutalcohol.eu:
 - Website with three pillars that address teachers, children from 11 to 16 yrs old and their parents.
 - Piloted in UK, Spain, Czech Republic, with thorough evaluation.
 - Has been expended in Sweden (school part), in the Netherlands (parents part).
 3. Consumer Information Website:
 - To support commitment of the CEPS¹ Charter on consumer information on what is moderate drinking, EFRD developed a template consumer website (peer-reviewed by scientists) as well as guidelines to disseminate the site. In order to drive consumers to this site while offering a single address to companies, EFRD and CEPS will launch on 23 October an EU portal: www.responsibledrinking.eu.

¹ CEPS-European Spirits Producers Association

4. Training for Responsible Service of Alcohol: a new training handbook for server (including guidance for teachers to draft teaching outline and deliver the course) has been funded by EFRD and ICAP². The handbooks were developed by a UK NGO (Alcohol Focus Scotland) and have been piloted in Hungary with positive results through pre/post evaluation, which also includes a follow up after 5 months by telephone interview.
- *Exchange of good practice:*
 1. 160.000€ as kick start funding for national prevention programmes allocated through a call for tender.
 2. Since 2002, EFRD brings all the Social Aspects Organisations (SAO³) across Europe and beyond, including Canada and the USA to join an informal meeting to exchange information on prevention activities.
 3. Drinks Industry Initiatives Brochure (4th edition in 2008): the objective is to inform our national and EU stakeholders on work undertaken by the spirits industry (companies, trade associations and SAOs) to reduce alcohol-related harm while serving as an exchange of good practices among those involved in such prevention activities.
 - *EFRD works with all actors in the supply chain to promote responsible marketing.*
 1. EFRD Common Standards on Commercial Communications with additional Guidelines to cover the main communication channels. In 2008, EFRD has drafted new Guidelines on Internet Marketing which have been opened to consultation with external stakeholders.
 2. TV and Print Compliance Monitoring since 2005 in 19 European countries, done by the national Self Regulation Organizations (SROs⁴) in coordination with the European Advertising Standards Alliance (EASA) and reviewed by an independent reviewer's panel composed of three people from youth, advertising industry and NGO.

² International Center for Alcohol Policies

³ SAO: Industry funded association at national level to: 1) Encourage responsible alcohol consumption; 2) Promote and partner in efforts to reduce alcohol-related harm and 3) Help provide balanced and accurate consumer information. See list on EFRD website: www.efrd.org.

4 SRO : Body set up and funded by the advertising industry to apply a code or rules

3. On-line training tool on EFRD Common Standards: www.marketresponsibly.eu launched in April 2008, after consultation with national and EU stakeholders. The site will be annually updated with examples for the TV/Print Compliance Monitoring Report and will be evaluated amongst those registered.

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For more details on EFRD activities, please visit: <http://www.efrd.org>

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regulating advertising content. See list on EASA website: www.easa-alliance.org.

The Brewers Association of Japan (BAJ) was founded in 1953 and has been granted the state of a specially approved Non-Profit Organization in accordance with, and under the terms of Liquor Industry Association Act.

Members of BAJ are Asahi Breweries, Ltd., Kirin Brewery Co., Ltd., Sapporo Breweries Ltd., Suntory Ltd. and Orion Beer Co., Ltd.

One of the main objectives of the Association is to carry out promotion activities of preventing underage drinking and encouraging moderate consumption of alcohol.

BAJ believes that the effective measures to reduce the risk of harmful use of alcohol require following key initiatives;

- Full understanding of the diversity of societies, cultures and tradition surrounding drinking environment
- Pragmatic and cost effective measures based on evidence , taking consideration of a given specific social infra-structure of the market
- Engagement of all stakeholders and close partnership among them.

In this submission, we would like to stress particularly the importance and the value of the involvement of economic operators.

In Japan, we have been pro-active.

We would like to show, our wide range of activities to address alcohol related problems.

<Self-Regulatory Codes>

“Self-Regulatory Code of Advertisement Practices and Container Labeling for Alcoholic Beverages” was established in 1988 by Japan Liquor Industry Council, which consists of eight associations of producers, importers, and sellers. It regulates various area related to alcohol problems. In year 2006, self regulation code was strengthened from underage drinking point of view. 50% audience rating rule on TV-CF & magazine ads were introduced. And 25% rules for low alcohol beverages were introduced to prevent underage from drinking alcohol beverage as a juice by mistake.

1. Products (Warning Labels)

In addition to warning about “Underage drinking”, industry introduced wording on FAS in 2004. And in 2005, warning for “Excess Drinking” was added. These were made to meet growing social requirement.

2. Marketing

1) Enforcement of Self-Regulation Codes

Advertising Screening Committee was established in 2006. The Committee is an independent organization. Based on self-regulations of the industry, it monitors marketing practices run by alcohol companies and deals with complaints and/or doubts raised by consumers. The members of the Committee consist of governmental authorities, public health sectors, educational authorities and others.

<Initiatives to Prevent Drinking Driving>

“Drinking Driving” has been a serious issue. Especially since 2006, one tragic traffic accident by drunk driver elevated public attention dramatically. The industry acted quickly to combat “Drinking Driving” problems with following voluntary measures.

1) Warning Words

Beer industry immediately inserted warning words “Drinking and driving is prohibited by law” on all advertizing materials. This is one of evidence of industry’ s quick response.

2) Warning poster of “Drinking driving” for On-premise market

Brewers’ sales persons distributed and displayed them in the bars and restaurants.

<Consumer Education>

1) Enlightenment Materials

Japanese brewers have been producing enlightenment materials such as textbooks and video tapes warning the harm of underage drinking, and donating them to junior-high/ high schools and public organizations on demand.

2) Japan Health and Alcohol Incorporated Association

Japan Health and Alcohol Incorporated Association, which was established in 1980, is an evidence of multi-stakeholders’ approach to address alcohol related problems. It is now jointly supervised by Ministry of Finance Japan and Ministry of Health, Labor and Welfare. Its members are from various fields:

School authorities, Medical Field, government, Retailers. BAJ also participate in the Association.

The purposes of this association are

- a) Enlightenment of “responsible drinking” and “moderate drinking” and against “underage drinking”.
- b) Conducting research on alcohol beverage and health collaborating with universities and institutes.
- c) Supporting activities relating to “moderate drinking” and/ or ”against under age drinking” carried out by academics.

<STOP! Underage Drinking Campaign>

1) STOP! Underage Drinking Campaign

We have been carrying out project called as "STOP! Underage Drinking" since 2005. The project is led by us and our five member companies (Suntory Ltd., Asahi Breweries, Ltd., Kirin Brewery Co., Ltd., Sapporo Breweries Ltd., and Orion Beer Co., Ltd.)

Organizations and individuals who agree to these objectives are welcome to participate in the project. Participants utilize symbolic "STOP! Underage Drinking" logo. They make use of other "STOP! Underage Drinking" tools like badges and POP materials.

And, we put a series of advertisements for in the paper and transport ads for each of adults and minors for stopping underage drinking. Moreover, all television commercials and advertising for alcoholic beverages are required to bear the "STOP! Underage Drinking" mark.

The awareness of our activities has increased steadily. According to our last research conducted on April 2008, 86.5% of underage surveyed in Japan (N=200) were familiar with the project's mark and 87.5% of the 200 underage have an awareness that underage drinking is bad and illegal. Additionally, 87.8% of adults (N=600) have a feeling of guilt about prompting underage drinking.

Recognition rate of the project among underage (N=200)

86.5% on April 2008

77.5% on October 2007

81.0% on April 2007
73.5% on October 2006
56.0% on April 2006
49.0% on October 2005

Awareness that underage drinking is bad and illegal, among underage
(N=200)

87.5% on April 2008
87.5% on October 2007
83.5% on April 2007
79.5% on October 2006
75.5% on April 2006
75.5% on October 2005

Feeling of guilt about inviting underage to drink, among adults (N=600)

82.7% on April 2008
81.8% on October 2007
80.0% on April 2007
82.3% on October 2006
78.5% on April 2006
78.7% on October 2005

2) Poster & Slogan Campaign for Students

The Poster & Slogan Campaign started in 2003 asking junior high and senior high students to create enlightening posters and slogans which are designed to prevent underage from drinking alcoholic beverages. More than ten thousand students and schools apply to this campaign every year. The campaign is supported by National Tax Agency, Ministry of Health and Welfare, Ministry of Education and Culture and other associated stakeholders, and the excellent works have been awarded and they are displayed in the relevant places. The campaign has been very successful and effective because of the direct involvement of target audience and let them send their own messages to the peer group.

3) Cooperation to “Ikkinomi” (binge drinking) Prevention Campaign

In Japan, one of the alcohol related problems has been binge drinking. Young people in particular tend to enforce binge drinking among particular members and colleagues, putting them at risk of acute alcohol poisoning.

The Brewers Association of Japan cooperates to NGO “ASK” (Japan Specified Non-profit Corporation to Prevent Alcoholic and Drug Problems) in relation to “Ikkinomi” (binge drinking) Prevention Campaign. Unique preventive coasters which are used to decline unwelcome forced drink humorously, and posters which are widely enlightening to prevent alcohol harassment have been created every year. The messages are also available through mobile phone site. The Campaign has enjoyed positive results.

<Summary>

As the result of our continuous activities in cooperation with associated stakeholders, we have successfully obtained the positive effects in the main areas of harmful use of alcohol in the country.

First of all, the recent survey of underage drinking shows that the proportion of underage drinking has declined; for junior high school third grade male students, 26.0% in 1996 decreased to 16.7% in 2006, and for the female of the same grade, 16.9% in 1996 decreased to 14.7% in 2006. For senior high school third grade male students, 53.1% in 1996 reduced to 38.4% in 2006, and for the female of the same grade, 36.1% in 1996 reduced to 32.0% in 2006. We believe that our activities have been positively contributing to preventing underage drinking.

Secondly, the survey of the proportion of the number of drinking drivers’ fatal accidents showed remarkable decrease in the past ten years; 16.0% in 1998 reduced to 6.8% in 2008. This is partially due to our activities such as warning messages inserted into the television advertisement and warning posters harmonized with the legislation and government’s requests as well as the fact that the Road Traffic Law was amended to impose tougher penalties.

Thus, the Brewers Association of Japan has constantly been pro-active in tackling alcohol related problems, closely communicating with and cooperating with the National Tax Agency, Ministry of Health, Labor and Welfare, other concerned Ministries, NGOs and associated stakeholders, and this policy has been contributing to reduce harmful use of alcohol in Japan.

There is no denying the fact that when people drink irresponsibly, there is potential for considerable social, psychological and physical harm to them selves and to the communities they live in.

The reasons as to why some people drink irresponsibly are many and complex. While there are no simple solutions to the issue of irresponsible alcohol behaviour, there are measures that can make a difference. Measures that include understanding the root causes of irresponsible behaviour, that support and encourage inclusive and multistakeholder participation in finding possible and practical solutions. Simply denying people access to alcohol has not worked so far and may not in the future. What is crucial is to raise awareness about irresponsible drinking behaviour through all possible channels, make correct information available, help people make decisions on the basis of correct and unbiased facts and finally reach out to ones who are most at risk, with help and support.

It is common knowledge that education begins at home. Studies show that, parents, families and communities can make a big difference in creating an environment that encourages and promotes responsible behaviour and moderation.

Governments need to strengthen these efforts by initiating comprehensive awareness and information drives with active support from the industry. The key areas of intervention include

- Engaging with adolescents about the dangers of underage drinking
- Starting country wide education and intervention programmes about drunken driving
- Educating retailers on their role in promoting responsible behaviour.

A very key area where governments can play a decisive role is adopting supportive policies to reduce alcohol-related harm. Creating conditions conducive to steering consumers progressively towards lower alcohol products would be a concrete step in this direction. In India for instance a low alcohol product like beer is actually is taxed about 60% higher than hard liquor thus turning a consumer towards the latter.

Further it is seen that completely banning sales and, pricing the legitimate products very high may force price conscious consumers to seek cheaper alcohol through "informal" channels and turn to illicit products, which may be counterfeit and adulterated and bring extra health risks. Excessive regulations also run the risk of generating unintended and often negative consequences, such as driving consumers toward the informal (unregulated) market.

Tragedies in some Indian states where consumption of illicit liquor has led to deaths are unfortunate consequences of such myopic policies. Further liquor is a state subject in India and there is no unified effort within the country to address the issue. A common national alcohol policy could be a step towards this direction.

The alcohol industry on its part also has a major role to play in this regard. While communicating with their consumers, they need to ensure that they do not promote the consumption of alcohol by people who otherwise would not drink.

In addition to the local laws, Companies need to have voluntary sales and marketing standards helping people make informed decisions about alcohol consumption based on

accurate and balanced information.

The problem of alcohol abuse is not restricted to any one country or society. Across the globe stakeholders are engaged in finding ways to address the issue in a practical and sustainable manner. There would be great merit in joining hands and creating common platforms to share best practices, learn from each other's experiences; success and failures and create a knowledge pool to fight this common battle together.

At SABMiller, discouraging irresponsible drinking is one of the group's top sustainable development priorities. The company cares about the harmful effects of irresponsible alcohol consumption, engages stakeholders and works collectively with them to address irresponsible consumption.

The company believes that information provided to consumers about alcohol consumption and the potential harm that may result from its misuse and abuse should be accurate and balanced.

First and foremost, the group expects its employees to aspire to high levels of conduct in relation to alcohol consumption. It does not, through marketing/advertising, promote the consumption of alcohol by people who otherwise would not drink.

The company promotes responsible consumption through awareness programs, partnerships with community stakeholders, and working with governments to reinforce purchase and drinking age limits. In India also the company plans to roll out awareness drives in some key cities reaching out to general audience. The company supports the concept of a national alcohol policy to address among other things, all the above issues and hopes to play a role in helping design it by engaging the government, other stakeholders and other members of the industry.



CP.AS-065-2008

31/10/2008

WHO CONSULTATION ON WAYS OF REDUCING HARMFUL USE OF ALCOHOL

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

To identify the most effective measures/strategies to address alcohol-related harm it is important to:

- 1. Take into account both the health problems associated with alcohol misuse and the health and social benefits of moderate consumption;
- 2. Base them on all the evidence, particularly from, for example, Southern Europe where incidences of the dangerous consumption patterns which need to be reduced seem to be lowest (we must learn from their experience);
- 3. Recognize that drinking patterns, as opposed to total consumption, are the best indicator of the extent of alcohol related harm;
- 4. Examine the reasons behind people's different drinking patterns and define how these might be influenced.
- 5. Make all relevant stakeholders work together; the recently established EU alcohol and health Forum is a good example of this.

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

Measures to reduce the health problems related to alcohol consumption will be effective if:

- 1. They are based on the understanding that the problem which needs to be addressed is alcohol misuse as opposed to total alcohol consumption;
- 2. They target the right problem in the right context recognizing that the extent and nature of the problem differs significantly from one country to the next;
- 3. They are based on the evidence and designed for the long term;
- 4. They recognize the role of all stakeholders in addressing the problem.

The most common forms of dangerous and harmful drinking behaviours are:

- 1. Drinking and driving
- 2. Under age drinking
- 3. Binge drinking

- Irresponsible drinking during pregnancy
- Addiction
- Drinking in circumstances one should not (dangerous professions etc)
- Illicit alcohol

The targeted measures which most effectively address these drinking behaviours include:

- Effective enforcement of drink driving and purchasing age legislation
- Education and awareness campaigns for young people and parents
- Interventions from the medical profession
- Measures to encourage responsible serving
- Measures aimed at encouraging responsible consumption
- Enforcement measures to reduce illicit alcohol production and consumption

Measures which target total alcohol consumption (high taxation, limited distribution, warning labels) as opposed to the risky drinking behaviours outlined above will have a limited impact on alcohol misuse but rather penalize the vast majority of consumers who drink responsibly.

It must also be clearly recognised that many of the problems associated with alcohol misuse in a number of (particularly developing) countries stem from illicit alcohol production. The issue of illicit alcohol needs to be urgently addressed in these countries.

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

The European spirits industry strives to promote and maintain the highest standards of social responsibility. The industry condemns the irresponsible consumption of its products. It is working with governments and other stakeholders to reduce misuse and is keen to develop additional initiatives to reduce it further.

In December 2005, CEPS members signed up to their own Charter on Responsible Alcohol Consumption. In the Charter, the membership of CEPS undertakes to uphold a number of commitments, including:

- By 2010, 75% of all CEPS members advertising will carry responsible drinking messages
- CEPS members will fully comply with the EFRD's Common Standards on Commercial Communications
- More and better Retail Server Training Schemes and Drink Driving Campaigns
- The industry will work closely with stakeholders to help define what is meant by sensible drinking and communicate this information widely.

CEPS membership delivers an annual report (independently verified by KPMG) on implementation of the Charter which will evaluate progress made, identify and disseminate best practice and identify where improvements must be made. The third report on CEPS Charter implementation will be made available end November 2008.

On 28 October 2008, CEPS and the European Forum for Responsible Drinking also launched the responsibledrinking.eu online portal, to promote responsible drinking. It acts as a gateway to the growing number of national spirits industry backed sensible drinking websites (13 in the EU by end 2008), and provides basic information for consumers from countries where such websites do not exist.

ASSOBIRRA SUBMISSION TO THE WHO OCTOBER 2008

In providing your submission to this section, you may wish to pay particular attention to an integrated approach to protect at-risk populations, young people and those affected by harmful drinking by others, as well as to available evidence and best practices, taking into account different national, religious and cultural contexts, including national public health problems, needs and priorities, and differences in Member States' resources, capacities and capabilities.

REPRESENTATION

Please choose only one among the four first questions.

~~1) The official views of a WHO member state:~~

2) The official views of an organization: YES

Name of the organization / company: Associazione degli Industriali della Birra e del Malto

a. List types of organizations

~~i. Government Institution~~

~~ii. Intergovernmental Institution (IGO)~~

~~iii. Non-governmental Institution (NGO)~~

~~iv. Academia-Research~~

v. Private sector: Alcohol industry, trade and agriculture YES

~~vi. Private sector: Other NO~~

~~3) The views of an individual: NO~~

~~4) Other (please specify): NO~~

~~5) If you are not replying on behalf of a Member State or the alcohol industry, trade or agricultural sector, do you receive any funding or support from trade in alcoholic beverages?~~

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9) Is WHO given the permission to use the organization's logo in printed versions of the submission? YES

10) Please attach the logo: (File size is limited to 5MB.) xxxx

- **FULL CONTRIBUTION** (max. 2000 words)

In providing your contribution you may wish to focus on the following issues:

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

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

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

(1447 words)

The Associazione degli Industriali della Birra e del Malto (Italian Brewers and Malsters Trade Association), from here on called AssoBirra), is the voice of the Italian brewing and malting industry, representing approximately 95% of the Italian beer production and 75% of the beer consumed in Italy, made by 16 large breweries and more than 200 microbreweries.

AssoBirra and its brewing member companies are also committed to promoting responsible beer consumption and to being part of the solution with regard to tackling alcohol misuse.

Karl Mann noted in 2003 that, in research into alcohol, "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 has led to a dependence on measures that attempt to reduce overall consumption. In Nordic countries such measures have neither prevented strong (recorded and unrecorded) consumption growth nor reduced problems. Meanwhile the factors leading to the reductions in overall consumption in France, Italy, Spain and Portugal, which cannot be explained by the introduction of control measures, have not been well examined.

What are your views on effective strategies to reduce alcohol-related harm?

In our opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider fully the diversity of societies, cultures and traditions;
- Take into account the diversity of individual and collective contexts of those who abuse (risk factors) as well as the individual and collective contexts of those who consume without abusing (protective factors);
- Take account of the specificities of beer and other categories of alcoholic drinks;
- Recognise the importance of education and training;

- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Interventions for heavy drinkers and those at greater risk, particularly underage people;
- Educational tools for young people and families;
- Enforcement of existing national drink-driving / purchasing age legislation;
- Drink driving reduction strategies, particularly for young drivers and repeat offenders;
- Encouraging responsible serving in outlets.

On the other hand, measures which aim to reduce overall consumption:

- Have little effect on misusers;
- Compromise the pleasure of the millions who drink responsibly.

In Italy, parallel to the strong reduction of the overall per capita alcohol consumption, particularly over the last three decades (- 48 % from 1980 to 2007), we have seen worsening consumption patterns in some segments of the population/society: this seems to indicate that the reduction of the overall consumption has little or no effect on harmful drinking patterns and harm reduction.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

Alcohol-related problems derive not so much from alcohol as a substance *per se*, but rather from many other variables linked to the individual and collective contexts. These contexts change according to the cultures, the socio-economic conditions, the individual and collective lifestyles.

From a global perspective, we believe therefore that the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy.

Building on these fundamental beliefs on the most appropriate ways to tackle alcohol-related harm, in Italy the brewing sector therefore has experience in supporting, encouraging and developing concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

An interesting initiative in respect of involving all relevant stakeholders is the EU Alcohol and Health Forum, which is based on a positive, action-oriented, multi-sectorial, multi-stakeholder approach to addressing the problems associated with inappropriate alcohol consumption. The Forum aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm. That the European Commission and the EU Member States promote the multi-stakeholder approach as a way forward in addressing alcohol-related harm is an extremely promising, though challenging, gesture. By definition, all those stakeholders having signed the Forum's Charter endorse this approach.

We trust that such an approach as the Alcohol and Health Forum may be considered as a template for similar platforms at all different levels.

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

AssoBirra and its member companies have the issue of tackling alcohol misuse on the top of their agenda.

Concerning our possible contribution to the reduction of alcohol-related harm, concrete examples of the leading role we play in this matter, particularly in gathering the best practice and experiences from our members and stimulating new initiatives, include:-

- Submitting one commitment in relation to the issue of alcohol and pregnancy via our European umbrella federation (The Brewers of Europe) under the EU Alcohol and Health Forum (2007, 2008);
- Developing an Alcohol Policy, with guidelines shared and respected by all member companies about responsible marketing and commercial communication;
- Co-Funding the Osservatorio Permanente sui Giovani e l'Alcool, a well known, highly respected independent alcohol research body, established in 1991 to monitor and investigate alcohol consumption patterns and supply the scientific and national community with evidence based information about alcohol consumption and the alcohol-related problems of the Italian youth population. Its aim has always been to collect scientifically reliable information on the patterns of alcohol consumption and the alcohol related problems in the Italian youth population and to put it at disposal of the scientific and national community.

In 2007 AssoBirra launched a Global Program "*Guida tu la vita. Bevi responsabile*" [*"Drive your life. Drink responsibly"*], a series of interventions addressing themes such as alcohol and pregnancy, alcohol and driving, and alcohol and young people.

Equipping doctors and pregnant women in Italy with the information and guidance in relation to alcohol and pregnancy.

AssoBirra, through its umbrella European Association (The Brewers of Europe) is a committer to the EU's Alcohol and Health Forum, set up by the European Commission, with a commitment addressing alcohol and pregnancy in partnership with a prestigious scientific medical society, SIGO, the most representative association of medical professionals of the obstetric and gynecological sector in Italy. This activity obtained the approval of the Italian Government through its National Plan "Guadagnare Salute" ["Gain Health"] and its objective has been to inform and sensitize the target population on fetal alcohol-related syndromes (FAE, FAS, FASD) and on how to prevent them. The target audience was:

- Doctors specialized in gynecology and obstetrics (the primary and most authoritative source of information for women)
- Women of child-bearing age (who are planning a pregnancy or who have just become pregnant)

The key messages have been:

- Consuming alcohol during pregnancy increases the risk to the fetus of birth defects from alcohol
- No quantity of alcohol is safe during pregnancy
- Alcohol can damage the fetus starting from the first weeks of pregnancy
- The damage to the fetus from alcohol during pregnancy is permanent and not curable
- The damage from alcohol is completely preventable by not drinking during pregnancy
- A woman should abstain from consuming alcohol during the entire pregnancy
- A woman who has already consumed alcohol should be encouraged to stop
- A woman who is planning a pregnancy should abstain from consuming alcohol

5.000 obstetricians and gynecologists from SIGO received an information kit containing:

- An informational booklet dedicated to doctors, as well as a CD-ROM with more detailed scientific literature on the subject.
- A poster with an educational message targeting women, to post in places where doctors operate (doctor's surgeries, universities, hospitals etc.).

Furthermore, a minisite has been created with an area dedicated to doctors and an area specifically targeting women. An in-depth article has been published on fetal alcohol-related pathologies in the scientific journal of SIGO, "Gynaecology & Obstetrics."

The initiative has been given prominence via

- An institutional press conference.
- Targeted press office activities.

And furthermore

- Roberta Capua, a well-known TV anchorwoman (future mother in the eighth month of pregnancy) has taken on the message of the initiative in full, becoming official spokesperson of the campaign.

In the framework of our programme of Responsible Consumption "*Guida tu la vita. Bevi responsabile*" ["*Drive your life. Drink responsibly*"], AssoBirra has created and launched www.beviresponsabile.it ["drink responsibly"], a website targeting consumers and dedicated to the responsible consumption of alcoholic beverages: The site has a consumer-friendly approach. It contains useful information on consuming alcoholic beverages wisely and in moderation and presents the commitments and initiatives of the beer industry on this theme. It is the web portal where one finds the initiative and the partners of the programme "*Guida tu la vita. Bevi responsabile*".

On the site www.beviresponsabile.it ["drink responsibly"], young people are able to:

1. Upload and listen to the messages on Radio 105 via a link (see below)
2. Play "create your own designated driver" online, to encourage young adults to design ways in which they can rotate the role of designated driver
3. Participate on a blog
4. Obtain information on the difference between appropriate consumption and the abuse or misuse of alcohol as well as other facts such as:
 - The different concentrations of alcohol in various beverages
 - The effect on the body of drinking with and without eating
 - Limits on blood alcohol content when driving and the number of drinks necessary to reach them
 - Beer and food, nutritional information, and modes of consumption

Within the program "*Guida tu la vita. Bevi responsabile*" AssoBirra has also launched an initiative dedicated to the theme **young people and alcohol** in partnership with a very popular Radio channel (Radio 105) and its DJ's, that has put the young people at the center (because it asks them to conceive the messages). It employs their daily communication channels (the web, the radio) and utilizes innovative tools and communication codes in which young people can recognize themselves and find an identity (sms, blog, etc).

The objective has been to promote a model of responsible consumption of alcoholic beverages among young adults.

The strategy has been to encourage our target audience to speak, involving young people by inviting them to tell their own friends to “drink responsibly, by offering them “places” in which they can express themselves in their own language. This could create sympathy, empathetic attachment to the initiative, recognition and respect of identity. The top five winning messages make the young people the center of a campaign that will be disseminated via a set of communication materials (T-shirts, gadgets, etc.),

Scotch Whisky Association submission to WHO online consultation

Q1 What are your views on effective strategies to reduce alcohol-related harm?

The Scotch Whisky Association (SWA) has taken an interest in encouraging responsible consumption of alcohol for some 40 years. The Association is well placed to comment on strategies to tackle harmful use of alcohol for, although Scotch Whisky can be made only in Scotland, it is sold and enjoyed in some 200 countries around the world. We are therefore aware of the impact of strategies in different parts of the world.

The overwhelming majority of individuals who choose to drink do so because they enjoy it and because it is a sociable activity. They generally drink in an appropriate manner and not to excess. Their drinking is often directed by the culture in which they live.

As a result, efforts to tackle misuse need to be sympathetic to the culture of the market in which initiatives to address inappropriate and excessive drinking are developed.

Changing culture to reduce the acceptability of misuse or social misbehaviour takes time. There are no quick fixes. Those that advocate higher taxes or advertising restrictions appear often to be motivated by the desire to be seen to be doing something rather than seeking long term answers. Such 'solutions' may appear attractive by looking more straightforward than seeking to alter cultural acceptance of inappropriate drinking over time; with the greater investment that a long term cultural change strategy requires.

The industry's domestic market, the UK, applies one of the highest rates of duty to Scotch Whisky anywhere in the world. Taxes on other alcoholic drinks are also relatively high by international standards. This offers a real world trial of the theory put forward by some that high taxes are needed to reduce the harmful use of alcohol. The current high level of public concern at inappropriate and excessive drinking in the UK demonstrates clearly that high taxes are not a successful strategy for tackling misuse.

Evidence shows that those who are dissuaded from drinking are moderate consumers, whose consumption pattern may indeed provide health benefits. Those who drink more, particularly those with the highest alcohol consumption, will divert more of their expenditure to alcohol if taxes are high.

Supporters of high taxes also claim they wish to reduce consumption overall. This is an imprecise measure when considering tackling harm. It may have the virtue of being relatively easy to measure in Western European and North American markets, but it is not a measurement tool that will assist WHO or others to determine success in tackling misuse.

To tackle misuse, it is important to focus on patterns of consumption so that those who choose to drink do so in an appropriate way.

Q2 From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

Inappropriate restrictions, including high taxes encourage illicit production and generate wider criminal activity. Those that favour increased taxes and greater restrictions on advertising frequently fail to address cultural issues. As a result, by failing to adopt targeted measures directed at those who misuse alcohol most such

advocates are left with the only solution of more and more restriction. There needs to be a better understanding of what makes individuals drink to excess.

The UK offers a clear demonstration of the complexity and cultural sensitivities that need to be addressed in tackling harmful use of alcohol, and why there is deficiency in saying that higher taxes are the solution. Government published statistics show that although alcohol is more expensive in Scotland than in England, and availability is broadly the same, per capita consumption is higher in Scotland. As incomes in Scotland are generally lower than in England this puts even greater doubt on the claimed benefits of using price as a control mechanism for reducing alcohol-related harm.

In the USA there has been a successful campaign with college students called Social Norming. In essence this raises awareness with students of their levels of drinking and how that compares with their peers. The perception among students of drinking by peers is usually that their peers are consuming at much higher levels than is actually the case. Armed with this new knowledge of the 'norm', students appear to moderate their own drinking. Researchers in Scotland have begun to examine if this is a phenomenon that works solely because it is culturally resonant to the USA. That was their starting point. The researchers set out with the belief that social norming would not work in Scotland. To their surprise initial findings suggest that rather than being culturally sensitive this may be one mechanism for tackling misuse that is behavioural, and can thus be adopted elsewhere.

The social norms approach is about educating individuals, resulting in informed choices. Frequently it is claimed that education does not work as a means for tackling harmful use of alcohol. We would suggest that is because there has been less or indeed little research into the role and impact of education on addressing the target groups most at risk from misuse. Such research takes time, but given attitudes to alcohol have been developed over thousands of years, we need to be realistic that time requires to be invested.

Further evidence of the power of education comes from server training programmes in Scotland. The industry supports a legal requirement that everyone that serves alcohol should be properly trained in the law, and in how to refuse drinks to people who are underage or are intoxicated. During the roll out of the national Servewise programme for licensing trade staff in Scotland it has emerged that trained staff are not only better equipped to handle inappropriate drinking by others, but moderate their own consumption. This, to our mind, again supports the view that education is an appropriate tool for tackling misuse.

What is particularly important is Partnership. The SWA was a founding member of the Scottish Government Alcohol Industry Partnership (SGAIP). This has brought together over time a number of trade associations, producer companies, on and off premise trade retailers, and Government to develop and deliver a range of initiatives designed to change attitudes to alcohol misuse in Scotland.

One of the high profile initiatives from the Partnership has been a coming together of industry partners with health and voluntary sector stakeholders to deliver an Alcohol Awareness Week (AAW). Launched in October 2007 this sought to improve attitudes towards responsible drinking. It focused on improving the knowledge of drinkers about the amount of alcohol in their drinks, and the amount of alcohol in a standard serving. Evaluation of the campaign by the Government after the Week revealed that 56% of people unprompted and 72% prompted were aware of the campaign. This was vastly ahead of any health campaign previously run by the Government, which had expected campaign recall to be in single digits.

The prominence of the campaign demonstrates the power of Partnership. Industry, retailers, health professionals and Government took the lead, but were able to extend the reach of the message by involving and providing material to media, sports clubs, the military and a wide range of organisations, businesses and groups thereby ensuring several million opportunities to receive the message was delivered.

The second AAW has just been held. This developed the concept of consumption awareness to setting a challenge to consumers during the week by encouraging them to moderate their drinking. The reach of this year's campaign appears to have successfully built on the first AAW. In year one 2,789 unique visits were made to the AAW website. This year 7,139 unique users viewed the site.

This is a further challenge for those that claim greater regulation is preferable and more effective than education. Often the call for increased legislation is as a result of failures in the enforcement of existing laws. Thus the deficiency to be addressed by ever greater restrictions is not one of failure by industry self-regulation nor a failure of education, it is the failure of authorities to apply existing laws. Why further restrictions on alcohol should be more effective when existing powers are often not fully used is not clear.

The importance of cultural sensitivities has rightly been recognised by the WHO in its Resolution. This importance has been demonstrated clearly in one of the other initiatives emerging from the SGAIP. The Partnership is looking at a defined geographical area - the county of Fife - to investigate which interventions and resources applied at a community level work best, what is less effective and what lessons can be learned to utilise this information to tackle misuse elsewhere in Scotland and possibly beyond. It has already emerged at the project scoping phase that different solutions appear to work more effectively in different communities. Thus, cultural sensitivities need to be properly addressed locally if tackling harmful use of alcohol is to be properly dealt with.

There is also compelling evidence that the harms which arise from misuse of alcohol are more acute in poorer communities. It flows therefore that targeting efforts against misuse in such areas offers considerable economic and social advantages not available by diluting resources through unsophisticated whole population approaches that do not reach vulnerable groups effectively. Interventions by health professionals and other organisations offer the opportunity not only to encourage consumers to moderate their consumption but, by reducing the harm within these communities, could lead to increased economic productivity and thus less reliance and diversion of public funds in supporting such groups.

Q3 In what ways can your organisation contribute to reduce the harmful use of alcohol?

Scotch Whisky is sold all over the world. Around 90% of all companies involved in the industry are members of the SWA. A condition of membership is that they sign up to the Association's Code of Practice for the Responsible Marketing and Promotion of Scotch Whisky. The Code is mandatory on companies in the UK. It will shortly become mandatory across the whole of the EU, and it already is regarded as best practice guidance for Scotch Whisky marketing and promotion globally.

The Code is backed by a complaints panel, members of which are independent of the industry. A recent audit of implementation of the Code demonstrated both adherence to the word and spirit of the Code, but also a widespread embracing of the Code's principles into company activity.

By Code evolution, such as the increased geographic reach above, and regular auditing of its provisions the SWA can ensure responsible marketing of Scotch Whisky around the global.

Through our membership of regional and global spirits bodies such as CEPS, The European Spirits Organisation and the World Spirits Alliance we can ensure exchange and adoption of best practice in responsible marketing by producers.

We already provide support to companies in overseas countries which wish to introduce responsibility codes and other social aspects programmes. We are happy to continue to do so.

We sincerely hope that the cultural community project in Fife mentioned above will highlight effective strategies for tackling misuse that we can share with others in Scotland and more widely.

Our experience of working in Partnership with Government, health and voluntary sector stakeholders has paid dividends in breaking down perception barriers and has built relationships across these groups. By working together stakeholders can deliver more than the sum of their individual parts.



Full Contribution

The German Brewers Association is the voice of the German brewing industry and represents, through its federal brewing association members, approximately 75% of the German beer production. The German brewing industry provides directly and indirectly about 550.000 jobs and over 756 Million € beer tax income last year (2007).

We are committed to promoting responsible beer consumption and to being part of the solution with regard to tackling alcohol misuse.

What are your views on effective strategies to reduce alcohol-related harm?

To have a sustainable impact, effective strategies to reduce alcohol-related harm need to:

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the specificities of beer and other categories of alcoholic drinks;
- Recognise the importance of education and training;
- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Interventions for heavy drinkers and those at greater risk, particularly underage people;
- Educational tools for young people and families;
- Enforcement of existing national drink-driving / purchasing age legislation;
- Drink driving reduction strategies, particularly for repeat offenders;
- Encouraging responsible serving in outlets.

On the other hand, measures which aim to reduce overall consumption:

- Have little effect on misusers;
- Compromise the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to

harmful use of alcohol?

From a global perspective, we believe therefore that the most effective approach needs to reflect:

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy.

Building on these fundamental beliefs on the most appropriate ways to tackle alcohol-related harm, across Europe the brewing sector therefore has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

AN INTERESTING INITIATIVE IN RESPECT OF INVOLVING ALL RELEVANT STAKEHOLDERS IS THE EU ALCOHOL AND HEALTH FORUM, WHICH IS BASED ON A POSITIVE, ACTION-ORIENTED, MULTI-SECTORIAL, MULTI-STAKEHOLDER APPROACH TO ADDRESSING THE PROBLEMS ASSOCIATED WITH INAPPROPRIATE ALCOHOL CONSUMPTION. THE FORUM AIMS TO PROVIDE A COMMON PLATFORM FOR ALL INTERESTED STAKEHOLDERS AT EU LEVEL THAT PLEDGE TO STEP UP ACTIONS RELEVANT TO REDUCING ALCOHOL-RELATED HARM. THAT THE EUROPEAN COMMISSION AND THE EU MEMBER STATES PROMOTE THE MULTI-STAKEHOLDER APPROACH AS A WAY FORWARD IN ADDRESSING ALCOHOL-RELATED HARM IS AN EXTREMELY PROMISING, THOUGH CHALLENGING, GESTURE. BY DEFINITION, ALL THOSE STAKEHOLDERS HAVING SIGNED THE FORUM'S CHARTER ENDORSE THIS APPROACH.

WE TRUST THAT SUCH AN APPROACH AS THE ALCOHOL AND HEALTH FORUM MAY BE CONSIDERED AS A TEMPLATE FOR SIMILAR PLATFORMS AT ALL DIFFERENT LEVELS.

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

In relation to how the German Brewers Association itself can contribute to the reduction of alcohol-related harm, our members have the issue of tackling alcohol misuse on the top of their agenda. For example, in Germany the Youth Protection Act provides that beer should not be sold or served to individuals under 16. However, the German Brewers felt that, although the law was largely known by retailers and sellers, there was room for improvement, particularly where adults were the ones buying the drinks for the minors.

So specifically looking at this issue of the legal purchasing age, the German Brewers submitted a commitment to the Alcohol and Health Forum under The Brewers of Europe's umbrella. This relates to the provision of tools (logos, posters, leaflets, guidance documents, a website etc.) that recall the law under the Youth Protection Act.

This is just the initiative so far submitted as a commitment to the Alcohol and Health Forum and there are a number of other best practice initiatives that are, or have been, taking place.

Further concrete examples in addition to this commitment under the EU Alcohol and Health Forum include:

- Signing and committing, through our membership of The Brewers of Europe, to the EU Alcohol and Health Forum's Charter (2007 and ongoing);

- Signing and committing, through our activities against drinking and driving, to the European Road Safety Charter (2008);
- Developing and adopting a Code of Behaviour (Brewers' Code, 2007) as well as guidelines for responsible commercial communication (2003 and ongoing);
- Support of our members fight against alcohol abuse, providing material, expertise and personnel;
- Contributing to the Worldwide Brewing Alliance's (WBA) Global Social responsibility Initiatives and Drinking and Driving Reports.

Berlin, 31.10.2008



Full Contribution:

The German Advertising Council handles citizens' complaints regarding individual advertisements – including complaints about commercials for alcoholic drinks.

The Council, which is funded by 44 organisations allied in the German Advertising Federation (ZAW), develops and applies codes of conduct such as its code on advertising for alcoholic beverages. Member organisations include alcohol producers associations and alcohol importers, the whole media- and advertising agencies- sectors. The German Advertising Council first issued its Code of Conduct on Commercial Communication for Alcoholic Beverages in 1976. In 1986, the European Commission incorporated the Code into the EU 'Television Without Frontiers' directive. The scope of the Code was extended by resolution of the ZAW member associations to include teleshopping in 1998 and to means of all commercial communication in general in 2005, "media neutral approach".

What are your views on effective strategies to reduce alcohol-related harm?

Alcohol and alcohol abuse continue to be extremely topical subjects for discussion in our society today; it can be positioned between enjoyment and risk, between damnation and euphoria, between well-being and selfdestruction. The vast majority of persons in Germany consume alcoholic beverages responsibly without harming themselves or others. In this context the advertising industry is of the firm opinion that commercial communication is a fundamental and indispensable part of free and fair competition. Recognising that harmful consumption of alcoholic beverages can have serious consequences for the consumers, their families and friends, and for society as a whole, the advertising industry is fully aware of its responsibilities when promoting alcoholic beverages, takes them seriously and acts accordingly. Core element of the advertising industrie's actions is a well-functioning system of advertising self-regulation. This has been improved within the last decades and will be further developed in the future.

The European Unions commissioner Viviane Reeding stated in a speech on September 2nd 2007 in Liverpool that in the area of advertising self regulation has made enormous progress. She expressly said that therefore: "The increasing sense of responsibility of the industry could in my view lead to deregulation in the field of advertising".

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, we strongly believe that the most effective approach needs to reflect: the diversity of the social and cultural circumstances of the nations worldwide. A one-size-fits all approach can not be successful when trying to reduce alcohol-related harm worldwide. Each nation has to tailor their national approaches based on its

particular economic, social and cultural contexts. In particular with regard to the advertising and commercial communications for alcoholic beverages each measure has to be conducted within the context of the existing legal, cultural and social environment. There are different ways for each nation to achieve the optimal solution for its circumstances.

Never the less it is appropriate to exchange views and experiences on a broader level but a single global measure would be contra productive.

For the advertising sector we highly recommend to encourage the set up and the further developing of self regulatory systems as a global approach. Where advertising self regulation exists it works sufficiently as a prompt and effective way of preventing irresponsible commercial communication.

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

Core element of the advertising industries' actions in Germany is a well-functioning system of advertising self-regulation. This has been improved within the last decades and will be further developed in the future. Provision of advice and training for decision makers in the advertising industry is one tool to strengthen the effectiveness of self-regulation.

The German Advertising Council provides advice and training for advertising industry on the voluntary self-regulatory codes in the area of alcohol advertising. Two voluntary regulations are in the focus of the training: Firstly the various obligations to prevent commercial communication for alcoholic beverages from being misconstrued as promoting alcohol abuse or harmful consumption of alcoholic beverages. Secondly the regulations that prohibit commercial communication for alcohol beverages from being misconstrued as being addressed at minors. The training covers the scope of the self-regulatory provisions in practice and their significance for a responsible behaviour when promoting alcoholic beverages.

Berlin, den 31. 10. 2008

FULL CONTRIBUTION (max. 2000 words)

In providing your contribution you may wish to focus on the following issues:

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

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

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

(1642 words)

The Federation 'Belgian Brewers' is one of the oldest professional associations in the world and almost all Belgian breweries belong to it. Its most important task is to defend the general interests of the brewery sector in the economic, social and ethical spheres. The Federation acts as official spokesman of the brewers with regional, national, international and European authorities. The federation represents approximately 99,5 % of Belgian beer production. Belgian breweries generate directly and indirectly around 75.000 jobs and 352.000.000 € in taxes for our national government each year. Thus the Belgian brewing sector is an important sector in the Belgian economy. Thanks to the production and distribution of beer the sector contributed in 2007, up to no less than 2,11% of the BIP.

Belgium is the country of beer. With its widely varying landscape Belgium offers a unique range of beers having the most contrasting tastes and flavors. Nowhere else in the world you can find a larger choice of regional, authentic and colourful beers. Beer has always been deeply rooted in our Belgian culture and tradition and is more than just a drink. One has thirst-quenching beers and special beers. Furthermore, Belgian beer is a refreshing enjoyable beverage which brings pleasure and social interaction to many people. The vast majority of Belgian consumers drink responsibly and it is reassuring for those who do consume beer regularly to know that it can be part of an adult's healthy lifestyle, with the WHO also recognizing the health benefits associated with responsible, moderate consumption. Belgian brewers are committed to promoting responsible beer consumption and to being part of the solution with regard to tackling the alcohol misuse of the small percentage of Belgian citizens who drink excessively or inappropriately.

What are your views on effective strategies to reduce alcohol-related harm?

In the 'Belgian Brewers' 's opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm need to:

- ✓ be evidence based and practical;
- ✓ differentiate between alcohol consumption and alcohol misuse;
- ✓ distinguish between consumers and abusers;
- ✓ understand and target the problems;
- ✓ identify and classify the drivers of different, both positive and negative, drinking behaviours;
- ✓ consider fully the diversity of societies, cultures and traditions;
- ✓ take account of the fact that consumers are buying a drink, not just alcohol, and selecting their beverage (e.g. beer brand x) on the basis of numerous factors (including taste, occasion, culture, tradition, weather etc.), not just alcoholic strength;
- ✓ recognize the importance of education and training;
- ✓ encourage *responsible* behaviour;
- ✓ be designed for the long term;
- ✓ engage stakeholders through partnerships.

Thus, effective, targeted interventions may include:

- ✓ social interventions to reduce perceptions that heavy drinking is accepted and normal;
- ✓ health-sector preventive measures against hazardous and harmful alcohol consumption, such as screening and brief interventions;
- ✓ educational tools for young people and families;
- ✓ enforcement of existing national drink-driving legislation and tough sanctions that deter;
- ✓ enforcement of legal purchasing and drinking age legislation;
- ✓ drink driving reduction strategies, particularly for higher risk groups, such as repeat offenders and young drivers;
- ✓ encouraging responsible serving in outlets.

On the other hand, the 'Belgian Brewers' believes that measures which aim to reduce overall consumption:

- ✓ have little effect on misusers;
- ✓ compromise the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, the 'Belgian Brewers' believes therefore that the most effective approach needs to reflect:-

- ✓ the diversity of Member States, and not imply a one-size-fits all policy prescription;
- ✓ the need for Belgium to consider tailoring our national approaches based on what is feasible, effective and relevant to our particular economic, social and cultural contexts;
- ✓ the search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- ✓ a fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy;
- ✓ the WHO's six-point agenda for responding to challenges, wherein the third agenda point - strengthening health systems - can be acted upon through encouraging screening and brief interventions in the health-sector.

Building on these fundamental principles, on the most appropriate ways to tackle alcohol-related harm, across Europe the brewing sector has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

An interesting initiative in respect of involving all relevant stakeholders is the EU Alcohol and Health Forum, launched at the initiative of the European Commission, which is based on a positive, action-oriented, multi-sectorial, multi-stakeholder approach to addressing the problems associated with inappropriate alcohol consumption. The Forum aims to provide a common platform for all interested stakeholders at EU level that pledge to step up actions relevant to reducing alcohol-related harm. That the European Commission and the EU Member States promote the multi-stakeholder approach as a way forward in addressing alcohol-related harm is an extremely promising, though challenging, gesture. By definition, all those stakeholders having signed the Forum's Charter endorse this approach.

We trust that such an approach as the Alcohol and Health forum may be considered as a template for

similar platforms at all different levels.

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

The 'Belgian Brewers' have the issue of tackling alcohol misuse on the top of our agenda, a situation reflected in the fact that the brewers by means of our European association, The Brewers of Europe, is by far the number one committer to the EU's Alcohol and Health Forum, with over a third of commitments filed by October 2008 coming from the brewing sector - 25 from The Brewers of Europe (and its national associations) and 11 from brewing companies.

In relation to how the Belgian Brewers itself can contribute to the reduction of alcohol-related harm, concrete examples of the leading role we play in this matter, particularly in facilitating the sharing of best practice and experiences and stimulating new initiatives, include:

- ✓ Taking steps to promote legal purchasing ages. We have called it 'Respect 16'. It is a sensitization campaign for respecting the minimum age of 16 for the consumption of beer. The campaign was launched in May 2008 by means of posters and flyers in bars all over Belgium and addresses at a first stage especially the hotel and catering industry sector, where 16 is considered as the legal age to drinking beer. At the same time we also address those persons that can be faced with the question for beer from young people under the age of 16. Who respects this age limit, shows simply respect for persons that are too young to consume beer/alcohol. By means of our campaign we provide those people with information/documentation how to manage not to sell beer to people under the legal drinking age (= 16). See <http://www.respect16.be>
- ✓ Discouraging drink-driving – our national Bob-campaign (that we already support financially and administratively since 1995); see www.bob.be
- ✓ Establishing working mechanisms to see to it that commercial communications do not encourage inappropriate drinking behaviours, and that the self-regulatory mechanisms are put in place for consumers to complain if they feel the local advertising codes are being broken. In Belgium, on May 12, 2005 the 'Belgian Brewers', the 'Belgian Wine and Spirits Confederation', the Federation of the wholesalers (Fedis)' and all Hotel and Catering Federations have signed together with the Minister of Health, Rudy Demotte, and the Consumerorganisations Crioc and Test Achats, the Covenant on practice and advertising for alcoholic beverages. The Covenant is applicable starting from May 20, 2005 and replaces the former autodisciplinary code of conduct of the Arnoldus Group (= *Brewers*). The Covenant is the proof that all professional organizations representing the interest of the beer sector and the sector of the alcoholic beverages have accepted their social responsibilities. Together with the authorities one has adopted an efficient self-regulation that has to be applied by each producer and includes sanctions and that protects all consumers and especially the young ones in an efficient way. The form and the field of application of this covenant are unique and are more effective than a classic legal frame.

An important feature of these commitments is the number and diversity of partnerships with other stakeholders who also wish to support, finance and associate themselves with these commitments. Examples of partners are:

- ✓ National governments (for *the Covenant on practice and advertising for alcoholic beverages*);
- ✓ Local and regional authorities;

- ✓ Road safety authorities (*IBSR – Institut Belge pour la Sécurité Routière*, for the Bob-campaigns);
- ✓ Police Authorities (for *the Bob-campaigns*);
- ✓ Consumer Groups (for *the Covenant on practice and advertising for alcoholic beverages*);
- ✓ Self-regulatory organizations (le ‘Jury d’Ehique Publicitaire’ for *the Covenant on practice and advertising for alcoholic beverages*);
- ✓ Other alcoholic drinks producers (for *the Covenant on practice and advertising for alcoholic beverages*);
- ✓ Horeca, Retailers and Distributors (for *the Covenant on practice and advertising for alcoholic beverages and the Respect 16 – campaign*);
- ✓ Media Broadcasters (for *the Covenant on practice and advertising for alcoholic beverages*);
- ✓ Advertising Agencies (for *the Covenant on practice and advertising for alcoholic beverages*).

In an effort to identify what is best practice, Belgian Brewers has also committed to seeing to it that the implementation of these commitments is monitored and evaluated.

If the EU’s strategy to support Member States in reducing alcohol-related harm and the Alcohol and Health Forum remain focused on nurturing best practice initiatives that, on the local level, target alcohol misuse where it occurs, then the ‘Belgian Brewers’ and its members remain committed to developing and further improving these campaigns.

WORLD HEALTH ORGANISATION **ON-LINE CONSULTATION ON ALCOHOL**

SUBMISSION BY PERNOD RICARD S.A.

Pernod Ricard S.A. is a global leader in the production, marketing, distribution and sales of distilled spirits and wines. Headquartered in Paris, Pernod Ricard produces its beverages around the world, from Australia to California, and from India to Sweden.

As a company, Pernod Ricard has a long history of corporate social responsibility activity, especially when it comes to Sustainable Development. Whether in the field of environmental protection or in the promotion of responsible drinking, Pernod Ricard takes its responsibilities as a corporate citizen very seriously. As a company, we continue to operate on old family values while keeping our business focus firmly fixed on the long-term future of the drinks business.

It is therefore not in the interests of Pernod Ricard to promote inappropriate drinking behaviour or to service those drinkers who are disposed to drinking excessively. In promoting the responsible consumption of our brands, our objective is to provide consumers with beverages that they can enjoy in a spirit of moderation and conviviality. This goal is shared by our shareholders and employees. Our business can only be sustainable over the long-term if we and the rest of the drinks industry take care to mitigate the potentially negative social consequences linked to alcohol abuse.

Over the past 10 years, Pernod Ricard has experienced significant growth in its business operations, primarily through acquisitions. Both our CEO, Patrick Ricard, and our Managing Director, Pierre Pringuet, share this belief in the responsible enjoyment of our beverages and they actively communicate this belief to our business operations. As our company has grown, so have our activities in the corporate social responsibility area. Pernod Ricard have now initiated or partnered with other organisations in a variety of programmes around the world to promote a better understanding of alcoholic beverages and how they should be consumed. We look forward to exploring new initiatives with other interested stakeholders to promote and reinforce informed and intelligent attitudes towards the consumption of alcoholic beverages.

For its consultation, the WHO has posed three questions. Pernod Ricard offers the following responses.

Effective Strategies to reduce alcohol-related harm

Pernod Ricard believes that most adults who drink consume alcoholic beverages in moderation. Most alcohol-related harm is associated with high-risk drinking

behaviour (excessive drinking, drinking prior to driving or during pregnancy, underage drinking, etc.). We believe that studying these various patterns of drinking will prove to be a better predictor of alcohol related harm rather than concentrating on overall alcohol consumption. Pernod Ricard would, therefore, suggest that the WHO focus its attentions on understanding these patterns of alcohol consumption and address future alcohol policies towards those consumers engaging in these risky drinking patterns.

It is equally important for the WHO to consider the national and local drinking patterns and cultures in devising alcohol policy. Ultimately, the member states will be responsible for implementing the alcohol strategy. Any strategy must consider these local drinking patterns and tailor the specific alcohol programmes to local conditions. This includes understanding not only how the local population are drinking, but also what types of alcoholic beverages are being consumed.

In implementing a strategy to reduce alcohol related harm, it is also important that the strategy seek the input and participation of all stakeholders in the effort. These include not only the Health Ministry and the public health sector, which should advise and inform consumers on the health aspects – and risks - of alcohol consumption, but also justice and law enforcement officials, who may be called to deal with anti-social or violent behaviour, the drinks industry, including producers and retailers, who can reinforce responsible drinking message through their communications with consumers, and others in civil society who are involved with alcohol harm reduction, e.g., NGOs, local social workers, etc. The law enforcement officials could also act to deter and eliminate illicit production and distribution of alcohol products, since such “beverages” could very well present a health risk on the potability of the beverage.

Changing consumption patterns of alcoholic beverages will take time, investment and commitment. In many member states, we need to work together to improve consumers’ awareness and understanding of what alcohol is and how it affects the human body. Ultimately, the consumption of alcoholic beverages is an individual choice. Our objective should be to provide consumers with appropriate information on alcohol and its consumption so that consumers can make informed drinking decisions. Pernod Ricard is not persuaded that seeking to reduce overall alcohol consumption through higher taxes and restricting availability will prove successful. There are too many lessons from around the world where such measures only encourage illicit alcohol production and the smuggling trade.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

The first point that should be understood is that a global perspective should not lead the WHO to a single strategy for all member states. Each member state will require the flexibility to develop its national strategy on alcohol taking into consideration the local attitudes towards alcohol consumption, the local drinking cultures, and what types of alcoholic beverages are consumed by the national population. As mentioned above, understanding the local drinking patterns and then targeting the identified harmful drinking behaviours will be a more effective course of action rather than adopting a one-size-fits-all policy that does not make allowances for local conditions.

The WHO should also consider working with their member states to increase the enforcement of alcohol production regulations and the prevention of illicit alcohol production. Illicit alcohol production in many developing countries has led and continues to lead to the problem of consumers imbibing dangerous beverages that can lead to serious injury or death. Such products are often beyond the control of government regulators. This must change in order to protect the health of the general population.

Pernod Ricard believes in the importance and usefulness of educating consumers on alcohol, the amount of alcohol contained in their preferred drink and what the health implications are for such consumption. While some commentators have dismissed the usefulness of education, Pernod Ricard believes it imperative that consumers understand what they are drinking so that they can make informed drinking decisions.

We would also recommend that the WHO consider employing the social norms approach. This initiative has been developed in the US, but could prove useful in other countries in seeking to educate young people about their drinking levels and their drinking behaviour. Social norming measures the levels of young people drinking and then compares these levels to their perception of how much their peers drink (since most young people hugely over-estimate how much they think is normal among their peers). In raising awareness of their own drinking levels and those of their peers, the social norming project appears to have a moderating influence on the drinking habits of young people. It is a new development that should be considered.

In what ways can your organisation contribute to reduce harmful use of alcohol?

As already mentioned above, Pernod Ricard has already initiated a number of programmes in a number of member states to promote responsible drinking and to underscore the point of individual responsibility for one's drinking behaviour.

In the area of drink-drive, Pernod Ricard has built on its initial work in France in working with the French Ministry of Transport to promote a designated-driver scheme as part of our commitment to the French Road Safety Charter and to provide electronic breathalyzers in night clubs. Pernod Ricard now operates anti-drink-driving programmes in a number of countries, including China, Singapore, Mexico, Australia, New Zealand, Korea and Venezuela. We became a signatory to the European Road Safety Charter in 2007 and, working through the International Center for Alcohol Policies, we also work with the Global Road Safety Partnership.

With regards to young people, Pernod Ricard has an internal approval process for its brand advertising and other branded commercial communications. One key element in our code of conduct is that our advertising and promotion activities will not target young people under the legal drinking/purchase age. This is a commitment which we follow both internally and within our industry organisations and with our industry and/or government regulators. Compliance with our internal code is reported each year in our corporate annual report, including examples of commercial communications that have been rejected or modified.

Pernod Ricard also believes it is important to engage with parents, teachers and other opinion-formers who will have an influence on the behaviour of young people, and, by so doing, to challenge them on the messages being conveyed to young people on appropriate alcohol consumption. Our “Accept Responsibility” campaign in the US and the UK is a case in point. Since the prime influencers on young people are their parents and their peers, parents and others should know that there are tools and talking points which can be used to have an intelligent discussion, if they so choose, with their children on alcohol.

Pernod Ricard is a strong supporter of industry and company activities to educate young people above the legal drinking age to understand their alcohol consumption and to reinforce the message promoting responsible drinking. In Ireland, the industry organisation MEAS (Mature Enjoyment of Alcohol in Society) has a campaign entitled “Had Enough?” which seeks to stigmatize drunken and anti-social behaviour and to illustrate to young people in Ireland that drunkenness is not attractive. In Thailand, our “Responsibility Ambassadors” encourage responsible drinking at promotional events.

Pernod Ricard made the decision in 2006 that all of its brand advertising would carry a responsible drinking message for its consumers. This message seeks to remind consumers that in enjoying our brand of spirits or wine, they should do so responsibly and moderately. It serves as a gentle reminder that an individual's drinking is a personal choice and, thereby, within their own control.

Within Pernod Ricard, the issue of drinking during pregnancy is taken seriously. We believe that women who are pregnant or those women who are considering pregnancy should refrain from drinking alcoholic beverages. Following this position, Pernod Ricard took the decision in 2006 to place the pregnancy logo which was mandated in France on the packaging of all of our brands in Europe. This logo now appears on our back labels in all of the EU member states. This logo serves as a reminder to consumer to reinforce the message on drinking during pregnancy. While there is a high level of awareness on the risks of drinking during pregnancy, this knowledge base is not consistent across Europe. While Pernod Ricard believes that the prime source of information on the risks of alcohol consumption during pregnancy lies with a woman's doctor and the health profession in general, the pregnancy logo is one way that we, as a producer, can reinforce the message and provide consumers with a reminder on this issue.

As mentioned above, the problem of illicit production and the trade of illicit alcohol is a growing issue internationally. Pernod Ricard, working with other spirits producers, supports the International Federation of Spirits Producers (IFSP). While the central purpose of this organisation is to protect the integrity of our companies brands, the IFSP seeks to engage with law enforcement officials within member states to enforce the local laws and to investigate and eliminate the production and distribution of illicit alcohol products that are illegally produced and, thereby, avoiding government regulation and taxation. Such products can pose a very real health hazard that could cause injury or death to unsuspecting consumers.

The programmes and initiatives mentioned above offer a general overview of the work that Pernod Ricard is already doing in the promotion of responsible drinking. No doubt there will be opportunities for our company to expand on these projects and to develop new programmes in other markets. We at Pernod Ricard stand ready to work with other interested stakeholders in developing new initiatives to promote responsible and intelligent drinking decisions.

October 30, 2008

Dr. Benedetto Saraceno
Director, Department of Mental Health and Substance Abuse
World Health Organization
Avenue Appia 20
1211 Geneva 27
Switzerland

Dear Dr. Saraceno:

I am writing to you and your committee as the World Health Organization (WHO) prepares to consider a global strategy to combat the harmful use of alcohol. I respectfully caution you and the WHO to remember the vast difference in alcohol practices between countries; the diverse institutional structures for regulating alcohol beverage manufacturing, distribution, sales, and consumption; and the particular historical dynamics by which national drinking cultures and regulation have evolved. Different countries and cultures have varied alcoholic beverage traditions and problems with abuse. They have created diverse methods of response and intervention through regulation and behavior modification.

The WHO should not attempt to create a single, one-size-fits-all approach to alcoholic beverage regulation. Such a uniform policy, national Prohibition, failed when it was implemented in the United States from the end of World War One to 1933. The United States, as a consequence of that lesson, now regulates the distribution and sale of alcoholic beverages primarily at the state level, so that the law will reflect local norms and practices and will not fail to produce desired control through being either too lax or too stringent.

The experience of the United States thus serves as a contrast to a Utopian quest for a single universal solution to the problem of the harmful use of alcohol. There is no one answer. The experience of the United States does suggest that an approach generally followed in all of the states merits serious consideration from the WHO. This is what is often called the three-tier system, designed to establish a transparent and accountable system of distribution and sale. This system was established following the repeal of Prohibition by the 21st Amendment and progressively improved with the addition of more refined and detailed restrictions to counter efforts by suppliers, wholesalers, or retailers to evade its strictures. The three-tier system was intended, among other things, to curtail the practice of the tied house, which tied a retail seller to a particular producer. Tied houses,

it was believed, had contributed to excessive competition, inappropriate over-selling, and thus excessive consumption and abuse of alcohol.

A recent court case in the state of Louisiana succinctly summarized the rationale behind the three-tier system and how its prevention of vertical integration fostered public health goals:

“Without the three-tier system, the natural tendency historically has been for the supplier tier to integrate vertically. With vertical integration, a supplier takes control of the manufacture, distribution, and retailing of alcoholic beverages, from top to bottom. The result is that individual retail establishments become tied to a particular supplier. When so tied, the retailer takes its orders from the supplier who controls it, including naturally the supplier’s mandate to maximize sales. A further consequence is a suppression of competition as the retailer favors the particular brands of the supplier to which the retailer is tied to the exclusion of the other suppliers’ brands. With vertical integration, there are also practical implications for the power of regulators. A vertically integrated enterprise – comprising manufacture, distribution, and retailing – is inevitably a powerful entity managed and controlled from afar by non-residents. The three-tier system was implemented to counteract all these tendencies. Under the three-tier system, the industry is divided into three tiers, each with its own service focus. No one tier controls another. Further, individual firms do not grow so powerful in practice that they can out-muscle regulators. In addition, because of the very nature of their operations, firms in the wholesaling tier and the retailing tier have a local presence, which makes them more amenable to regulation and naturally keeps them accountable. Further, by separating the tiers, competition, a diversity of products, and availability of products are enhanced as the economic incentives are removed that encourage wholesalers and retailers to favor the products of a particular supplier (to which wholesaler or retailer might be tied) to the exclusion of products from other suppliers.”

Manuel v State of Louisiana, 2008 WL 1902437 (April 30, 2008 La. App. 3 Cir.)

This view was first set out by Fosdick and Scott, in *Toward Liquor Control*, a book commissioned by John D. Rockefeller, Jr. to help states plan for the post-repeal world.¹ This work, the product of cooperative research into alcoholic beverage control in Europe, Canada, and the United States, was influential in guiding the creation of post-repeal state-based alcoholic beverage regulation. They wrote:

“The ‘tied house’ systems had all of the vices of absentee ownership. The manufacturer knew nothing and cared nothing about the community. All he wanted was increased sales. He saw none of the abuses, and as a non-resident, he was beyond local social influence. The ‘tied house’ system also involved a multiplicity of outlets, because each manufacturer had to have a sales agency in a given locality.”

It is worth noting, to return to my earlier comments, that Fosdick and Scott specifically refrained from offering a model law for the states. They knew that one size does not fit all. They made recommendations, offered alternatives, but left elaboration of specific legal regimes to be worked out by individual states.

In addition to the work of Fosdick and Scott, I recommend to the attention of you and your committee *Alcohol, No Ordinary Commodity* and *Social Economic Control of Alcohol: The 21st Amendment in the 21st Century* which also address the issues related to alcohol regulation by the states.ⁱⁱ

The answer to the problems of tied houses and inadequate regulation for the creators of post-Prohibition repeal regulation was to establish a comprehensive system of control to punish misbehavior and also to reduce temptations and pressures to misbehavior on drinkers, as well as on retailers, distributors, and manufacturers. Strict licensing on anyone connected with the industry, so that none might feel unfairly and disproportionately over-regulated, was part of the program. The pressures any tier might place on another to oversell were restricted. Distributors, who are required to be physically present with the state in which they are licensed, serve as a critical point at which the state, to the extent it wishes, can control price and marketing, enforce prohibitions against contraband, maintain an orderly market, and effectively collect taxes.

Concisely stated, the intent of post-repeal alcohol regulation was to promote moderation in consumption in part by promoting moderation in selling by mitigating the excesses of an unrestrained pursuit of profit. All this was to be achieved by moderation in law-making. Prices were to be sufficiently high and availability sufficiently constrained to prevent an over-stimulation of demand. Conversely, prices were not to be so high nor availability so constricted as to stimulate illicit, and therefore unregulated, manufacture, distribution, or sale. Under this system, interbrand competition, within a regulated marketplace has occurred.

Alcoholic beverage control remains an important issue for American lawmakers and the American public. It is no longer, however, the single issue dominating political debate as it was from soon after our Civil War to 1933. The problems with alcohol in the United States remain important, yet are more chronic and less acute. This is testament to the general success of the American systems of alcoholic beverage control. In the United States, intoxication rates, incidence of first intoxication before age 13, the percentage of those consuming 3 or more drinks at one sitting, and the incidence of youth drinking are all significantly lower than they are in European nations.ⁱⁱⁱ The American system satisfies the American people and appears to offer some guidelines to Europe and the rest of the world as well.^{iv}

Finally, I would like to share more information about our membership. The National Beer Wholesalers Association (NBWA) represents the interests of the 2,750 licensed beer distributors in the United States. None of our membership is a publically traded corporation. Each is a locally owned, independent business distributing local, national, and global brands. They are the route to local American markets for Belgian, American, Mexican, German, Chinese, and other beers. They work with, not for, domestic and foreign breweries and live in the communities where they sell beer to state licensed retail accounts. Beer distributors are very concerned about the misuse of alcohol and believe the American state-based system works well to address this issue.

My organization stands ready to assist the WHO in its deliberations. Please do not hesitate to contact me and enlist the assistance of my organization as you develop your final report. We would be willing to testify or submit additional material if it would help the WHO in formulating policy.

Thank you for your kind consideration.

Sincerely,

Paul E. Pisano
Senior Vice President and Counsel

ⁱ Fosdick and Scott, *Toward Liquor Control* at 43 (Hansen & Bros. Publishers 1st Ed. 1933).

ⁱⁱ *Alcohol: No Ordinary Commodity*. T Babor et al. Oxford University Press 2003/ *Social and Economic Control of Alcohol*, Jurkiewicz and Painter, CRC Press 2008

ⁱⁱⁱ Hibell, B., Andersson, B., Bjarnason, T., Ahlstrom, S., Balakireva, O., Kokkevi, A., & Morgan, M. (2004). The ESPAD report 2003: Alcohol and other drug use among students in 35 European countries. Stockholm: Swedish Council for Information on Alcohol and Other Drugs. See also; Johnston, L. D., O'Malley, P. M., Bachman, J. G., & Schulenberg, J. E. (2004). Monitoring the Future national survey results on drug use, 1975-2003. Volume I: Secondary school students (NIH Publication No. 04-5507). Bethesda, MD: National Institute on Drug Abuse.

^{iv} www.centerforalcoholpolicy.org

PREVENTION AND CONTROL OF HARMFUL CONSUMPTION OF ALCOHOL IN ARGENTINA

Bodegas de Argentina A.C., the national trade association of the Argentina Wine Industry presents these comments in response to the WHO Resolution on Strategies To Reduce the Harmful Use of Alcohol.

Bodegas de Argentina, independently and in coordination with our national, provincial, and local authorities, has actively pursued programs to reduce the harmful use of alcohol in Argentina. We have learned that the issue of reducing harmful use of alcohol is complex and requires different solutions in different circumstances. We understand that any programs related to reduction of harmful alcohol use must be locally focused, culturally based and cost effective. We in Argentina have been most effective when all stakeholders work with our governmental authorities to design and implement responsibility programs. The best example of this is NATIONAL LAW N° 24.778.

For the past decade, since 1997, NATIONAL LAW N° 24.778. has been the primary means for all stakeholders to focus on the prevention of alcoholism. The Argentine wine industry has worked closely with the government to support the law and its goals of regulating at-risk alcohol consumption, alcohol production, availability and distribution of alcohol, as well as prevention of harmful use. Main aspects of this law include:

- A prohibition of selling alcohol to people under 18.
- A declaration of national interest to fight against the excessive alcohol consumption.
- A prohibition of the consumption of alcoholic beverages in the street and in inside places when there are sports, educational, cultural and artistic activities going on.
- A requirement that all alcohol beverages and advertising include the message "Drink moderately. Banned the selling to people under 18" (translated from Spanish).
- A prohibition on publicity/advertising that is addressed to people under 18 and shows teenagers drinking, and where it suggests improvement in physical and intellectual performance. There is a further prohibition on holding events where the drinking of alcoholic beverages is required other than a tasting for the quality of the products.

- The law includes a national program for the prevention and the fight against excessive alcohol consumption.
- The law provides strict alcohol limits for driving any kind of vehicle.
- The law establishes the appropriate sanctions for violations.

In addition to the national legislation, in the main provinces, like Buenos Aires, there is a registry for shops that sell alcoholic beverages (REBA), which gives licences to sell alcoholic beverages. Law N° 13.178 www.sada.gba.gov.ar. In all the provinces and municipalities there are rules that forbid the selling of alcoholic beverages from 10:00 PM to 07:00 AM. There is an exception in restaurants, clubs or other places where the alcohol consumption is inside these places. In the provinces and municipalities there are strict alcoholic controls for drivers especially during weekends and holidays.

HELP AND PREVENTION ORGANIZATIONS

In Argentina, there are a lot of alcohol help and prevention institutions like:

Alcohólicos anónimos - www.aa.org-ar

Consejo Argentino del Alcoholismo - www.cadaweb.org.ar

PRODUCTION CONTROL

In Argentina, there are two national organizations which belong to the State that control the production and commercialization of alcoholic beverages. For distilled spirits and beer, the Instituto Nacional de Alimentos. For wine, the Instituto Nacional de Vitivinicultura, that controls the entire chain from the vine to the consumers based on the traceability of the process.

While NATIONAL LAW N° 24.778 has successfully set the basis for reducing harmful use of alcohol, the Argentine Wine Industry is considering other self regulatory approaches to the issue. As part of this effort we will be working with the Corporación Vitivinícola Argentina, the group that has been established to develop a Strategic Plan for Argentina Vitivinícola.

Thank you for the opportunity to provide comments.

Nuestra posición sobre el consumo de bebidas alcohólicas

Alcohol y Salud

Nuestra cerveza es un valor agregado para el disfrute de la vida de la mayoría de nuestros consumidores. Además de brindar satisfacción a nivel social, el alcohol puede brindar beneficios para la salud física de algunas personas, siempre que se consuma responsablemente. Por otra parte, el alcohol se asocia con ciertas enfermedades, condiciones de salud y consecuencias sociales negativas, particularmente, cuando el consumo de alcohol es excesivo o irresponsable. Aunque reconocemos que finalmente nuestros consumidores son responsables de sus propios hábitos de bebida, nuestra publicidad no presentará el rechazo, la abstinencia o el consumo moderado como aspectos negativos, ni tampoco podrá sugerir que el alcohol tiene propiedades curativas, ni mostrará mujeres embarazadas, o estará dirigida a menores de edad.

Backus: nuestra estrategia

En Backus hemos incluido como parte de nuestro modelo de gestión el Desarrollo Sostenible, que es uno de los 5 pilares que dan orientación a nuestros planes estratégicos. Nuestro marco de desarrollo sostenible incluye 10 prioridades que recogen por una parte, las prioridades globales y por otra, las referidas a nuestro negocio, dentro de éstas últimas se encuentra nuestra primera prioridad “Desalentar el consumo irresponsable de bebidas alcohólicas”.

Backus es una empresa que elabora con responsabilidad cada uno de sus productos y se encuentra orgullosa del rol que los mismos juegan en la vida de las personas y en las celebraciones sociales. Sin embargo, como lo mencionamos anteriormente, también es conciente que el consumo irresponsable de bebidas alcohólicas puede tener como resultado consecuencias negativas a nivel personal, social o de salud.

En consecuencia y como empresa líder a nivel nacional, nos hemos propuesto de manera pro-activa, fomentar entre el público una cultura de Consumo Responsable y combatir el abuso y mal uso de las bebidas alcohólicas a través de un programa que mantendrá continuidad en el tiempo

Estrategias y lineamientos para combatir el consumo excesivo y nocivo del alcohol:

- Liderando la autorregulación.
- Identificado a nuestros principales stakeholders relacionados.
- Involucrando diversos actores de la sociedad: consumidores, trabajadores, gobierno, instituciones civiles, entre otros, iniciativas descritas en las preguntas anteriores.
- Mediante iniciativas de largo plazo.

Iniciativas, acciones y programas implementados para reducir el consumo excesivo y nocivo de alcohol:

En Backus, desde el año 2006 implementamos nuestro Programa de Consumo Responsable. El objetivo general del programa es promover el consumo responsable de bebidas alcohólicas en mayores de edad que hayan tomado la decisión de consumirlas.

Los objetivos específicos son:

- o Sensibilizar a la población en relación al consumo responsable de bebidas alcohólicas, alertándolos sobre los riesgos del consumo excesivo.
- o Educar sobre un consumo responsable y sobre cómo auto regularse.
- o Colaborar con la eliminación de la venta de bebidas alcohólicas a menores de edad.
- o Promover acciones responsables de las autoridades, en cuanto a la prevención y control del consumo responsable.

- Promover que la industria de bebidas alcohólicas comercialice sus productos de manera responsable.
- Construir una reputación favorable para la empresa asociando el mensaje de Consumo Responsable a Backus.

Nuestro grupo objetivo es jóvenes de 18 a 29 años de todos los niveles socio económicos, puntos de venta, padres, docentes, adultos mayores de 30 años y líderes de opinión.

Este programa se ha venido implementando por etapas:

- Primera etapa: Políticas y lineamientos internos

Definimos y difundimos a todos los miembros de la organización y a las agencias de publicidad, comunicaciones y medios nuestro “Manifiesto sobre el alcohol” y un estricto “Código de Comunicación Comercial”. Estos documentos establecen la posición de Backus en relación al consumo de bebidas alcohólicas, la comercialización responsable de sus productos y a la comunicación comercial. Se conformó un Comité Interno de Cumplimiento (CIC), que evalúa todas las comunicaciones comerciales y publicitarias con el fin de que éstas estén alineadas con la letra y el espíritu del Código. El CIC viene funcionando en forma continua y sin contratiempos.

- Segunda etapa: Compromiso público

Asegurado el compromiso de toda la organización pasamos a la segunda etapa que significó difundir nuestro compromiso y someternos a escrutinio público. Es así que promovimos y firmamos en Junio del 2007 el “Código de Autorregulación de la Comunicación Comercial” el cual fue también suscrito por el Consejo Regulador de la Denominación de Origen Pisco. El cumplimiento de este código es supervisado por el Consejo de Autorregulación Publicitaria (CONAR), que ha establecido un procedimiento de quejas y el colectivo FEMTV que actúa como veedor.

Asimismo, decidimos incorporar en todas nuestras comunicaciones comerciales el mensaje “Tomar bebidas alcohólicas en exceso es dañino” y entregar de manera gratuita a nuestros socios, los puntos de venta, un afiche de 30 x 40 con los mensajes: “Prohibida la venta a menores de 18 años” y “Si has ingerido bebidas alcohólicas no manejes”. También, decidimos participar de manera activa en la comisión encargada de la redacción del reglamento de la ley 28681 “Ley que Regula la Comercialización, Consumo y Publicidad de Bebidas alcohólicas.”y estamos promoviendo su publicación.

- Tercera etapa: Trabajando con docentes y padres de familia

En la tercera etapa, durante el 2007, realizamos con la Asociación ACEPTA, acciones puntuales dirigidas a docentes y padres enfocadas en la prevención del consumo de bebidas alcohólicas de menores de edad. Auspiciamos el curso “Docentes como agentes preventivos”, dirigido a 400 maestros de escuelas de Lima y contribuimos con la reedición de 12 mil folletos informativos dirigidos a padres de familia y distribuidos de manera gratuita. Estos folletos pueden ser descargados de manera gratuita de la web del programa educativo Escuela Virtual Backus (www.escuelavirtualbackus.edu.pe)

- Cuarta etapa: Campaña Ponte Un límite

Lanzada en Octubre del 2007, desarrollamos una primera campaña de comunicación masiva dirigida a desalentar el consumo excesivo de los adultos jóvenes y promover la autorregulación en el consumo de bebidas alcohólicas, advirtiendo sobre los riesgos y peligros a los que puede conducir el consumo excesivo.

El concepto de la campaña se traduce en la siguiente propuesta: Está en ti el tomar conciencia y no exponerte al peligro que el beber en exceso puede traer consigo. Por eso, ponte un límite. La campaña incluyó el uso de medios de comunicación masiva (televisión de señal abierta y cable, radio, paneles, prensa, folletería), además de planes de comunicación interna y externa; con presupuesto asignado nunca antes visto en el mercado peruano.

- Quinta etapa: En desarrollo durante el 2008

En esta etapa continuamos desalentando el consumo excesivo y hemos relanzado la campaña Ponte un Límite con el comercial de TV, un nuevo comercial de radio y auspicio de programas radiales. A partir de diciembre también tendremos presencia con paneles y con acciones de BTL en las playas del Sur de Lima. Adicionalmente se desarrollará una campaña dirigida a desalentar la venta de bebidas alcohólicas a menores de edad en alianza con diversas instituciones de la sociedad y las municipalidades. A través del programa educativo Escuela Virtual Backus estamos diseñando un programa de capacitación virtual para docentes como agentes preventivos de Vida Saludable. Asimismo a partir de febrero del 2009 estaremos desarrollando talleres de capacitación a los puntos de venta chapa cerrada para la no venta a menores de edad.

Relacionamiento con principales stakeholders como estrategia para reducir los daños del consumo excesivo y nocivo de bebidas alcohólicas:

- En Backus, hemos venido realizando reuniones con nuestros principales grupos de interés con la finalidad de compartir con ellos nuestro marco de desarrollo sostenible y algunos aspectos de la problemática de la industria de bebidas alcohólicas: informalidad y los problemas de salud que ésta genera, regulaciones estrictas al sector, impuestos, entre otros. Las reuniones se llevaron a cabo en Lima, ciudad en la que se involucro a ONGs relacionadas con temas de medio ambiente, salud, alcohol, entre otras; y en las principales ciudades del país (Trujillo, Chiclayo, Arequipa, Cusco e Iquitos).
- Reuniones con actores vinculados a los temas de informalidad y a la salud:
 - o Ministerio de Salud: hemos brindado apoyo y financiamiento a la campaña iniciada por el Ministerio de Salud “Amor y Control” en contra el consumo nocivo del alcohol. Esta campaña pretende combatir el consumo excesivo de bebidas alcohólicas y los daños que puede ocasionar.
 - o Ministerio de la Producción: se conformó un equipo de trabajo con representantes del Ministerio de la Producción, la Sociedad Nacional de Industrias y representantes de Backus con la finalidad de concretar el proyecto de “Ley para la eliminación de la producción de alcohol etílico destinado a la fabricación de bebidas alcohólicas informales”. Se vienen realizando reuniones periódicas de trabajo.
 - o Cerveceros Latinoamericanos: Backus estuvo presente en la reunión de Cerveceros Latinoamericanos (Sede Miami) presentando el tema “Informalidad en el mercado de bebidas alcohólicas en las principales ciudades del Perú”, en la reunión se encontraban representantes de diversas cervecerías latinoamericanas y el Sr. Juergen Rehm, asesor de la OMS.

Citaremos algunas declaraciones de nuestros stakeholders:

En la firma del Código de Autorregulación Sr. Carlos Arturo Mejía, Presidente del Consejo Regulador de la Denominación de Origen Pisco, manifestó su total satisfacción enfatizando que *“Backus como líder cervecero y los productores de pisco, como licor bandera del Perú, dan un paso importante en su demostración de ser industrias concientes de su responsabilidad frente a los consumidores peruanos”*.

Reconocimiento Colectivo FemTV¹: *“Por la elaboración del Código de Autorregulación de Comunicación Comercial, iniciativa que consideramos un avance importante en el objetivo de colocar la publicidad en el terreno de los valores éticos dentro del marco de lo que es el desempeño de una empresa socialmente responsable”*

¹ Integrado por organizaciones de la sociedad civil que promueven los derechos humanos de las mujeres y están orientados a erradicar contenidos discriminatorios de la publicidad televisiva.

APCV is the voice of Portuguese beer sector and represents, through its association members, 100% of the Portugal's beer production, made by 6 breweries. Portugal's breweries also generate, directly and indirectly, around 122 000 jobs and €900 million in taxes for governments each year.

Furthermore, the product we produce, beer, is a refreshing enjoyable beverage with relatively low alcoholic strength which brings pleasure and social interaction to many people, and it is reassuring for those who do consume beer regularly to know that it can also be part of an adult's healthy lifestyle, with the WHO recognising the health benefits associated with responsible, moderate consumption. The vast majority of Portuguese consumers drink responsibly. Portuguese's brewers are committed to promoting responsible beer consumption and to being part of the solution with regard to tackling the alcohol misuse of a small percentage of Portuguese citizens. Karl Mann noted in 2003 that, in research into alcohol, "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 has led to a dependence on measures that attempt to reduce overall consumption. In Nordic countries such measures have neither prevented strong (recorded and unrecorded) consumption growth nor reduced problems. Meanwhile the factors leading to the reductions in overall consumption in France, Italy, Spain and **Portugal**, which cannot be explained by the introduction of control measures, have not been well examined.

What are your views on effective strategies to reduce alcohol-related harm?

In APCV's opinion, to have a sustainable impact, effective strategies to reduce alcohol-related harm need to:-

- Be evidence based and practical;
- Differentiate between alcohol consumption and alcohol misuse;
- Distinguish between consumers and abusers;
- Understand and target the problems;
- Identify and classify the drivers of different, both positive and negative, drinking behaviours;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the fact that consumers are buying a drink, not just alcohol, and selecting their beverage (e.g. beer brand x) on the basis of numerous factors (including taste, occasion, culture, tradition, weather etc.), not just alcoholic strength;
- Recognise the importance of education and training;
- Encourage *responsible* behaviour;
- Be designed for the long term;
- Engage stakeholders through partnerships.

Thus, effective, targeted interventions include:-

- Social interventions to reduce perceptions that heavy drinking is accepted and normal;
- Health-sector preventive measures against hazardous and harmful alcohol consumption, such as screening and brief interventions;

- Educational tools for young people and families;
- Enforcement of existing national drink-driving legislation and tough sanctions that deter;
- Enforcement of legal purchasing and drinking age legislation;
- Drink driving reduction strategies for repeat offenders and novice drivers;
- Encouraging responsible serving in outlets.

On the other hand, measures which aim to reduce overall consumption:

- Have little effect on misusers;
- Compromise the pleasure of the millions who drink responsibly.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, we believe therefore that the most effective approach needs to reflect:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- A fair and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy;
- The WHO's six-point agenda for responding to challenges, wherein the third agenda point - strengthening health systems - can be acted upon through encouraging screening and brief interventions in the health-sector.

Building on these fundamental principles on the most appropriate ways to tackle alcohol-related harm, across Europe the brewing sector therefore has long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, including through partnerships with government and other stakeholders.

AN INTERESTING INITIATIVE IN RESPECT OF INVOLVING ALL RELEVANT STAKEHOLDERS IS THE EU ALCOHOL AND HEALTH FORUM, WHICH IS BASED ON A POSITIVE, ACTION-ORIENTED, MULTI-SECTORIAL, MULTI-STAKEHOLDER APPROACH TO ADDRESSING THE PROBLEMS ASSOCIATED WITH INAPPROPRIATE ALCOHOL CONSUMPTION. THE FORUM AIMS TO PROVIDE A COMMON PLATFORM FOR ALL INTERESTED STAKEHOLDERS AT EU LEVEL THAT PLEDGE TO STEP UP ACTIONS RELEVANT TO REDUCING ALCOHOL-RELATED HARM. THAT THE EUROPEAN COMMISSION AND THE EU MEMBER STATES PROMOTE THE MULTI-STAKEHOLDER APPROACH AS A WAY FORWARD IN ADDRESSING ALCOHOL-RELATED HARM IS AN EXTREMELY PROMISING, THOUGH CHALLENGING, GESTURE. BY DEFINITION, ALL THOSE STAKEHOLDERS HAVING SIGNED THE FORUM'S CHARTER ENDORSE THIS APPROACH.

WE TRUST THAT SUCH AN APPROACH AS THE ALCOHOL AND HEALTH FORUM MAY BE CONSIDERED AS A TEMPLATE FOR SIMILAR PLATFORMS AT ALL DIFFERENT LEVELS, IN PARTICULAR AT COUNTRY LEVEL.

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

APCV and its members remain committed to developing new campaigns addressing alcohol misuse-related issues as diverse as binge drinking, alcohol and pregnancy, underage drinking, and drink-driving and also to ensuring that their implementation is monitored and evaluated. In this way best practice can gain further support and be transferred and adapted to tackle similar alcohol misuse-related problems in other countries.

Concrete recent examples of the leading role played by APCV include:-

- 1 commitment under the EU Alcohol and Health Forum;
- Signing the European Road Safety Charter;
- Founding Member of the independent European Research Advisory Board for funding alcohol research.
- Contributing to the Worldwide Brewing Alliance's (WBA) Drinking and Driving Reports;
- Creating and implementing the Self-regulation Code for Commercial Communications on Beer
- Implementing several national actions on drink and driving (eg. Crash initiative; outdoors on Portuguese roads)

Moreover, APCV is actively participating, since June 2008, in talks with IDT (the government's alcohol policy institute) for setting up a new draft on a National Alcohol Plan 2009-2012 for addressing the alcohol misuse.

Our APCV's members (breweries) have the issue of tackling alcohol misuse on the top of their agenda and are committed themselves to establish proactively actions aimed at addressing

alcohol misuse-related issues as diverse as:-

- Promoting responsible consumption, particularly amongst young adults;
- Guaranteeing that commercial communications do not encourage inappropriate drinking behaviours, and that the self-regulatory mechanisms are put in place for consumers to complain if they feel the local advertising codes are being broken.

An important feature of these commitments is the number and diversity of partnerships with other stakeholders who also wish to support, finance and associate themselves with these commitments. Examples of partners are:

- National government;
- Local and regional authorities;
- Road safety authorities;
- Driving schools;
- Police Authorities;
- Other civil society individuals (lawyers, teachers, attorneys, professors, academics etc.);
- Young adults (18-30);
- Health and medical associations;
- Consumer Groups;
- Self-regulatory organizations;
- Other alcoholic drinks producers;
- Horeca, Retailers and Distributors;
- Media Broadcasters;
- Advertising Agencies;
- Other industries.

If the EU's strategy to support Member States in reducing alcohol-related harm and the Alcohol and Health forum remain focused on nurturing best practice initiatives that, on the local level, target alcohol misuse where it occurs, then APCV and its members remain committed to developing and further improving these campaigns.

APCV as associate member of The Brewers of Europe itself also contribute to the reduction of alcohol-related harm, concrete examples of the leading role we play in this matter, particularly in facilitating the sharing of best practice and experiences and stimulating new initiatives, include:-

- Submitting commitments from our Brewers of Europe members under the EU Alcohol and Health Forum (2007, 2008);
- Producing detailed recommended operational standards for increasing the effectiveness of self-regulatory systems (2007, 2008);
- Signing and committing to the EU Alcohol and Health Forum's Charter (2007 and ongoing);
- Contributing to the Worldwide Brewing Alliance's (WBA) Drinking and Driving Reports (2004, 2006, 2008);

- Commissioning Canadian Reports on Responsible Marketing (2002, 2005);
- Signing and committing to the European Road Safety Charter (2004 and ongoing);
- Organising self-Regulation workshops (2003, 2004, 2007, 2008);
- Developing and adopting Guidelines and a Manual for Responsible Commercial Communications (2003, 2004);
- Contributing 300 initiatives to the WBA's "Global social responsibility initiatives" publication (2003, 2006);
- Founding the European Research Advisory Board, an independent alcohol research foundation, established to fund biomedical and psychosocial research into beer and other alcoholic drinks (2003 and ongoing);
- Organising the European Working for Responsible Consumption Conference (2002);
- Collating campaigns for a publication on European brewers' initiatives to combat misuse (2002).

Some of our pro-active inputs into the dialogue so far with government and stakeholders have included:-

- The Weinberg Group's "Independent review of issues related to alcohol consumption in Europe" (2006);
- Ernst & Young's report on "The contribution made by beer to the European economy" (2006);
- Beer & Health Symposia (1999, 2001, 2003, 2006, 2008);
- EU alcohol-related harm strategy Submissions (2004, 2005).

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

Effective strategies should:

Incorporate a range of stakeholders: The development and implementation of strategies to reduce alcohol-related harm should involve a variety of relevant stakeholders. The responsibility for alcohol harm and misuse lies not only with alcohol producers, government and/or individuals, but is a collective responsibility. For example in countries where excessive drinking has become socially acceptable the media have a strong role to play in fostering a positive and healthy change in attitudes towards alcohol consumption; retailers meanwhile are on the front line in controlling access to alcohol. All stakeholders, including government and NGOs, have roles to play in developing a balanced and effective response both in the development and, where relevant, implementation of strategies.

Incorporate individual responsibility: Acknowledging individual responsibility as a key aspect should be central to the development of strategies to reduce alcohol-related harm. By empowering consumers to make informed, positive choices about alcohol the need for legislative and other policy levers is reduced and long-term change is promulgated.

Evidence-based: Whilst acknowledging that there are no simple solutions as well as the difficulties in collecting data on alcohol consumption and other related trends, strategies should be based on sound transparent evidence. This evidence should be openly available to all stakeholders to assess within the context of national culture and circumstances.

Targeted interventions: Strategies to reduce alcohol-related harm should be relevant to long-term aims to educate and inform consumers and to build respect for the effects of alcohol whilst not unnecessarily punishing the majority of consumers that enjoy alcohol as part of their national culture in a way that is safe, sensible and social.

Flexible policy interventions: Successful strategies are likely to incorporate a balanced use/menu of policy interventions that can be adapted to national and cultural contexts.

Balanced interventions: Strategies to reduce alcohol harm and misuse need also to be balanced with wider social and economic considerations and should bear in mind the positive economic and social contribution that alcohol can make within national contexts. Short-term political or economic gain should be avoided to maximise the long-term and sustainable effectiveness of any strategies.

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

Best ways to reduce harmful use of alcohol:

Improved guidance for healthcare professionals on dealing with alcohol-related harm: As the main providers of health care, the many millions of health workers worldwide can contribute to substantially reducing and preventing harmful use of alcohol.

Providing accurate and balanced information about alcohol consumption: Consumers should be provided with accurate and balanced information on alcohol consumption so that they can make informed, positive choices.

Educating consumers through a variety of media: Messages on developing healthy attitudes to alcohol consumption can be disseminated in a variety of formats. Multi-stakeholder competencies should be leveraged to lead innovative and targeted campaigns and programmes that approach the issue of alcohol harm and misuse from a variety of mediums relevant to national contexts.

Developing multi-stakeholder partnerships: Alcohol-related harm involves a wide variety of stakeholders which should be involved in interventions. Ensuring government,

NGOs, industry (e.g. retailers, media etc.) and other stakeholders are involved in interventions will enable the development of balanced and flexible interventions that leverage the relevant skills and capabilities of all sectors of society.

Including individual responsibility: Individual responsibility needs to be encouraged as a key part of strategies to reduce alcohol harm and misuse.

Advocating policies that discourage the informal alcohol market: According to WHO's own statistics, the informal alcohol represents roughly half of all the alcohol consumed in the world

Effective enforcement of existing laws: Ensuring the effective enforcement of existing laws to prevent alcohol harm and abuse.

3. *In what ways can you or your organisation contribute to reduce the harmful use of alcohol?*

- **Providing accurate and balanced information about alcohol consumption to consumers:** We are developing a new corporate website which will include information on relevant alcohol responsibility information for consumers, including the amount of UK alcohol units in our brands and position papers on key issues, amongst other information. Our parent company, SABMiller Plc has also recently launched a website (talkingalcohol.com) that brings together available health and social considerations around alcohol consumption – answering all these questions and many more. The site also includes factual information about many of SABMiller's brands, such as calories, alcohol content, cereal grains and the brewing process overall, but does not market our brands. Visitors will also be able to hear from experts on topics such as parenting, alcohol policy, and health.
- **Best practice labelling and packaging:** We are applying the UK Government's recommended voluntary information on alcohol responsibility in full. This includes a responsibility message, the drinkaware.co.uk website address (see below), government recommended guideline daily drinking amounts for men and women, a pregnancy warning, and UK alcohol unit information.
- **Working in partnership on strategy interventions:** We are already working with our industry colleagues and others on a range of initiatives. These include:
 - **The Drinkaware Trust:** We are supporting members of the Drinkaware trust an independent industry initiative that promotes responsible drinking and finds innovative ways to challenge the national drinking culture and tackle alcohol misuse, including the management and maintenance of the Drinkaware.co.uk website – an authoritative and comprehensive source of information for consumers on alcohol responsibility,
 - **Project 10:** Project 10 is a collaborative initiative made up of retailers, producers and trade Bodies, together with the Portman Group and the DrinkAware Trust, to form a practical body committed to reducing alcohol-related anti-social behaviour, disorder and health harms and to challenge tolerance of drunken behaviour and which is planning for a £100m campaign fully funded by its members.
 - **Alcohol Awareness Week:** We partnered with a key retailer and other drinks producers on an initiative for Alcohol Awareness Week in Scotland. The initiative helped to raise public awareness of responsible drinking issues and offered consumers a free bottle of water with each purchase of alcohol.
- **Internal education:** Establishing workplace policies that reinforce high levels of employee conduct in relation to alcohol consumption: We have developed our own employee alcohol policy and trained all staff as ambassadors, to encourage responsible alcohol consumption within their sphere of influence, on this policy as

well as wider issues of alcohol responsibility in the UK. The training was led by a team of both senior and junior staff and was extremely well received by employees.

- **Best practice responsible marketing:** Ensuring our marketing meets best practice in terms of responsibility messaging and adherence to both mandatory and voluntary regulations and codes in both spirit and letter: Our marketing is fully compliant with legislative and regulatory requirements. In addition we are fully committed to ensuring that our marketing meets both the spirit and the letter of internal and external voluntary codes and initiatives, such as the UK Portman Group code on the Naming Packaging and Promotion of Alcoholic drinks. We have a marketing responsibility committee that meets weekly to review ALL marketing materials produced by our company and which is comprised of senior employees from across the business, including our managing director. We are part of a SABMiller Europe commitment to the EU Alcohol and Health Forum to train all our relevant staff on our new internal marketing code before the end of the financial year.
- **Sharing best practice:** We are actively involved in spreading best practice both amongst the other companies within SABMiller and through our engagement with other stakeholders such as the British Beer and Pub Association (BBPA).
- **Leveraging industry capabilities:** Accessing target consumers with messages and information and using the marketing capabilities and other skills of our business and wider industry to foster positive attitudes and choices with regard to alcohol and in partnership with others.

WHO consultation response

Summary

The Wine and Spirit Trade Association (WSTA) fully recognises that there is a minority of the population which cause damage to their health and to the wider community through their misuse of alcohol. The industry believes in working in partnership with governments to tackle these serious problems and reduce harm from alcohol misuse.

In drawing up policies to reduce harm from problem drinkers, it is essential to base solutions on the facts and evidence of what works. It is also crucial, not least to maintain the vital support of the public, that policies are seen to be both effective and fair. While not underestimating the scale and seriousness of alcohol misuse, any strategy must recognise that the vast majority of people drink responsibly and that the majority of businesses behave in a responsible manner and should be seen as part of the solution.

We consider that any future policy development must be based on the principles of good policy making and should be:

- Evidence-based
- Fair
- Proportionate
- Effective
- Consistent
- Avoid unintended consequences

The WSTA believes that any effective strategy to address alcohol problems needs to be broad-based, involve a multi-component approach, and should be implemented in concert with other measures to address behavioural and social issues. Such an approach should involve more rigorous enforcement of existing laws designed to combat alcohol misuse and deploy the efforts of all community stakeholders to deliver cultural change.

Clearly, any global strategy must take account of the many cultures of the world and differing attitudes to alcohol. In some countries, for example, illicit trading of alcohol products is far more prevalent than any issues surrounding the alcohol misuse of those buying alcohol legally. Enforcement of the existing law must be the first priority for any strategy before any ameliorative approach can be explored.

Full text of submission

Introduction

The Wine and Spirit Trade Association (WSTA) represents 331 businesses who work

across the entirety of the wine and spirit supply chain throughout the United Kingdom. Our membership includes producers, importers, wholesalers, bottlers, warehouse keepers, logistics specialists, brand owners and off-licence retailers, including supermarkets and specialist stores.

The WSTA works with its members to promote the responsible production, marketing and sale of alcohol and to share best practice with the entire trade.

➤ **Question 1: Effective strategies to reduce alcohol-related harm**

In the UK the alcohol industry has initiated and developed a number of projects and mechanisms to raise awareness around responsible drinking; to provide transparent guidelines for the industry; and to tackle alcohol misuse and underage sales. Please find below a summary of our key projects:

A. Industry Standards

The Social Responsibility Standards were launched in November 2005 as a comprehensive set of standards for the production and sale of alcoholic drinks in the UK. The Standards were developed and adopted by 16 different industry trade associations. The Standards can be found online [here](#).

B. Portman Group Code

The Portman Group was set up in 1989 by a group of UK drinks producers in order to tackle the social problems associated with alcohol misuse. The Portman Group's Code of Practice was revised in 1996 to regulate the naming, packaging and "below the line" promotion of alcoholic products. The Code, which is supported throughout the industry, seeks to ensure that drinks are marketed in a socially responsible way and to an adult audience only. Code rules apply to all pre-packaged alcoholic drinks and covers the drink's naming, packaging, point-of-sale advertising, brand websites, sponsorship, branded merchandise, advertorials, press releases and sampling. The WSTA is a signatory to the Code and encourages its members to sign up as well. The Code, which was revised again in 2007, can be found online [here](#).

C. Drinkaware Trust

The Drinkaware Trust is a UK-wide charity aiming to reduce alcohol misuse and minimise alcohol related harm by changing public behaviour and challenging the national drinking culture. Drinkaware is supported by the alcohol drinks industry, government and a wide range of stakeholders in the health, education and voluntary sectors. The WSTA encourages members to incorporate the drinkaware logo on advertising, point of sale materials and product labelling. Drinkaware is online [here](#).

D. Retail of Alcohol Standards Group (RASG)

RASG was formed at the end of 2005 when several major retailers of alcohol came together to examine ways they could cooperate to reduce the incidence of alcohol sales to minors. Coordinated by the WSTA, RASG developed an Action Plan with four main aspects:

- To reduce opportunities for children to buy alcohol;
- To build effective partnerships between retailers and enforcement agencies;
- To develop intelligence-led enforcement techniques;
- To better understand why underage sales are made and how best to prevent them in the future.

Challenge 21

RASG members all use "Under 21" signage which has been designed to support the Challenge 21 approach to the sale of alcohol. This encourages anyone who is over 18 but looks under 21 to carry acceptable ID (a card bearing the PASS hologram, a photographic driving licence or a passport) if they wish to buy alcohol. The signage is available free of charge to all retailers in the off- and on-trades.

Community Alcohol Partnership (CAP)

The partnership approach at a local level is a proven way of delivering results in terms of reducing alcohol related harm and misuse. In September 2007, RASG began a new initiative, the Community Alcohol Partnership (CAP), to reduce alcohol-related disorder. It aims to bring about a cultural change by improving information-sharing between off-trade retailers, the local police and Trading Standards officers. A successful pilot project was carried out in a Cambridgeshire town with a history of anti-social behaviour and youth-related disorder. This scheme will now be rolled out to other local areas across the UK. Read more about the project and its successes [here](#).

Point of Sale (POS) Materials

This consumer awareness campaign has been developed by the WSTA and Drinkaware and has been designed to complement the Government's ongoing 'Know Your Limits' campaign on unit awareness. These materials provide consumers with advice and guidance at the point of sale via stickers and posters that outline the alcohol content of individual drinks as well as providing tips and hints about how to enjoy alcohol in a

non-harmful manner. All of these messages are in line with the Government's advice to consumers that it is not recommended to regularly exceed daily unit guidelines which are: 2-3 units for women and 3-4 units for men.

Database of Initiatives

A full round up of the projects and initiatives the industry is also engaged in is available online here [here](#).

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

Targeted interventions over broad brush policies – The industry fully recognises that there is a minority of the population which causes damage to its health and to the wider community through its misuse of alcohol. However, the majority of people enjoy alcohol responsibly and the industry is keen to encourage initiatives which target the specific problem groups and doesn't penalise the wider population. This approach is also likely to win crucial public support which will help gradual cultural change where necessary.

Reasonable regulation – Excessive regulation can be counter productive for example a forced rise in alcohol pricing would inevitably lead to an increase in illicit selling. As demonstrated above, the industry has been demonstrably proactive in implementing and developing initiatives, the initiative for which would disappear if regulation was enforced.

Opportunities for multi stakeholder partnerships - Targeted interventions to reduce harmful drinking are best delivered in partnership with industry members well positioned to play a substantial role. The industry has information, expertise and experience on effective public awareness campaigns and how to prevent excessive consumption among youths.

Appropriate policy levels for local, national and global conditions - It is critical that any policy or strategy relating to alcohol should take into consideration the best level of government for implementation. Significant cultural variations exist in the place of alcohol in society and predominant drinking practices in each country, region and locality will have consumption issues relating to alcohol. Interventions must be targeted according to the 'community' make-up, resources made available, specific concerns and desired results sought.

Seller and Server Training - High levels of awareness and training amongst staff both in the off and on trades have proved successful in minimising harm when combined with support from management and effective law enforcement. Alcohol serving establishments can train staff about standard drink sizes, regulating the drinking environment, proper identification checking, recognising drunkenness – the main

emphasis being to avoid selling alcohol to minors and intoxicated customers thereby reducing the incidence of alcohol related problems.

Education - At the WSTA, we have strongly encouraged member companies to provide effective information to adult consumers, many of whom will be providing a role model as parents or carers of young people, through point of sale messaging developed by the Drinkaware Trust which appears on label messages used by large parts of the industry. This is now being rolled out widely in our retailer member stores and through producer members into the on-trade.

The Wine and Spirit Education Trust is also working towards including a section on responsible drinking in its courses which are taken by thousands of candidates worldwide.

The industry is also contributing to providing further information and education to reduce the amount of problem drinking in the United Kingdom through supporting the education of young people about the dangers of drink and increasing awareness of sensible drinking guidelines.

Many commentators have attacked education as being ineffective in changing drinking behaviour. In fact there has been very little research in the area, but education will only be effective if it is “fit for purpose”, given the appropriate time on the curriculum and delivered by properly trained members of staff. Often alcohol education is mixed in with drugs, smoking, sexual health and a range of other subjects and is delivered in ways unlikely to influence the behaviours of teenagers.

The Community Alcohol Partnership discussed above uses education and intervention in schools as a key component of its successful reduction of alcohol harm among young people. Using this education model and increasing awareness in the community ensures that investments in police enforcement pay larger dividends.

There is a long way to go to improve the quality of education to children and information to parents. There are some excellent examples of projects from other countries that have made an impact and we are currently looking at the development of a couple of major pilot projects with member companies to introduce similar schemes to the UK.

Please find below key components which the WSTA has employed to successfully contribute to promote responsible drinking:

Engage the support of the public – Public support is vital for the achieving a long term social and cultural change in attitudes towards alcohol. There is no magic bullet solution to the problem of alcohol misuse which can only truly be addressed through gradual

awareness raising and educational projects. Harnessing public support will be infinitely more effective than imposing penalty policies which the Government has to enforce.

Build on and develop existing work – We have outlined a number of initiatives above which the industry has instigated and developed. Click [here](#) for a full list of initiatives. Any government policy or strategy should recognise the work which has already been carried out and look to build on successful programmes.

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

Please refer to Q1 which outlines the effective strategies which the WSTA and its members have implemented to prevent harm from alcohol misuse.

11 November 2008

Dr Vladimir Poznyak
Coordinator, Management of Substance Abuse
Department of Mental Health and Substance Abuse

Posted on WHO Website:

http://www.who.int/substance_abuse/activities/submit_form/en/index.html

Dear Dr Poznyak

Submission to public hearing on ways of reducing harmful use of alcohol

1. Introduction

The Winemakers' Federation of Australia is pleased to provide this submission to contribute to WHO efforts in developing a global strategy to combat the harmful use of alcohol.

The Winemakers' Federation of Australia (WFA), established in 1990, is the national peak body for the wine industry, representing Australia's wineries on all national and international issues. WFA operates by voluntary membership with specific representation for small, medium and large producers. Current WFA membership collectively accounts for over 90% of wine production in Australia.

WFA provides policy leadership on the issues of business climate, social responsibility, environmental sustainability, innovation, trade, and benchmarking issues that are critical to the enduring viability of Australia's wineries.

Throughout this submission, reference to the "Australia wine sector" is broadly defined to be inclusive of all aspects of the supply chain and production of wine.

2. The WHO Global Strategy to Combat the Harmful Use of Alcohol

The Australian wine sector welcomed WHA Resolution 61.4 on Strategies to Reduce the Harmful Use of Alcohol and the WFA, on behalf of the Australian wine sector, will positively contribute to the development of the global strategy at every opportunity. Our contribution will generally be via remote input due to resource constraints.

The WHA resolution identifies differences between Member States and the differences in policy responses therefore required to address the complexities associated with alcohol misuse. While the WFA submission will be limited predominantly to the Australian context, it is clear the most effective policies and programs will be long-term, tailored to specific circumstances at which they are

directed, and must include a holistic consideration of potential unintended consequences, as well as intended outcomes. Put simply, one size does not fit all, and the suggested solution must not be more damaging than the problem it seeks to address.

WFA is committed to a regulatory regime to address misuse of alcohol that balances self-regulation and co-regulation, education and empowerment to facilitate personal responsibility, and government legislation.

The WFA would advocate a new approach in developing the Global Strategy to Reduce the Harmful Use of Alcohol. The standard calls for increased taxation, increased government regulation and restrictions on supply fail to take into consideration the complex nature of those consumers who do consume alcohol to excess and the drivers behind their decisions.

There are demonstrated benefits associated with moderate consumption of wine and these benefits should not be threatened through policies and programs that penalise moderate wine consumers. While wine can be demonstrated to be price elastic, there is no evidence that abusive consumption will be addressed through increased price. Abusive consumers do not react to price in the same way as responsible consumers and are less likely to alter behaviour, or to simply substitute for lower priced products or other substances in reaction to increases in price.

Interventions that target harmful consumption of alcohol, as opposed to all consumption, can be effective if conducted through long-term, funded programs on a partnership basis between government, economic operators, non-government organisations and other stakeholders.

3. The Australian Wine Sector's Contribution to Regional Employment and the Australian Economy

The economic contribution of the wine sector provides the financial basis for many Australian rural economies. Regional communities all over Australia have been involved in grape growing and winemaking for generations, and rely on the wine sector as a major employer.

The Australian wine sector is one of Australia's major success stories. Over recent decades, the sector has enjoyed strong production and export growth, substantial investment, high levels of innovation and increased employment, particularly in regional communities. The wine industry has contributed positively to the economy, through income and employment particularly in regional areas, as well as through multiplier effects to other industries (including tourism and retail) and the balance of payments in major export earning.

With over 2,000 wineries and 10,000 vineyards spread across 60 different wine regions, rural areas are the foundation of the wine industry in Australia. The vast majority of wineries are small with around 70% having an annual crush of less than 100 tonnes.

The WFA would emphasise that any policy responses promoted in the Global Strategy to Reduce the Harmful Consumption of Alcohol must be cognisant of the

impacts of such policies on producers and associated industries. Decimating the Australian wine sector through inappropriate Government policy would lead to significant economic hardship for thousands of grapegrowers and winemakers in Australia, as well as negative impacts on tourism and hospitality and regional communities that are dependant on the economic stimulus generated by the wine sector.

4. Australian Wine Sector's Commitment to Social Responsibility

The WFA has taken a leadership role in promoting health and social responsibility initiatives addressing alcohol consumption. When consumed in moderation, in a manner consistent with the Australian Alcohol Guidelines – Health Risks and Benefits (October 2001), wine is part of a healthy lifestyle.

At the same time, WFA recognises that wine is not always consumed in moderation. The wine sector has a responsibility to produce, promote and sell wine in a manner that is sustainable and responsible .

In May 2007, the Australian wine sector launched *Directions to 2025: An Industry Strategy for Sustainable Success*. The *Directions* strategy included a core commitment to social responsibility through specific strategic responses by the Australian industry.

In line with *Directions to 2025*, the Australian wine sector has embraced a vision for wine to be recognised as a lifestyle beverage to be enjoyed in moderation and for the industry to advocate sustainable and socially responsible consumption of wine.

To advance this vision, WFA has initiated a number of programs, including:

- The development and promotion of standard drinks labelling
- The initiation of advertising self regulation on alcohol products
- The promotion of appropriate levels of consumption for males and females
- The development of close working relations with Federal and State Government agencies in the development of policies and guidelines
- Partnering with other alcohol sectors in the formation of DrinkWise Australia to promote change towards a more responsible drinking culture in Australia

The Australian wine sector is committed to continue working with the Australian Government and the wider community to ensure the benefits of moderate wine consumption are maximised and excessive consumption and associated harms are minimised in every possible way.

4.1 DrinkWise Australia

Established in 2005, DrinkWise Australia works to promote a more responsible drinking culture in Australia. DrinkWise Australia takes a multi-disciplinary approach, which pursues all effective means of addressing irresponsible drinking, while also acknowledging the positive health and social impacts of drinking in moderation. DrinkWise Australia has the long term aim to see “drinking to get drunk” becoming socially unacceptable to the next generation.

In June 2008, DrinkWise launched a major social change campaign titled *Kids Absorb Your Drinking*. The long-term focus of the campaign is to influence attitudes

towards drinking so that future generations will view alcohol in a more responsible manner. DrinkWise has a fully interactive website containing a wealth of useful information about how to enjoy alcohol safely: www.drinkwise.com.au

4.2 National Wine Foundation

The National Wine Foundation (NWF) was established in 2001 with funds raised from the sale of the special Centenary of Federation Red Wine, all aspects of which were donated by wine businesses. The funds raised are used to provide grants to targeted projects which promote positive social or economic outcomes, particularly in remote, regional or indigenous communities.

5. Alcohol Advertising in Australia – the Alcohol Beverages Advertising Scheme

Australia has a quasi-regulatory system for alcohol advertising; that is, guidelines for advertising have been negotiated with government, consumer complaints are handled independently, but all costs to run the scheme are borne by the alcohol industry. The centrepiece of the system is the Alcohol Beverages Advertising Code (ABAC).

The ABAC Scheme aims to ensure that alcohol advertising will be conducted in a manner which neither conflicts with, nor detracts from, the need for responsibility and moderation in liquor merchandising and consumption and which does not encourage consumption by underage persons.

The ABAC Scheme is a clear demonstration of the effectiveness of industry and government working together to regulate through a voluntary scheme with government input. The scheme will continue to be strengthened over time and will adapt to changing consumer expectations.

6. Health information labels on alcohol products

6.1 Current Requirements

Under the current labelling requirements in Australia, all wine producers are required to state the number of standard drinks contained in their bottle or packaging. Alcohol beverages are also required to have an alcohol content statement included on the label.

In addition, wine producers are voluntarily adopting a standard drinks logo and responsible consumption messages on package labels such as “Enjoy wine in moderation”.

6.2 Current inquiries into warning labels

Food Standards Australia New Zealand (FSANZ) is considering mandatory health warnings on packaged alcohol at the request of the Australian Governments plus an application for mandatory pregnancy health advisory labels on alcoholic beverages (Application A576). FSANZ have indicated both the pregnancy warning labels and the inquiry into general warning labels will be considered together, with an initial assessment due in 2009.

7. National Alcohol Strategy 2006 - 2009

The Winemakers' Federation of Australia provided strong input into the development of the National Alcohol Strategy 2006 – 2009. The National Alcohol Strategy 2006-2009 is “a plan for action developed through collaboration between Australian governments, nongovernment and industry partners and the broader community”.

From the Strategy document

It (the Strategy) outlines priority areas for coordinated action to develop drinking cultures that support a reduction in alcohol-related harm in Australia. The Strategy seeks to reflect the National Drug Strategy: Australia's integrated framework 2004–2009 and build on the previous alcohol strategy. It also supports the key result areas of the National Drug Strategy Aboriginal and Torres Strait Islander Peoples Complementary Action Plan 2003–2006, which was endorsed by the MCDS in August 2003.

The strategy is available for download from:

<http://www.alcohol.gov.au/internet/alcohol/publishing.nsf/Content/nas-06-09>

The Strategy is currently being evaluated and the Australian Government is conducting a number of reviews into alcohol policy in Australia. Following is an outline of the two key Australian Government Reviews around alcohol policy.

8. Inquires Currently underway on Alcohol Policy in Australia

8.1 Preventative Health Taskforce

The Australian Government established a new National Preventative Health Taskforce (the Taskforce) in 2008 which will develop strategies to tackle the health challenges caused by tobacco, alcohol and obesity, and develop a National Preventative Health Strategy by June 2009.

The Taskforce has recently released a discussion paper *Australia: The healthiest Country by 2020*. The discussion paper identifies a range of options to tackle the issue of obesity, tobacco, and excessive consumption of alcohol.

8.2 Review of Alcohol Policy

The Australian governments are conducting a review of alcohol policy across a number of areas which will incorporate:

- a national policy framework for Responsible Service of alcohol;
- a preferred regulatory model to address secondary supply of alcohol to minors;
- options for reducing alcohol content in products including those aimed at young people;
- possible standards and controls for alcohol advertising targeting young people; and
- advice regarding the impact of health warnings on drinking behaviours.

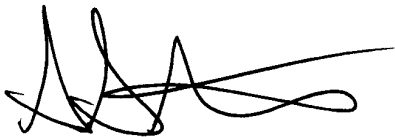
9. Conclusion

The WFA supports a cooperative approach to addressing alcohol misuse incorporating all stakeholders including governments, economic operators, non-government organisations and health professionals. We welcome the opportunity to provide this submission into the WHO consultation process.

From the Australian perspective, it is essential that consideration be given of the impact of any proposed strategies on wine businesses and the associated employment and economic contribution to regional economies. In the context of the global strategy, recommended policy and program responses must take account of the unique characteristics of member states, existing government efforts, and potential impacts on all stakeholders in seeking to deliver improved health outcomes.

The WFA looks forward to ongoing participation in the consultation process in the development of the global strategy, and ultimately to continuing to contribute to reducing irresponsible consumption of wine in Australia.

Yours sincerely

A handwritten signature in black ink, appearing to be 'S. Strachan', with a long horizontal line extending to the right.

STEPHEN STRACHAN
Chief Executive
Winemakers' Federation of Australia

CONSUMERRELATIONS

Well established consumer relations are important to maintain a credible reputation in the society. Therefore special care is displayed towards vulnerable groups such as e.g. children and young people and abusers of alcohol. For this reason, the introduction of preventive initiatives is core. It is vital that young people do not begin drinking alcohol too early in life.

The Danish Brewers' Association states

... that the brewery sector supports the drink recommendations defined by the Danish National Board of Health by voluntarily labelling their products with information on drink content.



Special care must be taken regarding children and very young people since this group should not drink beer. The Danish Brewers' Association therefore supports age limit restrictions on the sale and serving of alcohol. This ensures a separation between child and adult culture. The Danish Brewers' Association believes that the age limit for the sale of alcohol must be realistic and must have support from the general population. If the age limit is set too high the result will be a circumvention of rules and hence become ineffective. The Danish Brewers' Association therefore states that the existing age limit restrictions on sale at 16 years and on serving at 18 years are effective and should be maintained.

It is important that adult consumers have a natural and relaxed relationship with alcohol consumption and that they are familiar with the effects of moderate use. Therefore the Danish Brewers' Association plays a role as originator and partner in the development of various forms of informational material and campaigns that educate consumers on

appropriate alcohol habits and calls for a dialogue between interested parties. In addition to this the Danish Brewers' Association targets differentiated communication to specific groups – e.g. children and young people, parents or abusers of alcohol – to ensure the best possible passing on of messages.

Further legislation in this area will probably result in a number of unintentional negative effects such as e.g. growth in illegal trade and cross-border trade, homemade spirits and socio-economic loss. Restrictive legislation typically leads to lack of trust and openness because the state will lose information on sale and consumption which makes it more difficult to initiate preventive measures towards vulnerable target groups.

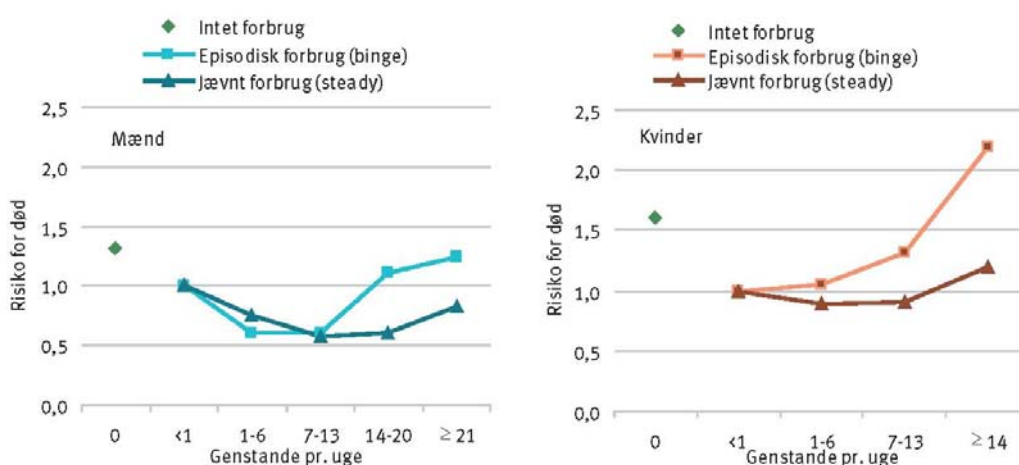
The Danish Brewers' Association does not believe that product labelling with health warnings is a suitable communication channel to prevent abuse situations. The target group is immune to this kind of communication – and a broad labelling of products does not align with the Danish Brewers' Association's idea of appropriate information to specific target groups.

Furthermore, the Danish Brewers' Association does not believe this is the right way to regulate a knowledge society. Naturally, the Danish Brewers' Association is against any abuse of beer or other alcohol consumption and it is the association's aim to support the prevention of any abuse.

Drink recommendations

The drink recommendations defined by the Danish National Board of Health are a weekly maximum of 14 drinks for women and 21 for men. This has been determined on the basis of research results by alcohol related deaths and central alcohol related diseases (Hermansen et al 2007). The recommendations represent the upper limit for alcohol consumption when not leading to possible damages. In addition to the drink limitations, the Danish National Board of Health recommend that no more than five drinks are consumed on any one occasion; also known as binge drinking (Mørch 2005). The positive effects of moderate alcohol consumption will be reduced by binge drinking.

Figure 4: Overview of the relative death risk for men and women by no consumption, episodic consumption and moderate consumption of alcohol.



Health warning labelling

Several research projects demonstrate the ineffectiveness of health warning labels where the target group is abusers of alcohol; and by this the intention of limiting alcohol abuse is not fulfilled (Hankin et al 1996). In 2000 research from Arizona State University showed that people did not drink less because of the health warnings (Malacinski 2008). On the contrary research indicates that warnings may actually increase the alcohol consumption through a 'forbidden fruit' effect (Pittman 1998).

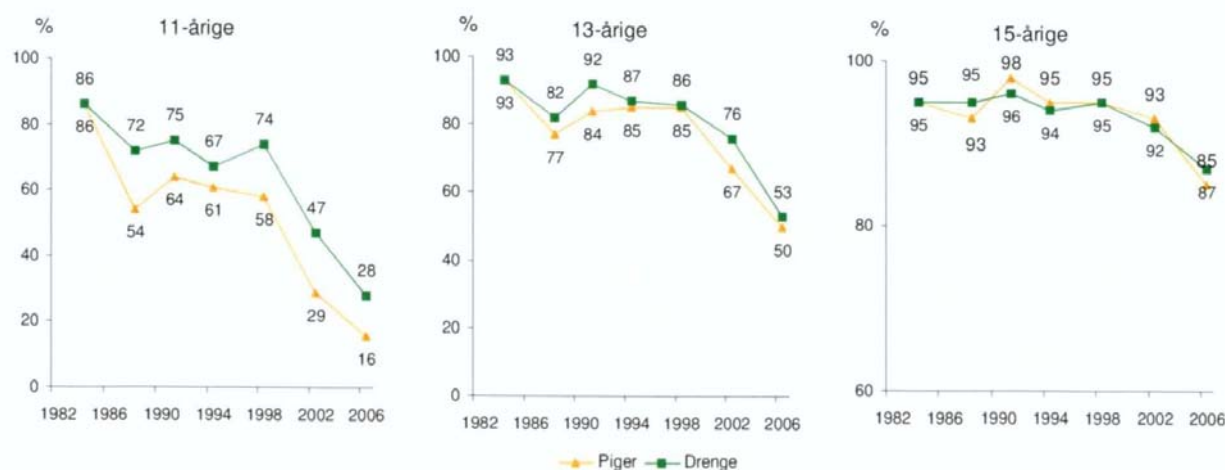
Alcohol abuse often stems from more complex situations and can be a symptom of other problems that might be social or psychosocially defined. Health warning labelling of alcohol products therefore is far too simple a solution to solve the fundamental reasons behind the abuse. Health warnings is a mass strategy aimed at the whole population, however since most people have an unproblematic and moderate consumption of alcohol, warnings are irrelevant.

Young people and alcohol

Beer can be consumed by adults but should not be consumed by children. Yet there are a large number of children and very young people who drink too much alcohol. Regardless of the reasons for this the brewing sector would like to see young people start drinking at an older age and the association is dedicated to preventing over consumption by young people. Since 1998 a sales limit of 16 years has been in effect which resulted in a 25% decrease in the number of children buying alcohol from 1998 to 2001 (Sundhedsstyrelsen 2002).

The two latest surveys on the alcohol habits of children and young people show positive changes in their relationship with alcohol (Statens Institut for Folkesundhed 2008). This positive development can be seen not only in recent research but also in statistics from the last 20 years (Rasmussen et al 2007).

Figure 5: The development from 1984 to 2006 with respectively girls and boys at the age of 11, 13 and 15 years who have tried to drink alcohol.



Among other things the surveys show that (Statens Institut for Folkesundhed 2008):

- The age at which young people start to drink alcohol has risen
- Fewer children and young people have been drunk
- Those who drink tend to consume less alcohol

Furthermore the surveys indicate that the attitude among parents and the parents' acceptance of their children's alcohol consumption influences both the age at which a child starts drinking and their alcohol consumption level. First and foremost it is the responsibility of parents to ensure appropriate drinking behaviour among their children. The influence of the parents is valid until the age of 16-20 years (Sundhedsstyrelsen 2003). Parents function as role models which is why it is vital that parents talk to their children about alcohol so that both parties are aware of their attitudes respectively.

A research project from 2005 showed that young people have an exaggerated idea of drinking, smoking, drug use and criminal behaviour among their friends of the same age. It appears that 'everybody' thinks that 'the others' are doing things which are typically only carried out by very few. An example is that young people have the impression that twice as many young people get drunk once a month than is actually supported by the statistics. In addition to this, the survey showed that simple mechanisms such as e.g. class discussions can minimise the social exaggerations (Ringstedprojektet).

Information and campaigns

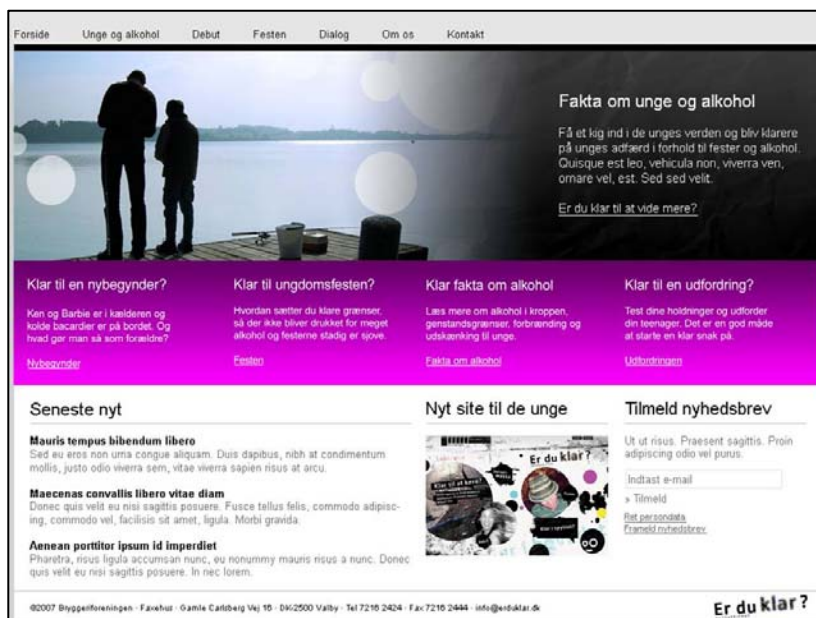
Targeted communication must ensure that messages and initiatives reach the receiver and influence the behaviour effectively with little risk of misinterpretation. Most important is the targeted dialogue aimed at vulnerable children and young people who are not able to change their health behaviour solely on the basis of public accessible information (Jensen 2002).

A holistic approach to the person's existence is necessary in the effort towards abusers of alcohol where alcohol abuse is often part of a more complex problem. Therefore it is of great importance that both prevention and treatment has its starting-point in something more than just the alcohol abuse itself and the intoxication.

In July 2008 the Danish Brewers' Association launched a concept for social responsibility; "Are you ready?" which is targeted at young people. The aim is to educate young people on appropriate alcohol culture. Parallel to this an additional concept was launched aimed at young people's parents; "Fuss-free talk" the idea being to provide parents with the necessary tools to generate dialogue and debate in the home and investigate the whole family's attitude towards appropriate alcohol culture.

The concept "Are you ready?" consists of a number of campaigns aimed at a young audience. The first campaign was held at the so called 'Green Concerts' 2008. The core message aimed at young people was "do not drink and drive". The campaign provided information on the risks connected to drunk driving. Ongoing separate campaigns containing a number of different messages will be launched as part of the "Are you ready?" concept.

The two concepts include among other things two different websites where young people and their parents can seek advice and information on alcohol and the effects of alcohol and it is possible to participate in opinion forming activities, e.g. competitions. The link between the two concepts is an online quiz about appropriate alcohol culture in which you can challenge each other. The quiz can help to open up a dialogue between the young person and their parents helping to overcome any barriers they may have in initiating this conversation themselves.



Picture 1: www.klarsnak.com. Aimed at parents.



Picture 2: www.erduklar.com. Aimed at the young people.

THE BEER CONSUMPTION

Today Danes drink less beer than they used to. Primarily this is due to a general decrease in overall alcohol consumption. However, this is also the result of an increased preference for wine during the last 30 years, inspired by the EU membership and the influence from Southern Europe. Currently the distribution of beer and wine consumption respectively is 53% and 47% in favour of beer (Bryggeriforeningen 2008). Only wine producing EU countries such as Italy and France drink more wine than the Danes.

One of the most positive benefits from the Southern European influence is a change in Danish drinking patterns. The Danes are moving from a typical Northern European culture which favours binge drinking, towards a Southern European culture where alcohol is seen as a natural accompaniment to a meal. The result is a healthier, more moderate alcohol intake (Statens Institut for Folkesundhed 2007).

The Danish Brewers' Association states

... that it is common sense to follow the drink recommendations, defined by the Danish National Board of Health: a weekly maximum of 14 drinks for women and 21 drinks for men plus the recommendation not to drink more than five drinks at any one time. By voluntarily labelling products with information on drink content the Danish Brewers' Association supports the drink recommendations as outlined by the Danish National Board of Health. Appropriate beer culture pays respect to those who do not wish to consume alcohol.

Drinking beer is not suitable for children or very young people. It is the responsibility of parents to educate their children on safe alcohol consumption. Therefore the Danish Brewers' Association supports the dialogue between young people and their parents by initiating campaigns designed to promote a delay in the age at which people start drinking and create the foundation for healthy beer drinking behaviour.

Moderate consumption of beer is unproblematic – surveys even indicate that it can benefit people's health. However, excessive consumption of beer and other alcoholic beverages among a small group of the population can be problematic. The Danish Brewers' Association is against excessive consumption and works actively to moderate any inappropriate alcohol use.

The Danes' alcohol consumption

Beer is a low alcohol drink that should be consumed moderately. Danes average alcohol consumption was relatively stable at app. 10 litres of pure alcohol a year from the beginning of 1970s to around 1995. Between 1995 and 2006 total alcohol consumption decreased by 11%.

Following Danish EU membership in 1973 wine has increasingly been represented as part of Danish alcohol consumption; this factor is the primary reason for the decrease in beer consumption, below measured in litres 100% pure alcohol per year per inhabitant (Bryggeriforeningen 2008):

- Beer consumption has decreased from 5.9 in 1980 to 4.0 in 2006
- Wine consumption has increased from 1.9 in 1980 to 3.5 in 2006
- Spirits consumption decreased until 2004 with a level of 1.1 annual litres however has increased since then to 1.4 annual litres in 2006

The Danes' total alcohol consumption is distributed as follows (Bryggeriforeningen 2008):

- Beer consumption constitutes app. 45%
- Wine consumption constitutes app. 40%
- Spirits consumption constitutes app. 15%

Overall, the Danish population is familiar with the drink recommendations both the maximum consumption and the limit for daily use, provided by the Danish National board of Health.

The distribution of alcohol consumption is irregular since it is estimated that a relatively small part of the population – around 10% – is consuming app. half of the total volume (Hermansen et al 2007). Variations in the consumption are defined among others by age, gender, social class plus according to the type of alcohol consumed.

- 90% of the female population over 16 years and 85% of the male population drink within the recommendations laid down by the Danish National Board of Health (Statens Institut for Folkesundhed 2002)
- It is estimated that app. 5% of the adult population is dependent on alcohol (Indenrigs- og Sundhedsministeriet 2002)
- In general, men tend to drink more alcohol than women

Beneficial effects from alcohol

Research into the relationship between alcohol consumption and a person's general health has revealed proven beneficial effects with regard to heart disease. Epidemic research and surveys have documented an increase of 40% to 60% in the risk of heart disease among total abstainers compared to those with a moderate daily consumption of alcohol (Astrup et al 2006).

The term 'moderate alcohol consumption' means the amount of alcohol consumed which research has found beneficial. For middle aged or older women a daily consumption of one drink is moderate, however for men a moderate consumption can be up to three drinks a day.

A beneficial effect of moderate alcohol consumption is an increase in HDL cholesterol and improved insulin sensibility. In addition, moderate alcohol consumption appears to have an effect on a number of other diseases, including e.g. type 2 diabetes, dementia and Parkinson's disease (Nedergaard 2006).

One particularly positive effect is the reduced risk of heart attacks. The risk of a heart attack is reduced by 30% to 40% with moderate daily alcohol consumption. WHO estimates that alcohol's most positive quality is the risk reduction of heart attacks (WHO Global Status Report on Alcohol 2004) – the risk reduction is similar to precaution such as e.g. keeping a normal weight through a healthy and various diet and regular exercise (Manson et al 1992).

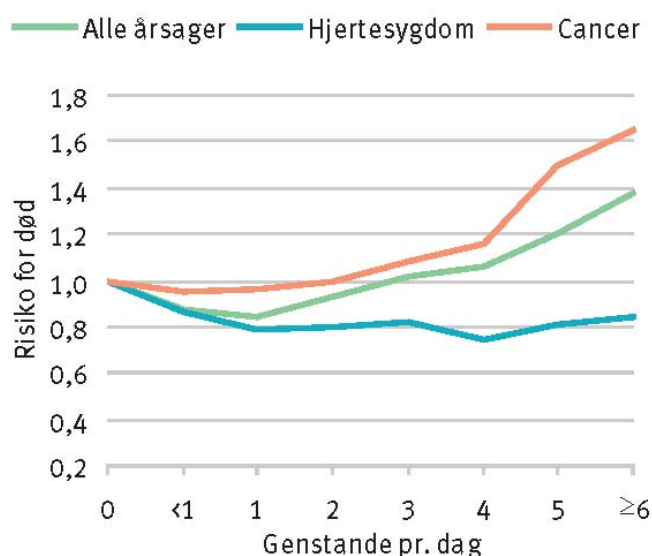


Figure 3: The connection between alcohol consumption and risk of death by respectively heart disease, cancer and 'all causes'.

A meta-analysis of 34 surveys worldwide has shown a risk reduction in early death of 18% among people with moderate daily alcohol consumption compared to those with an over consumption or total abstainers (Di Castelnuovo et al 2006).

Moderation is the key

It is a fact that the over consumption of alcohol among other things can damage the organism. The most common damage caused by over consumption is damage to the nerve system, the liver, the pancreas and the stomach. Not all damages are permanent and some can disappear with time if over consumption stops (Nedergaard 2006).

Naturally, there are individual differences in the effect of over consumption but typically damage occurs when 30% to 40% of the daily energy intake is alcohol (Nedergaard 2006). According to the Nordic Nutrition Recommendations (Nordiske Naeringsanbefalinger) daily energy intake from alcohol should not constitute more than 5% of the total energy intake (Nordic Council of Ministers 2004).

Some types of cancer are more common among abusers of alcohol; especially cancer in organs which come into direct contact with alcohol, e.g. mouth, throat and gullet. The risk is increased if the alcohol abuser also smokes (Olsen et al 1985).

The latest research shows a proven connection between women's over consumption of alcohol and an increase in the risk of developing breast cancer.

Alcohol and obesity

Obesity is a threat to the national health and can lead to a range of lifestyle diseases. Increasing numbers of Danes are registered as obese. In 2007 app. 11% to 12% of both men and women were severely obese, i.e. with a BMI index over 30 (Hermansen et al 2007).

The energy-content in alcohol products tend to vary. Beer has a lower alcohol percentage and lower energy-content than other alcoholic drinks such as wine and spirits.

	Energy kJ/kcal per 100 g	Protein per 100 g	Carbohydrate per 100 g	G alcohol per 100 g
Lager	165/39	0.3	2.6	3.7
Red wine	297/71	0.2	2.0	9.5
White wine	330/79	0.2	3.0	9.9
Dessert wine	545/130	0.3	2-10	16.5
Liqueur	1033/246	-	29	18
Spirits	1071/255	0	1	35

Table 1: Overview of energy-content and nutrition content in various alcohol products.

Research has shown that energy from alcohol does not have the same appetite regulating effect as energy from other nutrients. In other words, alcohol does not satisfy appetite which means that there is a risk of consuming more calories than are being burnt. This naturally results in weight gain (Hermansen et al 2007). Despite this, population surveys have not documented a greater tendency towards being overweight among people with moderate alcohol consumption compared to those who undertake total abstinence.

Furthermore, a controlled survey (Buemann et al 2002) has demonstrated that energy intake from beer is lower than that of wine in a scenario with ad libitum intake of alcohol and food. This implies that beer has a more advantageous effect on appetite regulation than wine. It is possible that this effect is due to the lower energy-content per volume unit in beer compared to wine, likely supplied by a more filling feeling from the carbon acid in beer.

Research on the comparison between obesity and alcohol consumption implies that daily moderate alcohol consumption is of no importance for the development of obesity (Koh-Banerjee et al 2003). However the research also documents that drinking patterns are of greater importance for the development of obesity than the actual quantity of alcohol. Volume and frequency seem to be connected with the development of obesity; increased alcohol volume can be related to risk of obesity whereas increased frequency of alcohol consumption can be related with a lower risk of obesity. Therefore it is reasonable to conclude that daily moderate consumption of alcohol is the most beneficial drinking pattern (Tolstrup et al 2005).

Beer and a healthy lifestyle

It can be assumed that moderate alcohol consumption has no negative affect on a person's nutritional status (Nedergaard 2006). Because beer is brewed from ingredients such as malted grain, hops, yeast and water the nutritional profile of beer is dependent on the quality of the selected ingredients and the brewing process. As a result nutritional content varies according to beer type and the chosen brewing process.

Compared to wine and spirits beer is a low alcohol drink with a typical alcohol content of app. 4.6% (lager beer). App. 93% of beer is water which is why beer consists of three times more water per serving than wine. The fairly large water content implies that beer has a lower energy density than wine (cf. table 1).

Beer is brewed with natural ingredients and therefore moderate beer consumption provides a number of essential vitamins and minerals needed as part of a healthy and varied diet (Bebb et al 1971). Among other things beer is a substantial source for some B vitamins, especially B2, niacin, B6 and pantoten acid with a content of more than 5% of

Recommended Daily Intake (RDI) per beer. Beer also contains folat which is necessary for cell division, transformation of amino acids and production of red blood cells. It is the brewing processes of yeast and malt that contribute to the relatively high content of B vitamins in beer.

Furthermore, beer contains a number of minerals, including among others iodine, magnesium and silica. Per beer, the content of iodine and magnesium covers app. 9% of RDI. Iodine is decisive for the thyroid's creation of metabolism hormones and magnesium is of importance for muscle and nerve functions as well as being effective in risk reduction of heart disease. Beer is a remarkably good source for silica with its content of 7 mg per beer corresponding with app. 22% of RDI. The benefit is higher mineral density in the bones (Fødevaredatabanken; Powell 2005) and research has documented silica's supplementary role in the creation and maintenance of the connective tissue.

Both wines and beer contain natural antioxidants in the shape of flavonoids; in beer the flavonoids come from humols and prenylnaringenine. The antioxidants in beer come from malt (app. 70-80%) and hops (app. 20-30%). The amount of antioxidants in beer depends on the type of beer, again depending on the ingredients and brewing process. Because of the molecular structure of the antioxidants in beer these are easily absorbed by the organism. Natural antioxidants have a positive effect on the risk of thrombosis (Pignatelli 2000).

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MARKET REGULATIONS

The Danish Brewers' Association states

... that there is no 'easy solution' when developing initiatives designed to increase the number of Danes who stay within the recommended alcohol consumption limits. Prohibitions such as age limits on the sale and serving of alcohol can be justified for dealing with children and very young people. However, further legislation beyond these limits will not solve a society's problem with alcohol.

Responsibility for children and young people's drinking habits rests primarily with their parents. However, society must also take responsibility for ensuring that vulnerable groups or individuals are not present in alcohol environments. The Danish Brewers' Association calls on the sector to take on the responsibility of self adjustment and collective ethical behaviour.

The alcohol sector must work together to ensure that all parties – e.g. restaurants and the retail business – follow legislation. It is also important that employees serving alcohol enforce the legislation and are able to deal with any possible problems which may occur when serving alcohol.

The Danish Brewers' Association does not find it credible that a regulation of tax would result in the expected changes in consumption. The average alcohol consumption has been fairly constant during shifting governments and tax systems. It is the experience of the Danish Brewers' Association that the most positive influence on the consumer and the consumption of alcohol is obtained through information and dialogue.

Self regulation rather than restrictions

Denmark's Nordic neighbours Sweden, Norway and Finland have introduced a number of limitations on the access to alcohol. However statistics from these countries show that these restrictions have not resulted in a decrease in alcohol consumption (Norström 2002). Recent research from Sweden documents that young people are being pressured to seek out the illegal market which unfortunately also covers sale of hashes and hard drugs. Experience therefore shows that people do not necessarily change their alcohol consumption due to further restrictions. One of the disadvantages caused by the introduction of further legislation and restrictions is that alcohol becomes positioned as an unnatural part of everyday life, at the same time an illegal market, cross-border trade and the production of homemade spirits is nurtured.

Taxes and price regulation

One method which is often suggested as a tool to regulate people's consumption of alcohol is higher tax. The intention of this regulation is based on the assumption that an increase in price – e.g. through a raise in tax – will automatically generate a decrease in sales and hence create a decrease in consumption. However this view does not take into consideration that the consumer might compensate for the raised price by lowering their consumption of other goods. Or put in a more precise way: Because the price of beer will rise as a result of increased taxes the Danes may not necessarily choose not to drink beer at their dinner; they may choose to go without other goods instead.

Since 1995, the official tax based sale of alcohol has been decreasing. Parallel to this the relative price of beer has fallen substantially and the standard of living as well as general consumption has increased. During this period changing governments have adjusted the level of tax on alcohol. In 2003 the tax on spirits was lowered by almost 50% however total alcohol consumption did not increase. On the contrary, alcohol consumption has been decreasing.

What the tax changes on spirits actually did change was market shares between the various types of alcohol. During 2003 consumption of spirits increased at the expense of beer and wine. Research in the tax changes' influence on alcohol consumption in Denmark concludes that consumption is not affected by tax. From this it is natural to conclude that a rise in tax cannot automatically be considered a useful tool to limit the alcohol consumption of the Danes.

In a globalised world where trade increasingly takes place across borders and where the possibility of opening international markets are constantly explored, it is an illusion to believe that one-sided tax changes in a single country can change consumer behaviour. National borders are increasingly less important to consumer's shopping habits.

Furthermore it is notable that tax often is socially skewed and tends to strike groups in society with the lowest income. This is particularly relevant when it comes to tax on beer (Skatteministeriet 2005).

The Nordic countries have the highest tax level on alcohol products in Europe. Sweden is the only country which bases its tax level on the health risk attached to alcohol. Tax and sale restrictions in Sweden are supposed to modify alcohol consumption – and the official sales are considerable lower than in Denmark (NOMESCO 1999). However the statistics do not show the massive cross-border trade and the large black market for alcohol. Smuggling and homemade spirits constitutes the black market and is estimated to make up a little less than one fifth of the total spirits consumed in Sweden. Swedish consumption

has been reliably estimated by the Swedish Center för socialvetenskaplig alkohol- och drogforskning ved Stockholms universitet, SoRAD (Center for Social Scientific Alcohol and Drug Research at University of Stockholm) and the conclusion is an annual consumption of 9.8 litres pure alcohol per inhabitant over the age of 14 years (SoRAD). Alcohol sold from Systembolaget (the Swedish Alcohol Retail Monopoly), restaurants and in supermarkets constitutes a consumption of less than 6.75 litres pure alcohol per inhabitant over the age of 14 years. The rest – more than three litres – is imported cross-border, smuggled or homemade.

In Sweden spirits represents 25% of the total alcohol consumption in comparison with the Danish market of 15% spirits (SoRAD). According to the association Sveriges Bryggeriet (Sweden's Breweries) app. 30% of the consumed beer in Sweden has not been traded through legal channels and therefore tax has not been paid to the Swedish state (SoRAD 2004).

For countries with illegal production and a large cross-border trade such as e.g. Sweden it is a challenge to monitor the population's alcohol consumption. The legal market only represents a minor part of the actual consumption which is why authorities cannot possibly draw a credible overview of the realistic alcohol consumption. When preventive initiatives are taken towards e.g. alcohol abusers or potential abusers it can therefore be difficult to target the groups sufficiently (Brewers of Europe 2004).

It can be concluded that the Swedish situation with relatively high tax on alcohol has generated a larger consumption of strong alcohol (spirits), a substantial illegal trade and a result loss in state economics and loss of control over the alcohol politics.

Much therefore indicates that consumers must be inspired and urged to change their lifestyle and possible inappropriate habits. The motivation to change lifestyle does not emerge from tax changes however but through information on the benefits from a healthier lifestyle. Tax changes in a globalised world will only move the trade to countries with cheaper goods or increase the illegal trade within borders with its highly unwanted effects.

MARKETING OF BEER

The Danish Brewers' Association states

... that the core of a competitive situation is the quest for market shares through consumer preferences – this means that bottom line marketing is aimed at moving market shares rather than expanding the volume of an existing market. In relation to alcohol products the

market shares move not only between brands but also between the various types of alcohol, e.g. beer, wine and spirits.

The marketing of alcohol products should not encourage excessive alcohol consumption or give the impression that alcohol consumption can lead to personal success; it is important to bear in mind that alcohol has a potential abuse profile. It is therefore necessary that the alcohol sector displays a great deal of responsibility both regarding the health issues of alcohol but in particular towards children and young people who must be protected against exposure to alcohol products. The Danish Brewers' Association takes part in regulating the marketing of alcohol products.

The Danish Brewers' Association has a clear objective of ongoing self regulation and responsively takes part in the prevention of alcohol abuse and promotion of appropriate moderate alcohol consumption.

Marketing and consumption

The marketing of alcohol products is frequently debated. A large international survey on marketing's effect on the total sale of beer and other alcohol clearly shows that marketing *does not* lead to an increase in sales (Mitchell 2002).

The survey compared the marketing budgets for alcohol products with the sales of this product group however no connection between the size of the budgets and volume of sales could be proven, cf. the figure below.

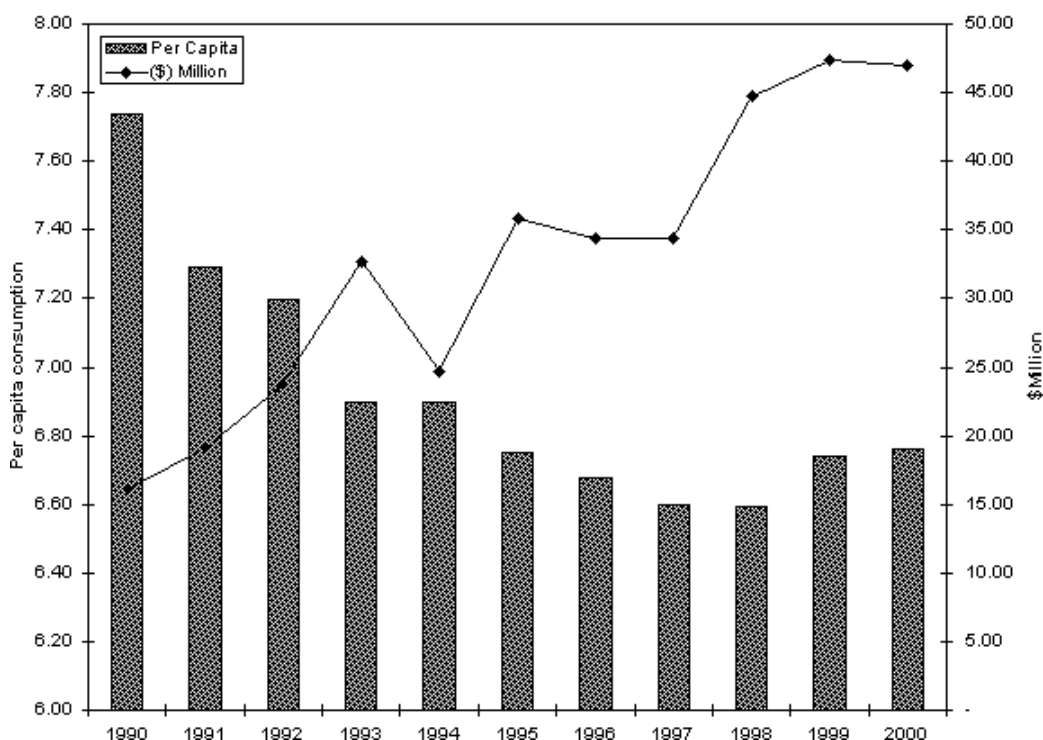


Figure 6: The connection between marketing budgets and alcohol consumption from 1990 to 2000.

Surveys of beer marketing corresponded with the above results concluding an absence of increased volume however documented that marketing can actually move market shares from one beer brand to another or from alcohol products such as wine and spirits to beer. Hence marketing is actually an internal struggle between industries in a market dominated by consumer loyalty and brand value.

Guidelines and the Alcohol Marketing Board

Marketing of alcohol products towards children and young people is regulated according to Danish Marketing Law § 1 and 8, part 2. In this it is stated that direct or indirect marketing of alcohol products towards children and young people is prohibited. Furthermore the consumer ombudsman has drafted a number of guidelines for marketing and people under age in which there is a section on marketing of alcohol products. These guidelines are a detailed repetition of the Marketing Law § 8, part 2 and serves the purpose of supporting the legislation.

In addition to this the brewery sector and the wine and spirits sector developed a set of rules back in 1999 in cooperation with among others abstinence associations, the retail business, advertising sector, the Danish Consumer Council and the Danish Ministry of Health and Business Affairs. The rules on marketing of alcohol products are more restrictive than both the national legislation and the guidelines set by the consumer ombudsman.

The set of rules is a minimum standard with the purpose of inspiring the alcohol sector to ethical behaviour with special consideration for social aspects, health risks and consumer issues connected with alcohol consumption. Furthermore children and young people are protected by a prohibition of marketing initiatives towards people under the age of 18 years.

According to this set of rules alcohol must not be marketed in a way that encourages inappropriate alcohol consumption, is provocative or gives the impression that alcohol consumption can lead to personal success.

In 2000 the Danish Ministry of Business Affairs supported the enforcement of the set of rules by the establishment of Alkoholreklamenævnet (the Alcohol Marketing Board). This board should attend the task which used to be under the jurisdiction of the consumer ombudsman however the establishment of the Alcohol Marketing Board also aimed at creating a structure which ensured that the rules had a potential of becoming an integrated

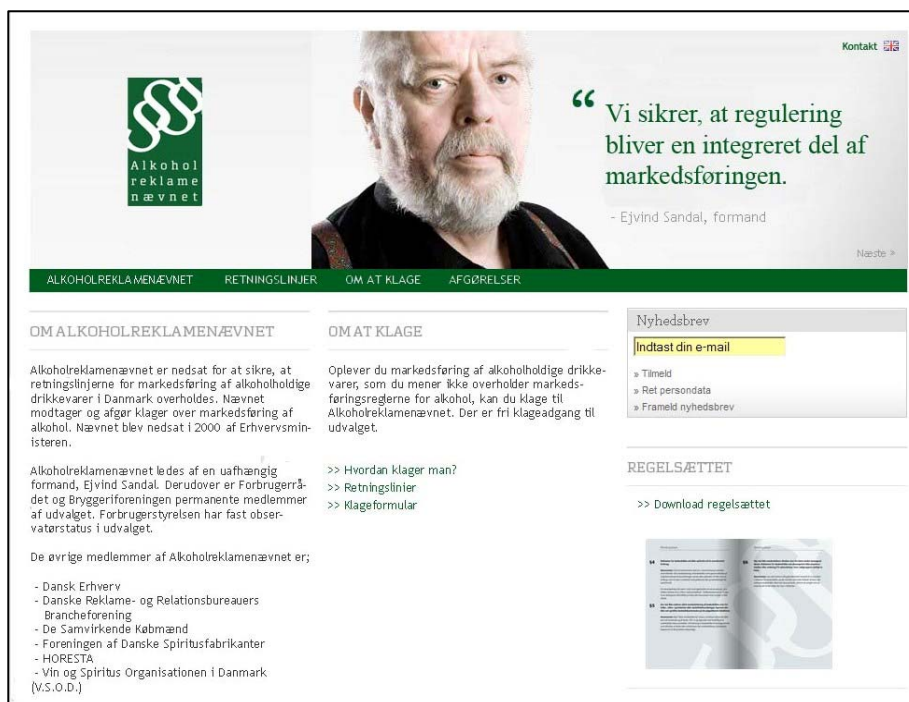
part of the alcohol sector and boost the ethical marketing behaviour.

The Alcohol Marketing Board is an example of collective regulation – defined by the attached system of enforcement and by the fact that this enforcement is actually an independent institution with interests from both the sector and the consumer side represented.

The task of the Alcohol Marketing Board is to deal with and settle in cases regarding marketing of alcohol products in Denmark. The Alcohol Marketing Board deals with all types of cases regarding marketing of alcohol products; therefore it is of no importance for the case process whether the involved parties are members of one of the associations that created the set of rules.

In the guidelines on marketing and pricing information from 2005 the consumer ombudsman pointed out that the Alcohol Marketing Board is a brilliant example of how self regulation can be executed.

In order to ensure dialogue, continuity and uniform practice representatives from business sectors that are not directly involved in the case take part in the board's meetings. The aim with this procedure is to move the somewhat predictable general attitudes of the board in a more constructive direction to help preventing future cases in the board.



Picture 3: Website for the board.

Korea Alcohol & Liquor Industry Association (KALIA) is the only association representing major alcohol manufactures in Korea. KALIA has 13 multi alcohol (mostly Spirits such as So-ju) manufacturers, 2 beer manufacturers, 3 whiskey manufacturers and 10 ethanol manufacturers as members.

One of the main objectives of KALIA is to promote responsible drinking in Korea. KALIA has conducted many activities for reducing alcohol related harm with its member companies, and of course KALIA will contribute to reduce alcohol related harm with WHO and Ministry of Health Korea.

KALIA believes that effective strategies to reduce alcohol related harm require followings

- Balanced approach considering regional circumstance, culture and drinking pattern
- Long term plan with step-by-step process
- Guarantee moderate drinkers' right and freedom to enjoy their responsible drinking

1. What are your views on effective strategies to reduce alcohol-related harm?

Balanced approach considering regional circumstance

Effective strategies must go well with its regional drinking culture and characteristic. Strategies need to be set up by all stakeholders, not by specific organization for reflecting actual regional drinking culture and circumstance.

Step by step process

Sudden strict restrictions might lead side effects.

Raising alcohol price might bring on counterfeit alcohol consumption increasing.

Limiting alcohol availability could cause theft.

Effective strategies must be promoted in step by step process with long term plan for preventing above problems.

First step for alcohol related harm strategies should be a public campaign such as publicity of benefit of moderate drinking and harm from binge drinking.

Examples of effective interventions

- a. Promoting responsible drinking
 - Responsible drinking education for underage
 - Responsible drinking campaign through advertisement, booklet, ad-poster and etc
- b. Harm reduction approach
 - Stop drink driving campaign and publicity activities
 - Harm reduction publicity activities for pregnant women
- c. Raising public awareness
 - Public awareness about alcohol and body, recommended units
 - Responsible retailing awareness such as server/retailer training

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

Strategies aimed at regional context (Not one-size-fits strategy)

One-size-fits strategy may not be effective due to cultural differences of each regions and country. WHO needs to set up direction of strategy, and detailed policies need to be set and promoted by regional government or organizations through deep debate with stakeholders.

Guarantee moderate drinkers' right

Global alcohol strategies need to guarantee moderate drinkers to keep their right and freedom to drink alcohol, because most of alcohol drinkers are moderate drinkers and they take benefits from moderate drinking.

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

KALIA has promoted various responsible drinking campaigns with its member companies which are major alcohol manufacturers in Korea.

Korea Alcohol Research Foundation

KALIA and its member companies established KARF(Korea Alcohol Research Foundation), a center for not only promoting responsible marketing but also treating and rehabilitating alcoholic, in 2000. It is the unique case that alcohol treatment and rehabilitation center is funded and operated by alcohol industry. It shows Korean alcohol industries' actual efforts and intention to reduce alcohol related harm.

Participating national alcohol policy activity by Ministry of health

KALIA also has actively participated in 'Blue Bird Forum', promoted by Ministry for Health, Welfare and Family affairs for reducing alcohol related harms in Korea with other stakeholders such as public health, government official, alcohol retailer, researcher, AAA, NGO.

KALIA and its member companies will continually promote responsible drinking campaign and cooperate with Ministry for Health, Welfare and Family affairs and other stakeholders to reduce alcohol related harm.

Cerveceros Latinoamericanos

Audiencia pública sobre la reducción del uso nocivo del alcohol

Cerveceros Latinoamericanos agradece poder contribuir con la solicitud de la Asamblea Mundial de la Salud (AMS) a la Directora General, Resolución WHA.61.4 ¹ de preparar un proyecto de estrategia global para reducir el uso nocivo del alcohol. El diálogo y la cooperación entre los sectores interesados en contribuir a reducir el uso nocivo son fundamentales, tanto para comprender mejor un problema de alta complejidad, como para diseñar estrategias apropiadas para reducirlo.

La AMS mostró en dicha resolución la importancia que le asigna a considerar los diferentes contextos nacionales, religiosos y culturales, así como los recursos y capacidades de los diferentes Estados Miembro y los múltiples sectores que pueden contribuir al logro del objetivo planteado. Cerveceros Latinoamericanos se considera uno de ellos, forma parte de la solución al problema del consumo nocivo de alcohol y está trabajando en áreas concretas para contribuir a su reducción.

1. Sobre estrategias eficaces para reducir los daños relacionados con el alcohol.

Las estrategias costo-eficientes son las que se proponen reducir patrones de consumo perjudiciales, que sean evaluables y tomen en consideración las diferencias de contexto señaladas por la OMS. Estas diferencias generan patrones de consumo de alcohol, que pueden variar sustancialmente entre regiones, segmentos sociales, tipos de bebidas y culturas, y cuyas causas y motivaciones también tienen diversos orígenes. Por lo tanto, las políticas e intervenciones costo-eficientes no pueden ser globales, sino diseñadas de acuerdo a las circunstancias específicas a resolver.

Estas estrategias pierden su eficacia en entornos de alta regulación, pero débiles en la aplicación de la ley. Esto favorece la existencia de organizaciones delictivas que han venido contribuyendo a generar altas tasas de consumo de alcohol no registrado en Latinoamérica.

Las estrategias deben basarse en evidencia científica proveniente de las regiones y países. Estas son insuficientes en América Latina y en otras regiones. Como señala el documento *Alcohol in Europe* ² : “La base de evidencia todavía está ampliamente dominada por estudios de Norteamérica, el norte de Europa y Australia y Nueva Zelanda.” Y, como señala el mismo documento en una de sus conclusiones: “Una base de investigación firme es un prerrequisito para políticas y acciones sobre el alcohol”. ³

La meta debe ser cambiar los patrones de consumo nocivos para el individuo y para la sociedad. Este cambio debe descansar, primero, en un incremento del nivel de información de la

¹ 61a. Asamblea Mundial de la Salud, WHA61.4, *Estrategias para reducir el uso nocivo del alcohol*, 2008.

² Anderson, P. & Baumberg B., *Alcohol in Europe: A public health perspective*, Institute of Alcohol Studies, 2006.

³ Op cit, pag. 403.

población sobre el significado y consecuencias de este tipo de consumo; y segundo, esta información debe, a su vez, basarse en evidencia y ser comunicada de manera que garantice su credibilidad y contribuya a motivar al consumidor hacia el cambio de conducta.

Cerveceros Latinoamericanos patrocina una investigación de alcance regional sobre los patrones de consumo de alcohol y el consumo nocivo en estos países. Esta investigación, pionera en su alcance, la realiza la Facultad Latinoamericana de Ciencias Sociales (FLACSO), organismo internacional de carácter autónomo y regional. Con base en esta evidencia se podrán hacer recomendaciones de estrategias más ajustadas a la realidad local y con mayores probabilidades de éxito.

Nuestra posición ante la importancia de los patrones de consumo descansa tanto en nuestro propio conocimiento de la región, como en recomendaciones formuladas por la misma OMS: *“Los patrones de bebida entre naciones o culturas son extremadamente importantes. A mayor cantidad de conocimiento que se pueda obtener sobre los patrones de bebida, así como del consumo per capita, mayor la precisión con que se podrán diseñar políticas para reducir el daño relacionado con el alcohol”.*⁴

Otro documento de la OMS señala: *“Entre aquellos que consumen alcohol, el espectro de uso puede variar de uso ocasional, uso riesgoso, uso nocivo (también llamado uso problemático o abuso del alcohol) hasta la dependencia. La proporción de diferentes grupos en este espectro varía considerablemente entre diferentes sociedades y hay diferencias aún dentro de cada país individual / un área geográfica específica”.*⁵

En síntesis, nuestra propuesta sobre estrategias eficaces para reducir los daños relacionados con el consumo nocivo de alcohol implica que:

- 1.1 Estén dirigidas al consumo nocivo y no al consumo en general.
- 1.2 Estén enfocadas al cambio de patrones de consumo nocivo; por ejemplo, accidentes, consumo de menores o violencia.
- 1.3 Estén basadas en conocimiento científico sobre los patrones de consumo, sus motivaciones, intencionalidad, ocasiones y consecuencias.
- 1.4 Sus efectos sean evaluables.
- 1.5 Sean aplicables en situaciones puntuales y momentos críticos con base en información estadística confiable.
- 1.6 Promueva el cambio de patrones nocivos con una sociedad bien informada sobre las consecuencias de ese tipo de consumo, motivada adecuadamente para cambiar y con aplicación

⁴ WHO: *International Guide for Monitoring Alcohol Consumption and Related Harm*, 2000.

⁵ WHO: Regional Office for South-East Asia, *Reducing Harm from Use of Alcohol: Community Responses*, 2006

de la ley.

1.7 Promuevan la cooperación entre todos los sectores involucrados – gobiernos, sociedad civil, centros académicos y de investigación y la industria del alcohol - incluyendo el compartir las experiencias exitosas.

1.8 Que permita hacer ajustes locales con base en la evaluación y el aprendizaje obtenido.

Lo anterior está en contraposición con una estrategia basada exclusivamente en políticas restrictivas y prohibicionistas.

Adicionalmente, la cerveza tiene la posibilidad de ofrecer un amplio portafolio de productos con diferente gradación alcohólica que va desde la cerveza sin alcohol.

Un aspecto muy importante para la reducción de los daños relacionados con el alcohol lo constituye el alcohol ilícito, cuyas consecuencias sobre la salud y la sociedad revisten niveles graves en algunas regiones. La producción y consumo de ese tipo de alcohol están incentivados por las altas restricciones e impuestos al alcohol legal en un entorno de débil aplicación de la ley. En Latinoamérica la proporción de alcohol ilícito alcanza niveles considerables. Las estrategias dirigidas a controlar la oferta legal conducen hacia el alcohol ilícito y no logran el objetivo previsto; por el contrario, se afecta gravemente la salud pública y resultan más costosas para el Estado.

Algunos problemas que se derivan del uso inapropiado del alcohol pueden y deben ser atendidos por el sector gubernamental, con la participación de otros sectores de la sociedad, incluyendo los actores económicos. Estos problemas son el:

- consumo de alcohol por menores;
- consumo de alcohol por embarazadas;
- conducir vehículos habiendo consumido alcohol;
- consumo de alcohol concurrente con algunas enfermedades.

Entre las intervenciones dirigidas a prevenir el consumo en estas situaciones se encuentran:

- El establecimiento y aplicación de límites de alcohol en la sangre de quienes conducen vehículos.
- Programas educativos dirigidos a jóvenes y mujeres en edad reproductiva que informen sobre los efectos del alcohol en sus circunstancias particulares.
- Programas dirigidos a pediatras y obstetras, así como a médicos generales, que contribuyan a actualizar sus conocimientos sobre los efectos del alcohol en los sectores en riesgo.
- Códigos de autorregulación en mercadeo, publicidad y ventas por parte de la industria de

bebidas alcohólicas que contribuyan eficazmente a reducir el consumo por parte de las poblaciones en riesgo. Esta estrategia está siendo exitosamente aplicada en otras regiones y países. Sin embargo, es necesario evaluar sus resultados en Latinoamérica y perfeccionar los mecanismos de resolución de controversias. La mayor parte de la industria cervecera de la Región ha adoptado estos códigos y los aplica.

- Programas educativos dirigidos a padres, maestros y comunidades que informen sobre los efectos del consumo de alcohol por menores y que promuevan patrones de consumo responsable en los adultos y los involucren en esta promoción. La investigación reciente muestra claros avances en este tipo de intervenciones basadas en evidencia y en la calidad de la investigación de resultados.⁶

- Programas de comunicación dirigidos a la población en general que contribuyan a modificar patrones de consumo nocivo.

Estas iniciativas deben ser evaluadas y medido su impacto en las poblaciones a que van dirigidas. Previa identificación de los aspectos a evaluar, se debe tomar en cuenta, tanto los objetivos a largo plazo, como los de corto plazo, que representan la base para el logro de los primeros y su sostenibilidad en el tiempo. La evaluación y medición de impacto deben ser realizadas de manera independiente y sus resultados presentados públicamente. En Cerveceros Latinoamericanos estamos comprometidos con este planteamiento y así se está aplicando en los diferentes programas que actualmente adelantan las empresas cerveceras de la región.

Estamos comprometidos a asignar recursos y a participar activamente con otros sectores involucrados en la reducción del consumo nocivo del alcohol en general, y en particular a contribuir a evitar el consumo por aquellos que son especialmente vulnerables a los efectos del alcohol dado su edad y circunstancias particulares.

Entendemos que esto implica un esfuerzo sostenido y de largo plazo que debe involucrar a la sociedad como un todo, con metas precisas en el tiempo, tanto de proceso como de alcance. Cerveceros Latinoamericanos ha iniciado este camino, acumulando aprendizajes y somos optimistas respecto a sus posibilidades ya que ello también se relaciona con la sostenibilidad de nuestras empresas.

2. Sobre el mejor modo de reducir los problemas relacionados con el uso nocivo del alcohol desde una perspectiva global.

Una perspectiva “global” debe ver el problema del uso nocivo del alcohol dentro del contexto de las diferentes realidades culturales, sociales y económicas de los diferentes países y regiones. Una estrategia única puede incrementar los costos gubernamentales en su aplicación y no alcanzar su objetivo en algunos países, aún siendo costo-eficientes en otros. En el caso de la promoción de estilos de vida saludables, se ha encontrado que estos son el resultado de una

⁶ Richard Spoth, Mark Greenberg, Robert Turrissi: *Preventive interventions addressing underage drinking: state of the evidence and steps toward public health impact*, Pediatrics, 2008 Apr; 121 Sup. 4.

combinación de: recursos, patrones de comportamiento individual, patrones de comportamiento colectivo y probabilidad de correspondencia entre estos elementos.⁷

3. Modos en que Cerveceros Latinoamericanos contribuye a reducir el uso nocivo del alcohol.

3.1 Estamos comprometidos a asignar recursos y a participar activamente con otros sectores involucrados en la reducción del consumo nocivo de alcohol.

3.2 Patrocina investigación sobre patrones de consumo en la Región Latinoamericana que realiza FLACSO.

3.3 Ha establecido un código de autorregulación y la mayoría de las empresas cerveceras latinoamericanas han establecido y aplican sus propios códigos.

3.4 La industria cervecera latinoamericana ha desarrollado e implementado estrategias para contribuir a evitar la venta de sus productos a menores. Estas estrategias están orientadas a su estructura de ventas, a expendios y público en general.

3.5 Muchas de nuestras empresas han desarrollado programas dirigidos a la prevención del consumo de alcohol por menores. La evaluación que se está haciendo de estos programas muestra resultados alentadores. Programas de este tipo están en funcionamiento en Argentina, Brasil, Colombia, Costa Rica, Chile, México, Venezuela.

3.6 En varios países latinoamericanos (Argentina, Brasil, Colombia, Costa Rica, Chile, México, Nicaragua) se aplican programas dirigidos a padres de familia y educadores utilizando material impreso y charlas con el objetivo de facilitar la comunicación con los menores sobre los efectos del alcohol y contribuir a prevenir su uso. En México y Costa Rica los programas cuentan con el respaldo del sector gubernamental.

3.7 Varias empresas cerveceras latinoamericanas trabajan en alianza con ONGs en la realización de estudios que permitan conocer mejor la realidad del consumo de alcohol en sus respectivos países o para desarrollar programas preventivos. Este es el caso de SAB Miller (Bavaria) en Colombia con Nuevos Rumbos; de la Cámara Venezolana de Fabricantes de Cerveza con la Universidad Católica Andrés Bello y en México Cervecería Cuauhtémoc con la Universidad de Monterrey.

3.8 En Brasil, AmBev y otras empresas y organizaciones de la sociedad civil, financian el Centro de Información sobre Salud y Alcohol (CISA), ente independiente que contribuye a la difusión del conocimiento científico sobre este tema.

⁷ Rütten, A.: *The implementation of health promotion: A new structural perspective*, Social Science & Medicine, Volume 41, Issue 12, December 1995, Pages 1627-1637).

Latin-American Brewers (Cerveceros Latinoamericanos)

Public audience about the reduction of harmful use of alcohol

Cerveceros Latinoamericanos appreciates the opportunity of contributing to the request made by the World Health Assembly (WHA) to the General Director on its Resolution WHA.61.4 ¹ regarding the development of a draft global strategy to reduce harmful use of alcohol. We believe crucial that conversations and cooperation among all stakeholders take place, both to understand a very complex problem, and to ensure effective, sustainable approaches and public policies.

On its resolution, the WHA stated the importance of taking into account different national, religious and cultural contexts, as well as the resources, capacities and capabilities of Member States and other stakeholders which could contribute to the achievement of the goals. Cerveceros Latinoamericanos is proud to be considered an active part of the solution to the problem of harmful use of alcohol and is already working on concrete issues and interventions.

1. About efficient strategies to reduce harmful use of alcohol.

Reasonable, cost-efficient strategies should take into account the different patterns and contexts of consumption addressed by the WHO, and should be subjected to evaluation and monitoring. These differences generate drinking patterns which can vary substantially among regions, social strata, types of beverages and cultures and whose causes and motivations can also have diverse origins. This implies that they should not be global but designed to target the very specific circumstances they are trying to solve.

These strategies loose efficacy in highly regulated environments which are weak in law enforcement. This helps the development of illegal organizations which have been contributing to develop high rates of unrecorded alcohol consumption in Latin-American.

The strategies must be based on robust scientific evidence coming from the various regions and countries. Unfortunately, these are insufficient in Latin America and other regions. As it is mentioned in the document *Alcohol in Europe* ² "The evidence base is still largely dominated by studies from North America, Northern Europe, Australia and New Zealand." And, as the same document states in one of its conclusions: "A firm research base is a pre-requisite for alcohol policies and actions". ³

Our goal must aim to change the harmful consumption patterns that affect individuals and society as a whole. This change must dwell on increasing the population's level of information about the risks and consequences of harmful consumption, by using sound scientific evidence communicated in a credible form that motivates consumers to take action.

¹ 61a. World Health Assembly, WHA61.4, *Strategies to reducing alcohol harmful consumption*, 2008.

² Anderson, P. & Baumberg B., *Alcohol in Europe: A public health perspective*, Institute of Alcohol Studies, 2006.

³ Op cit, pp. 403.

For this reason, Cerveceros Latinoamericanos is financing a regional research about alcohol consumption patterns and harmful use of alcohol. This scientific study has been assigned to the Facultad Latinoamericana de Ciencias Sociales (FLACSO) which is an autonomous international and regional organism. Based on this evidence, it will be possible to recommend more accurate strategies and develop more effective policies which consider local drinking contexts and patterns.

Our position about the importance of consumption patterns relies on our own knowledge of the region, as well as on the recommendations of the WHO itself: *"Patterns of drinking within nations or cultures are extremely important. The more knowledge that can be gleaned regarding drinking patterns, as well as per capita consumption, the more accurately policies may be designed to reduce alcohol-related harm"*.⁴

Another WHO document states: *"Amongst those who consume alcohol, the spectrum of use can range from occasional use, hazardous use, harmful use (also called problematic use or alcohol abuse) to dependence. The proportion of different groups of this spectrum varies considerably among different societies and there are differences even within each individual country / a specific geographical area"*.⁵

In summary, our proposal about efficient strategies to reduce harmful use of alcohol implies that these strategies:

- 1.1 are aimed to harmful use and not general use of alcohol;
- 1.2 are focused on changing harmful consumption patterns in specific ways; for instance, accidents, violence, or under age consumption;
- 1.3 are based on robust and sufficient scientific knowledge about consumption patterns, their motivation, intentions, causes and consequences;
- 1.4 are subject to evaluation;
- 1.5 are applicable in specific situations, in critical times;
- 1.6 promote the change of harmful patterns within a society that is well informed about the consequences of that type of consumption and that is also motivated to change and enforce alcohol regulations;
- 1.7 promote cooperation among all sectors and stakeholders – governments, civil society, academic and research centers, alcohol industry – and that the successful experiences are shared;
- 1.8 allow local adjustments based on the resulting evaluation and experience.

⁴ WHO: *International Guide for Monitoring Alcohol Consumption and Related Harm*, 2000.

⁵ WHO: Regional Office for South-East Asia, *Reducing Harm from Use of Alcohol: Community Responses*, 2006

The above is in contrast with a strategy based exclusively on restrictive and prohibitionist policies.

In addition, beer has the possibility to offer a wide product portfolio with different alcohol content from zero alcohol on.

A very important aspect to reduce alcohol-related damages is unrecorded alcohol; its consequences on health and society reach severe levels in some regions. The high restrictions and taxes on legal alcohol, along with the environment of weak law enforcement, encourage illegal alcohol production and consumption. In Latin-America, the amount of illegal alcohol reaches considerable high levels in some countries. The strategies aimed at controlling the legal offer encourage illegal alcohol and do not achieve its objectives; on the contrary, public health gets severely affected, which results in higher expenses to the nation.

Some problems caused by the inappropriate use of alcohol can and must be solved by the governmental sector, along with the participation of other stakeholders, including the industry. These problems are:

- Consumption during childhood and youth;
- Consumption during pregnancy;
- Consumption before or while driving;
- Regular consumption while having some diseases or being ill.

Among the possible ways to prevent alcohol consumption in these situations, we have:

- Establishing and enforcing limited-blood-alcohol-level regulations for drivers.
- Programs aimed at under-age people and pregnant women which inform about the risks of alcohol consumption in their particular circumstances, and guide them towards informed, responsible decisions.
- Programs aimed at pediatricians and obstetricians, as well as specialists in general fields of medicine, which contribute to updating their knowledge about the effects of alcohol on populations at risk.
- Self regulation codes on the alcoholic drinks industry, commercial communications, advertising and sales, which contribute effectively to the reduction of consumption in populations at risk. This strategy is being successfully implemented in many regions and countries. However, it is necessary to evaluate the results in Latin-America and to improve mechanisms of handling controversies.
- Educational programs aimed at parents, teachers and communities, which inform about the effects of under age alcohol consumption, promote responsible drinking patterns by adults and involve them in this strategy. Recent investigation shows clear advances in this kind of

strategies, based on evidence and on the quality of this research.⁶

- Communication programs, aimed at the population as a whole, that contribute to change harmful consumption patterns.

All these initiatives must be evaluated and their impact on the populations must be measured. They must be developed with clear performance and impact indicators as well as short and long term objectives to facilitate their monitoring and sustainability. The evaluation and measurement of the impact must be conducted independently and the results must be publicly available for evidence-based knowledge. In Cerveceros Latinoamericanos we are committed to this statement as we have actually followed and supported the different programs implemented by the brewing companies of the region.

We are committed to assign resources and to participate actively along with other stakeholders to reduce harmful use of alcohol in general and, in particular, to contribute to avoid drinking by those who are particularly at risk due to their age or particular circumstances.

We understand that this implies a sustained and long-term effort which should include society as a whole and with precise time-specific goals, both in process and reach. Cerveceros Latinoamericanos has initiated this journey, accumulating learnings and we are optimistic about its possibilities.

2. About best ways to reduce problems related to harmful use of alcohol from a global perspective.

A "global" perspective should see the problem of harmful use of alcohol within the context of the different cultural, social and economic realities of all the different countries and regions. A single strategy could increase the governmental expenses and, even though it could be cost-efficient in some countries, it might not achieve its purpose in some others. For instance, in the case of the promotion of healthy lifestyles, it has been proven that such lifestyles are the result of a combination of situations: resources, patterns of individual behavior, patterns of collective behavior and the probability of correspondence between resources, patterns of individual behavior and patterns of collective behavior.⁷

3. How Latin-American Brewers contributes to reducing harmful use of alcohol.

3.1 We are committed to assign resources and to participate actively along with other stakeholders in the reduction of harmful alcohol use.

⁶ Richard Spoth, Mark Greenberg, Robert Turrissi: *Preventive interventions addressing underage drinking: state of the evidence and steps toward public health impact*, Pediatrics, 2008 Apr; 121 Sup. 4.

⁷ Rütten, A.: *The implementation of health promotion: A new structural perspective*, Social Science & Medicine, Volume 41, Issue 12, December 1995, Pages 1627-1637).

3.2 By financing research by FLACSO on Latin-America consumption patterns and harmful patterns and motivations.

3.3 By establishing self regulation codes, and promoting their success to prevent harmful patterns of drinking. Most Latin American brewing companies have established and enforce their own codes.

3.4 Latin-American brewers have developed and implemented their own strategies to stop selling their products and prevent others from selling them to minors. These strategies are aimed at their own selling structures, at the retail selling sectors and at consumers in general.

3.5 Many of our members have developed programs to prevent under age alcohol consumption and assertive decision making for young people. The independent evaluations of these programs show very encouraging results. Argentina, Brazil, Colombia, Costa Rica, Chile, Mexico and Venezuela have already implemented this kind of programs.

3.6 Also, in several Latin-America countries (Argentina, Brazil, Colombia, Costa Rica, Chile, Mexico, Nicaragua,) some programs aimed at parents and teachers are being implemented. They use printed materials and educational talks in order to facilitate communication with young people, teach them about the effects of alcohol and contribute to reduce its consumption. In Mexico and Costa Rica the programs count with the support of the governmental sector.

3.7 Several Latin-America brewing industries work together with NGOs, with the purpose of researching and studying the reality of alcohol consumption in their countries, establishing workshops for parents, and understanding the most accurate public policy alternatives. The following are some of these cases: SAB Miller (Bavaria) in Colombia with Nuevos Rumbos, the Venezuelan Brewers Association with Universidad Católica Andrés Bello and Cerverceria Cuauhtémoc in Mexico with Universidad de Monterrey.

3.8 In Brazil, AmBev, along with other companies and civil society organizations, are financing the Centro de Informação sobre Saúde e Alcool (CISA), an independent organization that contributes to the spreading of scientific knowledge, research activities and prevention programs on alcohol and health. CISA has developed several materials and programs to prevent under age alcohol consumption and promote responsible consumption.

CONCEPT

Reactie STIVA op WHO consultatie 2008

Stichting Verantwoord Alcoholgebruik (Foundation for Responsible Alcohol Consumption), STIVA, is the Dutch Social Aspect Organization which encourages people to consume alcohol, when they choose to do so, in a responsible manner. United in STIVA are the Dutch producers and importers of beer, wine and distilled spirits. In order to achieve this goal STIVA created in 1981 the Advertising Code for Alcoholic Beverages. All alcohol producing and importing companies have the obligation to respect this Code. If not, they are forced by STIVA to adjust their TV- and radio advertisements through a so-called pre-vetting system. The official enforcement of the Advertising Code for Alcoholic beverages is in the hands of the Dutch Advertising Code Authority (Reclame Code Commissie, www.reclamecode.nl).

STIVA is also the partner of stakeholders in the Netherlands who are willing to contribute in a constructive manner to fight alcohol abuse. Topics such as alcohol and youth and alcohol and traffic participation are high on the political agenda in the Netherlands. STIVA, for example, is one of seven partners in the workgroup 'Alcohol & Youth', which is chaired by the Ministry of Health,

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

Treat the alcohol industry as a partner.

A lot of SAO's, but also individual companies, have an economic interest in behaving as a constructive partner on international, national and local level. Use their strength in public-private partnership.

Know the problem and take pragmatic measures

There is a difference between normal alcohol consumption and alcohol abuse¹. Alcohol abuse correlates with personal and psychological backgrounds, socio-economic background, expectancy, peer groups, etc. It is necessary that measures to discourage alcohol abuse are specific, tailor-made if you like. They should address the specific backgrounds mentioned above. On the other hand there should be strict enforcement on all general legal restrictions, such as drunk driving and infringements of the legal purchasing age.

Emphasize on pragmatic solutions

Focus on those solutions that are pragmatic and close to home. Don't invent new programs or measures, but bring together all kinds of initiatives from those stakeholders who are willing to work together, a best practices approach.

Question 2: From a global perspective, what are the best ways to reduce problems

¹ In some situations alcohol consumption is being discouraged entirely: under the age of 16, before driving a motorvehicle, during pregnancy, before (or during) sports, during work etc.

related to harmful use of alcohol?

Bring ideas together. The EU Alcohol and Health Forum is a good example of how this can be done. It does not only create a platform to share international and national ideas and actions, but also creates a ‘buzz’ to do something against the abuse of alcohol. It will certainly increase the insight in what actions will have effect and under which circumstances. A similar approach on a global scale may be considered by the WHO.

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

1. By enforcing our national Advertising Code for Alcoholic beverages; by advising the alcohol industry how to uphold this Code both by; by giving training to marketing departments.
www.alcoholcode.nl (website dedicated to informing ‘users’ of the code),
www.stiva.nl
2. By using our slogan: Alcohol onder de 16, natuurlijk niet (Alcohol under 16, certainly not) Still a lot of parents in the Netherlands are not aware of the legal purchasing age of 16 years and moreover if they do know the LPA they don’t think it’s necessary to be strict on their children. The slogan is shown in every television advert from producers and importers for alcoholic beverages and in printed advertising for alcoholic beverages with less than 15% abv. There is also a website supporting the slogan: www.alcoholonderde16natuurlijkniel.nl
3. By funding a campaign in retail called: “Drank kopen kent zijn leeftijd”. (Buying alcohol means knowing the legal purchasing age).
www.pvad.nl
4. By participating in the Dutch catering industry campaign: “Eerst denken, dan schenken”. (Think before you serve).
5. By participating intensively in the Dutch designated driver campaign called BOB. STIVA together with the Dutch Ministry of Traffic and Veilig Verkeer Nederland (Road Safety Organisation) started a successful campaign in 2001, based on the Belgian example. We also work together with the Dutch police and a Road Safety think-tank for young people called Team Alert.
www.veiligverkeernederland.nl, www.jebenttopbob.nl , www.teamalert.nl
6. By putting the message across that people of a legal drinking age should only drink moderately. This is a very old and well known STIVA slogan in the Netherlands called: “Geniet, maar drink met mate”. (Enjoy, but drink moderately). It is shown in every television advert or print ad for alcoholic beverages with 15% ABV or more.
www.genietmaardrinkmetmate.nl
7. By creating a website to help parents to communicate with their children on subjects relating to alcohol, such as legal purchasing age, when not to drink, information on alcoholic beverages, etc. STIVA has started this initiative in the Netherlands.
www.pratenoveralcohol.nl

There are a lot of other initiatives by companies who operate in the Netherlands, such as Heineken, Grolsch/SAB Miller, Diageo Netherlands, Bacardi-Martini Netherlands, Inbev Netherlands, etc. If necessary STIVA advises these companies. Fortunately they are very capable and create their own initiatives on Social and Corporate Responsibility.

Moreover, STIVA talks to and works together with a lot of other stakeholders in the Netherlands, such as:

- the Ministry of Health
- Dutch Catering Association (KHN)
- Dutch Retail Association (CBL/PVAD)
- National Sports and Olympic Board (NOC*NSF)
- Association of Municipalities (VNG)
- Ministry of Justice
- National Center on Health and Addiction (Trimbos Instituut)
- Brewers of Holland (CBK)
- Producers and Importers of Spirits (VIP/CG-PD)
- Importers of Wine (Productschap Wijn/KVNW)
- Dutch Advertising Code Authority (Stichting Reclame Code)

As a result of these contacts, we are participating in the national 'Workgroup on Alcohol & Youth' with a lot of these organizations. There is already a report of all the national initiatives that we took until 2006. This report has been sent to the Dutch Parliament by the Minister of Health. At the moment we're putting together an update. We're trying to create a recognizable campaign, accompanied by a logo in order to make more visible and tangible to youth, parents, professionals in both sport clubs, bars and schools that drinking alcohol under the age of 16 is a bad idea.

Comisión para la Industria de Vinos y Licores de México

Contribución escrita para la elaboración de la Estrategia Mundial para Reducir el Uso Nocivo del Alcohol.

Introducción

La Comisión para la Industria de Vinos y Licores (CIVyL) es una Asociación Civil que agrupa a ocho de las principales empresas productoras y/o comercializadoras de vinos y licores de México, a saber: Barcardí y Cia., Beam Global Spirits & Wine, Brown Forman, Casa Cuervo, Casa Pedro Domecq Pernod Ricard), Diageo, La Madrileña y Moët Hennessy de México.

Las empresas asociadas a CIVyL están conscientes de la importancia que tiene la elaboración de una estrategia mundial para reducir el uso nocivo del alcohol y apoya el contenido de la Resolución 61.4 de la Asamblea de la Organización Mundial de Salud (OMS).

CIVyL entiende y comparte que la elaboración de la estrategia mundial para reducir el uso nocivo del alcohol es un ejercicio complejo que debe basarse en toda la evidencia disponible y las prácticas óptimas existentes e incorporar las opciones normativas pertinentes, teniendo en cuenta los diferentes contextos nacionales, religiosos y culturales, incluidos los problemas, las necesidades y las prioridades nacionales de la salud pública y las diferencias de recursos, capacidades y medios de los Estados Miembros de la OMS.

Consideraciones

En este contexto, y a partir de la experiencia de México, CIVyL considera que para reducir el uso nocivo del alcohol es necesario eliminar, o cuando menos reducir sustancialmente, el mercado informal de bebidas con contenido de alcohol y la producción que lo sostiene.

La existencia del mercado informal es un factor que contribuye fuertemente al uso nocivo del alcohol. Dicho mercado, por definición, está fuera de todo control o regulación por parte de las autoridades y de la sociedad en su conjunto. Cualesquiera que sean las políticas y medidas que se apliquen para reducir el uso nocivo del alcohol, éstas tendrán un efecto nulo y, en ocasiones contrario, sobre el mercado informal.

Por definición, el mercado informal no está sujeto a los impuestos, las normas sanitarias de calidad, las regulaciones en materia de publicidad o las restricciones en puntos de venta basadas en la edad de los consumidores (no venta a menores), los lugares, días y horarios de venta y de consumo, u otros criterios similares. Por el contrario, en ocasiones las medidas que se aplican a las bebidas con contenido de alcohol formales, crean un incentivo adicional para el desarrollo del mercado informal.

La magnitud del mercado irregular de bebidas con contenido de alcohol en México sigue siendo muy alta. Según un estudio de la Universidad de Guadalajara (UdeG) la tasa de evasión fiscal en el rubro de bebidas alcohólicas en 2003 alcanzó la cantidad de 38.03 por ciento.

Un estudio mas reciente de “Harbor Intelligence” confirma los resultados de la UdG pero con datos del 2006. Ambos estudios permiten afirmar que el mercado irregular de bebidas alcohólicas en México representa alrededor del 40 por ciento del consumo total de estos productos.

Las autoridades han tratado durante años de combatir la existencia del mercado informal rastreando la producción clandestina de alcohol, las instalaciones en donde se producen las bebidas alcohólicas adulteradas, los canales informales de distribución, la evasión fiscal y los puntos de venta al consumidor final. Sin embargo, como lo demuestran los estudios antes mencionados, todas estas medidas no han sido suficientes para reducir el tamaño del mercado informal. Es mas, según ambos estudios, el mercado informal ha aumentado durante los periodos analizados.

Para combatir eficaz y eficientemente la existencia y desarrollo del mercado informal es necesario ir a la raíz del problema; es decir, a la ganancia ilícita que obtienen los productores informales de bebidas con contenido de alcohol al utilizar insumos muy baratos de baja calidad y dudosa procedencia y, sobre todo, al evadir el pago de impuestos.

De acuerdo con un estudio del Instituto Tecnológico Autónomo de México (ITAM), el diferencial de precios entre el mercado formal y el mercado informal de bebidas alcohólicas en México, es fundamental para la existencia de mercados ilegales.

- Las diferencias de precios en México son considerables: los precios en el mercado formal son en promedio 183 por ciento mayores que en el mercado informal y en algunas marcas alcanza mas del 300 por ciento.

- El IEPS¹ y el IVA² combinados incrementan los precios finales al consumidor en 72.5 por ciento, lo cual abre significativamente la brecha entre los precios en el mercado formal e informal e incentiva la existencia de los mercados irregulares de bebidas alcohólicas.
- Una reducción de la tasa actual del IEPS sería un mecanismo eficaz para reducir el incentivo económico y por ende la rentabilidad del mercado ilegal.
- En el caso de México, la elasticidad de sustitución entre el consumo de las bebidas alcohólicas entre el mercado legal y el ilegal es alta. Por tanto, un cambio en la tasa impositiva no modificaría significativamente el consumo total³ de bebidas alcohólicas en México.
- La reducción del mercado informal se debería a: (i) el traslado del consumo de productos ilegales a productos legales; (ii) la desviación del consumo hacia productos de mayor valor agregado; y (iii) el desplazamiento del consumo hacia categorías de productos de mayor precio.
- Cuando se redujo el impuesto de las bebidas alcohólicas en Colombia en 2003, el mercado ilegal disminuyó, en tanto que el consumo *per capita* de destilados no se vio incrementado.

Conclusiones

De todo lo anterior se desprende que:

- La existencia del mercado informal de bebidas con contenido de alcohol es, en algunos países, uno de los principales problemas para reducir el uso nocivo del alcohol:
 - El mercado informal, por definición, está fuera de cualquier control y, en muchas ocasiones, se alimenta precisamente de

¹ Impuesto Especial sobre Productos y Servicios (IEPS) de 50 por ciento ad valorem para las bebidas con un contenido de alcohol superior a 20° G.L.

² Impuesto al Valor Agregado (IVA) de 15 por ciento ad valorem para cualquier tipo de bebida con contenido de alcohol.

³ Entendiéndose como consumo total a los mercados legal e ilegal juntos.

la ventaja desleal que implica el no cumplimiento de la ley y los estándares sanitarios.

- El mercado informal aumenta la disponibilidad de las bebidas con contenido de alcohol sin ninguna restricción de carácter legal y a precios artificialmente bajos que las ponen al alcance de una población mas amplia de consumidores.
- Los operativos contra la producción y venta de bebidas informales son necesarios pero no suficientes para atacar la principal causa del mercado informal; es decir el incentivo que genera el diferencial de precios entre el mercado formal que paga impuestos y cumple con las disposiciones legales aplicables, por una parte, y el mercado informal que no paga impuestos y se encuentra fuera del control de las autoridades sanitarias o de otra índole, por otra parte.
- La sobre regulación incentiva el desarrollo del mercado informal. La experiencia empírica muestra que cuando las prohibiciones o restricciones a la venta y el consumo de bebidas alcohólicas van mas allá de lo adecuado, se crea un mercado informal que ofrece al consumidor una salida a dichas prohibiciones o restricciones vendiendo las bebidas alcohólicas cuando el comercio formal no puede hacerlo.
- La aplicación de altas tasas impositivas puede resultar contraproducente. Si bien es cierto que según la teoría económica, a un mayor precio corresponde un menor consumo, en el caso de las bebidas con contenido de alcohol se puede dar, y de hecho se da en algunos países como México, una sustitución de bebidas formales por informales que mantiene o incluso aumenta el consumo.
- El nivel de impuestos a las bebidas con contenido de alcohol debe tomar debidamente en cuenta el contexto nacional y las diferencias de recursos, capacidades y medios de cada país para evitar que dichos impuestos se vuelvan un incentivo para el desarrollo del mercado informal.
- El supuesto según el cual entre mas alto sea el impuesto habrá un menor consumo, no es universalmente correcto. La realidad muestra que a partir de un determinado nivel, en algunos países, en vez de reducir el consumo se incrementa el mercado informal y por ende el uso nocivo del alcohol.

Finalmente, CIVyL considera que la industria de vinos y licores puede apoyar el combate al mercado informal:

- Realizando campañas en los medios de comunicación exhortando a los consumidores a no comprar bebidas con contenido de alcohol de dudoso origen;
- Informando a la población sobre los riesgos que conlleva el consumo de bebidas con contenido de alcohol de dudoso origen;
- Proporcionando a los consumidores información sobre las características de las bebidas con contenido de alcohol en las que hay que fijarse para no caer en engaños
- Colaborando con las autoridades competentes para localizar los centros de producción y venta de bebidas con contenido de alcohol informales.
- Facilitando a las autoridades competentes el apoyo técnico o el equipo necesario para identificar si un producto dado corresponde a la marca que ostenta o se trata de una bebida falsificada.

Nota

Los tres estudios que se mencionan en esta contribución escrita se pueden solicitar en la siguiente dirección electrónica: ortizjose@civyl.com.mx

Anheuser-Busch's On-Line Submission to the World Health Organization

In 2000, the United Nations (UN) established its Millennium Development Goals to eradicate poverty worldwide. Former UN Secretary General Kofi Annan acknowledged that “the biggest enemy of health in the developing world is poverty.” The World Health Organization (WHO), as the coordinating health authority within the United Nations system, also recognizes the complex intersection of ill-health and poverty in its six-point agenda. Put simply, health and prosperity are linked. The farm-to-table nature of beer means the brewing industry can and does contribute to the economic and physical well-being of millions of people worldwide. Beer – which typically contains much less alcohol than wine or hard liquor – is the beverage of moderation and may be enjoyed responsibly, consistent with WHO’s overall mission of promoting physical, mental and social well-being.

The scientific and medical literature has associated moderate alcohol consumption with a variety of health benefits, while recognizing the negative health consequences of alcohol abuse and the fact that some people (such as youth, pregnant women and those with a family history of alcoholism) should not drink at all. But most governmental authorities – and even WHO – acknowledge that the majority of adults who drink enjoy alcohol beverages responsibly during ordinary social activities. Simply put, it is not the practice of drinking that is bad per se, but rather how drinking is practiced that can result in abuse. Any public health program that demonizes all drinking is destined to fail precisely because ordinary people understand this fact and will ignore messages they perceive as false. Everyone agrees that alcohol abuse and misuse is a serious public health problem. The challenge, therefore, is to craft a global public health campaign that effectively targets problem drinking (not moderate consumption) while taking into account local norms and cultures.

Anheuser-Busch is eager to share its experience with WHO. We have invested – with our wholesalers – more than \$750 million in the past 25 years in a broad spectrum of programs to promote responsibility and discourage alcohol abuse, including drunk driving and underage drinking. As our experience in the U.S with the designated driver concept demonstrates, properly targeted public awareness campaigns can be particularly effective at reducing the public health effects of alcohol abuse and creating positive social mores– especially when they are coupled with strict enforcement of laws.

Examples of the programs¹ Anheuser-Busch supports to help reduce abuse include the following:

Family Talk – Developed by an advisory panel of education, family counseling, child psychology and alcohol treatment professionals, the Family Talk parent guide is available in five languages - English, Spanish, Chinese, Korean and Vietnamese. More than 6.7 million copies have been distributed. DVDs are available in Spanish and English. For more information, visit www.familytalkonline.com.

TIPS (Training for Intervention Procedures) – TIPS provides bartenders, waiters and store clerks with techniques that help prevent alcohol abuse situations. The program was developed by Morris Chafetz, M.D., the founding director of the U.S. National Institute on Alcohol Abuse and Alcoholism, and also discusses intervention techniques that servers can use to prevent drunk driving, such as calling a cab for patrons who may have had too much to drink, or encouraging friends to provide a safe-ride home.

Prevent. Don’t Provide – Research from the U.S. National Academy of Sciences has shown that two-thirds of youth who drink usually obtain alcohol — directly or indirectly — from their parents or other adults. *Prevent. Don’t Provide* is a public awareness program that seeks to stop the illegal supply of alcohol to teens by tapping into the

¹For a full list of programs visit www.beeresponsible.com

Anheuser-Busch's On-Line Submission to the World Health Organization

important role parents and other adults play in the fight against underage drinking. The program reminds parents and other adults not to buy alcohol for minors or provide it to them at parties, no matter what the occasion, and is supported with television, print, radio and outdoor ads that carry the tagline "Be a parent, not a pushover." The National Fatherhood Initiative, The International Association of Fire Chiefs and The Association of Junior Leagues International support this campaign. The importance of involving parents and other adults in this fight has been recognized in the U.S. by the federal government and public health groups alike.

Social Norms – Health promotion professionals have more recently begun using a different approach to fighting abusive drinking, called "social norms marketing." This approach is designed to engender positive behavior by correcting negative misperceptions (usually overestimations by individuals of the alcohol consumption patterns of their peers). This method involves identifying, modeling, and promoting the healthy, protective behaviors that are the actual norm in a given population. Social norms has been helping universities across the United States achieve large-scale positive results in reducing high-risk drinking among their students, some of which have been documented in peer-reviewed studies. Anheuser-Busch first began funding social norms marketing in 1999 and has been providing grant funding during the past six years to nine U.S. universities to help them implement social norms campaigns.² Due to these initiatives, the schools have seen significant increases in protective behaviors such as monitoring the number of drinks consumed, using designated drivers, and staying with friends, as well as significant declines in high-risk drinking behaviors. Anheuser-Busch will be further supporting these efforts, as well as showcasing European social norms efforts, when it hosts a Social Norms Forum on 31 March 2009 in Brussels as part of the company's commitment as a member of the EU Alcohol & Health Forum. The Social Norms Forum will bring together researchers and other stakeholders to discuss the theory and practice behind social norms.

BACCHUS & GAMMA Peer Education Network – Anheuser-Busch is a leading supporter of this initiative, which focuses on peer education and promoting positive peer pressure. BACCHUS, founded in 1975, is the largest student organization in higher education today, and the oldest dedicated to peer prevention of alcohol abuse.

We also believe that our employees, as ambassadors of our company, have a significant role to play in fighting alcohol abuse by being responsible when they choose to drink and modeling responsible behavior with their families, friends and coworkers. The company's alcohol, substance abuse and drunk-driving policies clearly outline expectations and consequences for employees. In addition, the company's safe-ride home program provides employees with a safe-ride home if they feel they cannot safely drive home, regardless of whether they are on business or personal time. For those employees who may need help with an alcohol problem, we offer an extensive array of services through our Employee Assistance Program.

Other proven effective measures that can help prevent alcohol abuse are so-called "brief, targeted interventions." Although many physicians often treat the medical conditions that have resulted from

² These schools include the University of Virginia, Michigan State, Murray State University, Florida State University, Georgetown University, University of Mississippi, University of Hawaii, Virginia Commonwealth, and the University of California-Fresno.

Anheuser-Busch's On-Line Submission to the World Health Organization

alcohol abuse, they often do not talk with patients about their drinking patterns that may have led to the condition. Research suggests that early screenings and brief interventions in crisis situations can be extremely effective in changing behavior. By equipping physicians, first responders, and emergency room personnel with the skills to more effectively identify alcohol-related medical conditions and emergencies – and training them to conduct brief interventions – they can significantly impact the behavior of those who may potentially abuse and misuse alcohol. For 10 years, Anheuser-Busch has funded the Alcohol Medical Scholars program, an organization dedicated to providing this kind of training for physicians.

There is no one-size-fits-all approach that will stop alcohol abuse. Indeed, a single, global approach that fails to take into account cultural differences cannot possibly impact excessive or abusive consumption. But there are actions that can be taken at the global level. Alcohol misuse and abuse can be lessened with support from WHO on:

- (i) Fostering standardized data collection about problem behaviors and disease outcomes (particularly in the developing world, where such data are virtually non-existent);
- (ii) Coordinating resources and training for healthcare providers to better identify and treat problem behaviors and engage in targeted interventions with patients at key crisis points (such as doctor visits, hospitalizations, clinics, health kiosks, schools, etc.); and
- (iii) Increased awareness of the importance of individuals taking responsibility for their own physical and mental health when it comes to alcohol consumption.

What does *not* work in reducing alcohol-related abuse are measures aimed at reducing the entire population's alcohol consumption, like high excise taxes, advertising bans, and restrictive sales rules. There are examples from Sweden to Africa to the United States that show these types of population-based policies have no impact on alcohol abuse and, even worse, foster illicit and/or non commercial alcohol consumption, thereby presenting even greater public health risks and law enforcement problems. Targeting the moderate drinker does not advance public health; the focus must remain on abusive drinking behaviors that actually cause public health problems.

The brewing industry plays an important role in helping keep economies around the world strong by providing job security, fair wages, health benefits and contributing our fair share of corporate, excise, property and sales and use taxes. Beneficiaries of the global brewing industry include the farmers who grow the barley and hops, the employees who make glass bottles and aluminum cans, those who brew and sell beer, and local and national governments.

Over-regulation, no matter how well-intentioned, would hinder our businesses without actually helping prevent alcohol abuse. Over-regulation can cause lay-offs and thus, unintentionally contribute to the cycle of poverty and ill-health. Striking the right balance between public health and trade is essential. Anheuser-Busch is committed to continuing its work with many organizations – including with WHO as it seeks 'enhanced partnerships' with the private sector – toward our mutual goals of reducing alcohol abuse.

THE WORLDWIDE BREWING ALLIANCE FULL CONTRIBUTION TO THE WHO IN-LINE CONSULTATION

The Worldwide Brewing Alliance (WBA) is an unprecedented forum which brings together trade bodies representing brewers of all sizes from around the world. The Alliance currently represents 88% of global beer production, and is still expanding.

Its members are listed below.

The Brewers Association of Australia and New Zealand Inc.,
The Beer Institute (USA),
The Brewers Association of Canada,
The Brewers of Europe (whose membership encompasses 26 European brewing trade associations),
The British Beer & Pub Association,
The China Brewing Industry Association,
Cerveceros Latinoamericanos (whose membership includes South American Brewers and trade Associations),
The Japanese Brewers Association,
Korea Alcohol & Liquor Industry Association and
The Union of Russian Brewers.

The Worldwide Brewing Alliance focuses on demonstrating the efforts by the brewing sector to help ensure its products are consumed responsibly and facilitate exchange of good practice and information in social responsibility and product integrity issues.

What are your views on effective strategies to reduce alcohol-related harm?

Some specific examples of interventions that, when tailored to meet local needs, have been successful are:-

- Enforcement of existing minimum purchasing age and drink driving laws coupled with raising public awareness;
- Education, including parental guidance;
- Screening and brief interventions (such as for heavy drinkers and those at greater risk, particularly underage people);
- Social norming (Social interventions to reduce perceptions that heavy drinking is accepted and normal);
- Effective self-regulation of alcohol advertising and marketing to ensure that underage youth are not targeted with marketing messages
- Responsible retailing including server training;
- Targeted drink driving reduction schemes such as alcohol interlocks for recidivists.

For such interventions to be effective it is essential that they

- Take into account all the evidence;
- Differentiate between moderate and irresponsible alcohol consumption;
- Understand and target the problems;
- Identify and classify the drivers of different drinking behaviours, both positive and negative;
- Focus on encouraging responsible behaviour;
- Target the individuals who consume alcohol beverages irresponsibly instead of compromising the possible health benefits enjoyed by the millions of consumers who drink responsibly;
- Place consumer education at the heart of the equation;
- Be designed and conducted over many years (aiming for improvement long term);

- Involve all relevant stakeholders through partnerships including other parts of the alcohol drinks industry, national, regional and local governments/authorities; professional and academic institutions etc.;
- Consider fully the diversity of societies, cultures and traditions;
- Take account of the specificities of beer and other categories of alcohol drinks.

In our experience, measures which aim to reduce overall consumption:

- Have little effect on individuals who consume alcohol beverages irresponsibly;
- Compromise the potential health benefits of the millions who drink responsibly.

At the Roundtable meeting with economic operators held on 6th November, it was suggested that producers of alcohol drinks should consider what direct action they would take to reduce the harmful consumption of alcohol. In this context, product strength and container size and form was referred to.

With regard to the strength of beer, the WBA is not aware of any global move towards increased alcohol content. Over the past ten years, in 45 countries for which estimates are available, 26 have remained at the same average strength, 11 have decreased and 8 have increased. In those countries where there has been a move towards premium products, this has not increased the average strength of beer to a significant extent. This is an area that the WBA could investigate further in order to provide more detailed data.

Brewers produce beers with a range of strengths to satisfy consumer demands: from alcohol free, through low alcohol, mid strength, standard and premium strength products.

With regard to container sizes, these are either constrained by legislation, logistics or market demands. The engineering of packaging lines, transport and retail considerations all dictate the form and size of the consumer unit and secondary packaging. During new product development, careful consideration is given to the form of the package, and labelling in order to ensure that it is socially responsible and does not have a particular appeal to underage consumers.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

From a global perspective, we believe the most appropriate ways to reduce problems related to harmful consumption of alcohol drinks need to reflect a number of aspects including:-

- The diversity of Member States, and not imply a one-size-fits all policy prescription;
- The need for Member States to consider tailoring their national approaches based on what is feasible, effective and relevant to their particular economic, social and cultural contexts;
- The need to search for effective interventions that do not unduly restrict the responsible consumption by most consumers, nor their rights and freedoms, and that are based on all the evidence;
- The need for a transparent and balanced approach, engaging all legitimate stakeholders, including the brewing sector, to explore and identify effective approaches to alcohol policy.

We believe that governments can achieve a balance between appropriate regulation of alcohol beverages and an approach that seeks to reduce all forms of alcohol consumption. We support government regulation that puts in place and enforces alcohol licensing and regulation schemes, and minimum age purchase and drunk driving laws. We also support strong, voluntary self-regulation of alcohol marketing practices. Self-regulation of alcohol marketing has been recognized as effective in reducing the likelihood that alcohol beverage

marketing will, by its content or placement, target underage youth. Self-regulation achieves the goals of appropriate content, in numerous areas, and placement while conserving government resources. Strong self-regulation of advertising and other regulated business practices is also more prompt with enforcement than government regulation can be.

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

The WBA is a unique forum. Its prime objective is to act as a conduit for exchanging examples of best practice concerning Corporate Social Responsibility initiatives. These encompass: alcohol and society; food safety and environmental issues.

The brewing sector worldwide is opposed to misuse of its products. It is a fully committed partner in searching for appropriate, targeted and balanced solutions. Its members and the companies and associations who are their members have the issue of tackling alcohol misuse on the top of their agenda. They welcome the opportunity to exchange best practice to ensure the effectiveness of the campaigns they organise.

Brewers all over the world play a leading role in, and commit significant resources to, a growing number of social responsibility initiatives, either individually as brewers, through their subscriptions to trade associations or by subscribing to Social Aspects organisations. “Global Social Responsibility Initiatives” published by the WBA in 2003 listed more than 360 initiatives from 34 countries. The second edition published in 2007 included more than 570 initiatives from 46 countries. Impressive as this document is, it cannot be considered in isolation. The worldwide brewing sector has a long-standing reputation for being socially responsible. This pre-dates the current trends in Corporate Social Responsibility (CSR), as evidenced by the number of campaigns and Codes which have been running for 40-50 years. These initiatives cover a variety of aspects including:

- Encouraging Responsible Consumption;
- Preventing Underage Drinking;
- Deterring Drinking and Driving;
- Responsible Commercial Communications;
- Responsible Retailing;
- The workplace; and
- Research.

A major example is the brewing sector’s commitment to encourage independent research into the medical and social aspects of alcohol consumption. For the past 35 years the brewing sector has hosted the International Medical Advisory Group conferences for the international scientific community to exchange views on the latest research. The WBA supports this work.

The worldwide brewing sector’s long-standing experience in supporting, encouraging and developing, at local and national level, concrete initiatives and projects which target misuse, has been most successful where this has been done through partnerships with government and other stakeholders. Examples of partners include:

- National governments;
- Local and regional authorities;
- Road safety authorities;
- Driving schools;
- Police Authorities;
- Other civil society individuals (lawyers, teachers, attorneys, professors, academics etc.);
- Young adults (18-30);

- Health and medical associations;
- Consumer Groups;
- Self-regulatory organizations;
- Other NGOs;
- Other alcohol drinks producers;
- Horeca, Retailers and Distributors;
- Media Broadcasters;
- Advertising Agencies; and
- Other industries.

The WBA is committed to build on the above partnerships, disseminate good practice and stimulate and inspire its members to commit to effective long term initiatives.

In addition, since 1998, the WBA has regularly produced a report on Drinking and Driving. The information comes from questionnaires completed by brewing trade associations from all over the world. It includes details of the laws relating to drinking and driving and the brewing industry's initiatives to deter people from drinking and driving. The 2003 report was circulated on the occasion of World Health Day 2004 which was devoted to road safety. The 2008 report includes details from 53 countries (12 more than the 2005 report) a large number of which report declining alcohol related fatalities despite widely differing legal systems and cultures. These reports demonstrate the importance the brewing sector places on this area and serve to inspire additional involvement. They also show the number of different ways needed to tackle problems which appear similar due to the cultural diversity and clearly shows why a one size fits all approach would be ineffective.

The Worldwide Brewing Alliance itself can contribute to the reduction of alcohol-related harm in a number of unique ways. Concrete examples of the leading role we play in this matter include the following:-

- Collating and circulating information about brewers initiatives worldwide;
- Organising regular sessions to exchange and share best practice to stimulate and inspire new initiatives;
- Encouraging and assisting brewing organisations to initiate new partnerships and initiatives and commit to effective long term interventions; and

Encouraging responsible behaviour

Posición de Industrias La Constancia, El Salvador

Industrias La Constancia agradece la oportunidad otorgada por la Organización Mundial de la Salud de apoyar el proceso consultivo para desarrollar una estrategia global que reduzca los usos dañinos en el consumo del alcohol. Como empresa estamos convencidos que para reducir los problemas relacionados con el abuso en el consumo del alcohol es necesario llevar a cabo procesos consultivos como este, en los que todos los organismos relacionados con el tema del alcohol tengan la oportunidad de desarrollar una estrategia global que aborde este problema desde sus diversas y complejas perspectivas.

En Industrias La Constancia estamos convencidos que el uso responsable del alcohol es una actividad social y culturalmente aceptada y que forma parte de las costumbres de la mayoría de las personas adultas. Desafortunadamente existen personas que utilizan mal el alcohol y que ponen en riesgo su salud y seguridad y la de otros.

Por esta razón, es necesario participar en procesos de consulta en los que se aborde esta problemática y se puedan reflejar todos los contextos nacionales, culturales y sociales, así como las iniciativas desarrolladas por diversas organizaciones en diferentes países.

Como empresa creemos que un factor determinante para la efectividad de las estrategias de alcohol es que todos los actores que se relacionan con el alcohol (productores, vendedores, padres de familia, consumidores y autoridades) deben formar parte activa dentro de las estrategias propuestas.

Los gobiernos, las organizaciones, la comunidad científica y la industria deben actuar en coordinación para definir estrategias e invertir recursos. Posiciones antagónicas dan por resultado esfuerzos dispersos, poco eficaces y proclives a la extinción. Diagnósticos correctos, estrategias focalizadas y recursos suficientes son sólo posibles si todas las partes interesadas trabajan juntas.

Adicionalmente es muy importante contar con información transparente y objetiva sobre los problemas relacionados con el alcohol, esta información debe ser comprobada y contrarrestada contra las circunstancias específicas de cada país, para que la estrategia responda a la realidad del país, tomando en cuenta factores culturales y la disponibilidad de recursos que pueden ser utilizados por cada país.

Las estrategias deben ser coordinadas de zonas geográficas específicas que tomen en cuenta los problemas con una perspectiva regional. Diferentes regiones enfrentan problemas diferentes. El nivel de información de la población, los patrones de consumo y el marco legal son elementos que difieren de acuerdo a la zona geográfica. Programas que tomen en cuenta estos factores tienen mayor probabilidad de resultar exitosos.

Las formas efectivas de reducir los riesgos asociados al consumo irresponsable del alcohol incluyen programas de prevención y de disuasión. Estos programas van dirigidos a personas vulnerables por su condición y

edad. La efectividad de los programas sólo puede asegurarse si se basan en estudios científicos que den evidencia objetiva de los cambios logrados.

Además las estrategias para reducir los riesgos asociados al consumo irresponsable del alcohol solo podrán ser efectivas si se toma en cuenta posibles consecuencias sociales negativas como por ejemplo que a través de una estrategia prohibitiva en extremo para el sector formal, regulando excesivamente el alcohol lo que se logre sea desarrollar el mercado ilícito que no se regirá por las mismas reglas. Por esta razón es importante distinguir entre el mercado formal e informal.

Tomando lo anterior en consideración, Industrias La Constancia, de El Salvador, ha venido desarrollando diversas iniciativas para fomentar el consumo y la comercialización responsable de las bebidas con contenido alcohólico. Este trabajo ha sido integral, el objetivo de desalentar el consumo y la comercialización irresponsable de bebidas con contenido alcohólico y el no consumo de menores forman parte de la Política de Desarrollo Sostenible de nuestra empresa. Por esta razón promovemos el uso responsable de nuestros productos y combatimos el mal uso de los mismos.

Dentro de la Política de Desarrollo Sostenible se han planteado como objetivos concretos el promover la responsabilidad en el consumo de bebidas alcohólicas como parte de un estilo de vida saludable, al mismo tiempo que se trabaja para evitar el abuso y mal uso del alcohol, Adicional a la legislación nacional y los códigos autorregulatorios de la industria, hemos establecido el Código de Comunicación Comercial para que en nuestras comunicaciones comerciales, la promoción de nuestras propias marcas sea solo entre personas mayores de edad, que hayan tomado la decisión de consumir bebidas alcohólicas. También nos aseguramos, mediante nuestro código de autorregulación y por medio de comité internos de autorregulación que el compromiso de responsabilidad se mantenga transparente en todas las áreas de la compañía.

Adicionalmente a estos esfuerzos, nuestra organización contribuye de forma activa con diversos programas que ayudan a proveer información precisa, objetiva y balanceada sobre el consumo de alcohol a nuestros clientes y consumidores. Esta tarea la realizamos por medio de nuestros programas de Consumo Responsable, Comercialización Responsable y No Consumo de Menores.

Nuestra empresa contribuye a la reducción de las consecuencias del uso irresponsable del alcohol de todas las formas que han probado ser de valor. Creemos que este es un importante aporte ya que nuestro interés es que nuestros productos sean utilizados de manera responsable. Somos parte de la comunidad y el bienestar de ésta es nuestro bienestar.

Intentamos ser un modelo predicando con el ejemplo. Por esta razón nuestro código de autorregulación exige que los empleados, de todos los niveles, de Industrias La Constancia deben tener una conducta responsable cuando se consumen bebidas con contenido alcohólico; esta forma de actuar debe coincidir dentro y fuera de la empresa.

También damos información precisa y útil sobre los efectos del alcohol en el

organismo y desarrollamos campañas de educación sobre el uso del alcohol enfocadas a prevenir el consumo excesivo, evitar el consumo de menores de edad, mujeres embarazadas y en los conductores.

Nuestras iniciativas más relevantes son las siguientes.

Seminario Alcohol y Sociedad

Este seminario es un evento anual de carácter científico en el que se presentan temas relacionados con las bebidas alcohólicas a cargo de ponentes internacionales de reconocida trayectoria científica.

ILC es conciente de su responsabilidad social empresarial al auspiciar eventos científicos sobre la temática del Alcohol. La audiencia asistente es de funcionarios del Viceministerio de Transporte, Policía Nacional Civil, Alcaldías, Propietarios de Negocios, Profesores y Periodistas.

Educación al comercio.

Para brindar información a nuestros clientes desarrollamos nuestro “Seminario para meseros y Bartenders”

Este seminario se realiza de forma anual y es dirigido a meseros y bartenders del área del gran San Salvador. En total se han capacitado a más de 900 meseros, bartenders y dueños de negocios de 150 establecimientos.

Los asistentes reciben técnicas para identificar consumos irresponsables de bebidas con contenido alcohólico, técnicas para tratar con clientes que han abusado en el consumo. Así mismo se les hace conciencia de la necesidad de pedir identificación a las personas para verificar que se trata de mayores de edad.

Foro para la juventud

Esta actividad es dirigida a jóvenes de 16 a 25 años de edad. En total se ha contado con la participación de 654 jóvenes. En el Foro se tratan los temas de “Consumo Responsable”; “Efectos del Alcohol” y “Consecuencias de las decisiones”

El seminario es vivencial, se utiliza una técnica innovadora de obra de teatro para captar la atención de los asistentes, así como la participación de una Doctora en psiquiatría que ofrece el tema de efectos del alcohol. El énfasis es el No consumo de menores y el uso responsable del alcohol para divertirse sanamente cuando se es mayor de 18 años.

Conversando sobre el alcohol

El programa fomenta el no consumo de menores y las prácticas responsables en el consumo de alcohol cuando se es mayor de 18 años. El programa está dirigido a jóvenes del área metropolitana de la capital de El Salvador que cursan de octavo a noveno grados (13-15 años). En este programa también se involucran a los maestros y padres de familia. En total han sido 13,670

alumnos capacitados con el programa Conversando sobre el Alcohol y el programa continua todos los años con una meta anual de capacitación de 2,500 alumnos.

Prevención de Accidentes de Tránsito

Adicionalmente creemos que es de suma importancia interactuar con las autoridades locales para que ellos encuentren en nuestra industria un aliado confiable que aporte a la disminución del consumo dañino de las bebidas con contenido alcohólico. Es por esta razón que trabajamos de la mano con el Vice-Ministerio de Transporte de nuestro país para crear estrategias que ayuden a reducir los casos de conducir bajo los efectos del alcohol y del abuso en el consumo de alcohol.

A través de estas alianzas hemos logrado desarrollar la campaña de prevención de accidentes de tránsito en los períodos de vacaciones nacionales: semana santa, agosto y diciembre. Esta actividad se realiza en coordinación con el Viceministerio de Transporte y Canal 12 de televisión.

Los anuncios tienen como finalidad fomentar el consumo responsable y la asignación de un conductor designado elegido por el grupo para que no ingiera bebidas con contenido alcohólico y lleve a los demás a sus casas.

Industrias La Constancia a donado equipos para que la Unidad Antidoping del Viceministerio de Transporte pueda lograr mayor cobertura en el interior del país, teniendo en el lapso de cinco años que la causa de accidentes de tránsito ha pasado por motivos de alcohol de ser la tercera a ser la séptima causa dentro de un rango de las principales 10 causas de accidentes de tránsito según estadísticas del Viceministerio de Transporte.

No consumo por menores de edad.

Sumado a estos esfuerzos también estamos trabajando de la mano con los establecimientos de venta de nuestros productos para la correcta rotulación de los lugares. Para este fin hemos desarrollado piezas gráficas llamativas con la leyenda “Aquí solo los mayores de 18 años toman cerveza” para desalentar los esfuerzos de los jóvenes por obtener bebidas con contenido alcohólico.

Quisiéramos finalizar reforzando que nuestra empresa está convencida que los avances en la reducción del consumo dañino de las bebidas con contenido alcohólico solo será posible si todos los actores relacionados con el alcohol trabajan de forma conjunta desarrollando estrategias efectivas en sus costos e impacto de acuerdo a programas efectivos y rigurosos de prevención y educación. Las legislaciones, en lugar de ser restrictivas y prohibitivas, deben dar lugar a que las personas sean capaces de obtener información sobre las consecuencias del uso dañino del alcohol para que tengan conocimiento de los riesgos y consecuencias de este tipo de conducta. Estamos concientes de que al contar con mayor información los consumidores tomarán mejores decisiones lo que ayudará a disminuir los riesgos relacionados con esta problemática.



ON-LINE SUBMISSION TO WORLD HEALTH ORGANIZATION ON WAYS OF REDUCING HARMFUL USE OF ALCOHOL

For many adults around the world enjoyment of alcohol is a pleasurable part of a healthy and balanced lifestyle, contributing to relaxation, social interaction, celebration of special occasions, or enhancement of food. However, whilst the majority of persons generally enjoy their alcohol consumption in an appropriate and responsible manner we recognize that abuse or misuse can have negative consequences.

We view WHA Resolution 61.4 on Strategies to Reduce the Harmful Use of Alcohol as an opportunity. Led by the WHO Secretariat, and endorsed and approved by Member States, we can build a constructive and inclusive global strategy by engaging all stakeholders to reduce the harmful use of alcohol.

Many aspects of harm reduction demand a change in consumer attitudes and behaviours. There is no “silver-bullet”, and effective solutions require strategies that are targeted, evidence-based, multi-disciplinary, and are sympathetic to local cultural conditions and environment.

Effective policies need to take into account and reflect relevant market realities:

- Over half of global alcohol consumption may be from informal, unrecorded or illicit sources – further, it has been stated that “Western style” branded alcoholic beverages account for less than 10% of global consumption.
- In some developing countries many of the retail structures may also be “informal” or illegal – figures of up to 60% of outlets have been cited as an example.
- Reasonable regulation can, and should, be part of a balanced policy.
- There should be effective and visible enforcement of regulatory measures such as drink-driving laws or sales to those under legal purchase age.
- Excessive regulation can both punish the responsible majority and have unintended consequences such as driving harmful users to the informal or illicit market, or creating a market for smuggled goods.
- Well designed and implemented targeted interventions against harmful use (e.g. drink-driving, serving intoxicated customers etc.) can be effective. However, very often a culture change in the acceptance of personal responsibility and rejection of misuse is needed to effect real change – this demands both a long-term approach and a multi-stakeholder input.

- Commercial, legitimate beverage alcohol supplies a significant benefit to many economies via employment, taxation revenue, and tourism, as well as its contribution to enjoyment of food and social occasions.

Our Beliefs

As a company transformed in 2006 from essentially a domestic US-based producer to an internationally focused organization with production emanating from eight countries, Beam Global Spirits & Wine has broadened a formal framework for the responsible sale & marketing of its products.

The misuse of alcohol is incompatible with our fundamental business objectives and our values as a member of society. Our core principles in combating or avoiding misuse or abuse are:

- We respect the rights of legal age adults to choose to drink alcohol, or not to drink at all.
- Those who choose to drink must accept responsibility to do so in moderation and responsibly.
- Alcohol purchase below the legal purchase age is illegal and cannot be condoned or tolerated.
- Moderate consumption can be compatible with a healthy lifestyle for many adults, but excessive or abusive consumption can impact health and wellness.
- We believe that all alcohol in a society should be sold within a framework regulated by government.
 - Each society, based upon its respective cultural traditions, should have laws establishing an age at which citizens are deemed mature enough to drink alcohol, affirming that purchase under this age is illegal.
 - Each society should establish and enforce appropriate laws regarding driving after alcohol consumption.
- Alcohol producers should market their products responsibly to legal purchase age adults (as defined in each society) and preferably within a publicly stated code of practice.
- Producers should be stakeholders in the formulation of responsible public policy regarding alcohol, and should be part of the solution to address the problems of misuse.
- Partnership among local, national and international stakeholders is necessary to achieve meaningful reduction of misuse.

Our Marketing Code

In 2007 we adopted the Beam Global Spirits & Wine Marketing Code. In summary the Code mandates:

- Advertising & marketing in content and media placement is directed to legal purchase age adults.

- Brands are presented in a responsible manner & do not encourage excessive or immoderate consumption.
- Abstinence or moderation is not presented in a negative way.
- Consumption is not depicted in association with anti-social, unruly or illegal behaviour.
- No implication that consumption enhances mental or physical performance.
- No link to behaviour or activities that would be dangerous while consuming alcohol.
- No suggestion that consumption enhances sexual, social or professional success.

Compliance with all provisions of the Code is mandatory for all company personnel worldwide. It is to complement any existing national codes and laws, both mandatory and self-regulatory. We are currently in the process of updating and strengthening the Code for publication in 2009, with particular focus on training.

Consumer Information

In 2008 we launched our own global drinksmart® initiative (www.drinksmart.com), and are currently engaged in rolling this out across international markets as part of our initiative to provide consumers information on alcohol consumption. The multilingual website features access to a number of national consumer information websites designed to help the consumer understand responsible drinking.

At the heart of drinksmart® are six principles:

- Act: take responsibility for your actions
- Care: drink in moderation
- Cherish: drive safe
- Control: be a responsible host
- Respect: informed adults have the right to choose whether to drink, or not
- Embrace: know the law & obey it – under-age purchase & consumption should not be condoned.

Partnerships

In our corporate home market we've successfully partnered on initiatives to prevent under-age consumption and promote safer driving.

"B Wise"

In partnership with the International Institute of Alcohol Awareness we've harnessed the concerted efforts of faculties, administrators, parents, the police, and students themselves to identify the most effective ways of preventing underage and binge-drinking. From this we've developed practical tool kits to tackle the problems and then work with college campuses to put the ideas into action.

Driving While Intoxicated (DWI) Courts

Our collaboration with the US National Association of Drug Court Professionals has resulted in the first dedicated centre for DWI courts. These courts deal

specifically with hardened and repeat “drunk-drivers”, both in terms of sentencing and rehabilitation. Judges, prosecutors and healthcare professionals work together not just to address the crime but to provide treatment for people with a problem with alcohol abuse. Emphasis is on long-term ongoing accountability, and evidence indicates these DWI focused courts are extremely effective in preventing re-offending.

As part of our drinksmart® activities around the world we are engaged with and fund various trade and social aspects organizations that mirror our responsibility principles. These organizations all actively make a real contribution to tackling the problems of alcohol harm and misuse. Covering a wide geographic spread, they include:

- *The Century Council* (www.centurycouncil.org);
- *Drinkaware* (www.drinkaware.co.uk);
- *The Scotch Whisky Association* (www.scotch-whisky.org);
- *The European Forum for Responsible Drinking* (www.efrd.org);
- *Fundacion Alcohol y Sociedad* (www.alcoholysociedad);
- *Drinkwise* (www.drinkwise.org.au).

Employee Awareness and Education

As well as being employees and ambassadors for our company, many of our workforce are also consumers. As part of our role as responsible employers we have recently issued an information booklet entitled “Talking About Alcohol” to all our worldwide employees; this booklet explains some of the basic facts about alcohol consumption and responsible drinking.

Summary

We believe that as that as producers of beverage alcohol products we can contribute to responsible consumption of our products. We are committed to:

- Ensuring responsible marketing via effective enforcement of our Marketing Code.
- Delivering consumer information via responsible drinking messages and information.
- Ensuring our employees and industry trade and social aspects partners have the information and resources to promote responsible drinking.
- Partnering with other stakeholders to deliver targeted harm-reduction initiatives.



VIN & SOCIÉTÉ

Contribution à la consultation de l'OMS sur les moyens de réduire l'usage nocif de l'alcool

Vin & Société est une association qui fédère et représente tous les acteurs de la filière vitivinicole française (production, négoce et interprofessions). Elle a notamment pour mission de promouvoir une consommation qualitative, conforme aux repères de modération et aux normes de santé publique. Dans ce cadre, Vin & Société initie et accompagne un ensemble d'actions pour promouvoir un modèle de consommation responsable ; elle soutient par ailleurs des actions citoyennes, notamment celles menées par les pouvoirs publics, pour lutter contre les conduites à risque.

Notre travail s'intègre au Plan européen Vin (voir contribution du CEEV) et s'inspire de ce qui est fait au Québec par Educ'Alcool.

Nous estimons que le vin occupe une place particulière dans le monde des boissons alcoolisées et correspond aujourd'hui à un mode de consommation qualitatif et modéré. Le vin fait partie de la culture européenne et son rôle a évolué au fil du temps. D'abord partie intégrante d'une alimentation équilibrée, il est devenu aujourd'hui un élément de convivialité, consommé avec modération et compatible avec un mode de vie sain. Il est souvent associé à la gastronomie, l'histoire, les produits de terroir, le respect et l'apprentissage de la qualité gustative et reflète la diversité des habitudes culinaires européennes.

Q1 : points de vue sur les stratégies efficaces pour réduire l'usage nocif de l'alcool

La politique de santé menée en France depuis près de 20 ans pour réduire l'usage nocif de l'alcool s'est essentiellement concentrée sur des mesures d'interdit et le discrédit des boissons alcoolisées. Le résultat est une baisse globale de la consommation d'alcool, principalement assumée par le vin, mais pas d'effet significatif sur les consommations à risque. On peut même constater une augmentation des phénomènes d'ivresse chez les jeunes.

L'éducation et la prévention ont été omises, ce qui est regrettable. Pour être efficace, une politique de santé publique doit comprendre un volet éducatif et pédagogique ambitieux, en particulier auprès des jeunes générations. Elle doit également être adaptée aux cibles visées : on s'adresse différemment à une femme enceinte, un homme à la retraite ou un adolescent en rébellion.

Pour réduire efficacement l'usage de l'alcool, il nous semble important de prendre en compte les éléments suivants :

- L'éradication de toute consommation d'alcool n'est pas envisageable, les seules mesures d'interdit et de discrédit de l'alcool ont prouvé leur inefficacité sur l'usage nocif de l'alcool (voir période de la prohibition aux Etats-Unis), elles doivent être accompagnées de programmes d'éducation à la modération et au bien boire ;
- les conséquences de la consommation d'alcool dépendent du mode de consommation, si une consommation abusive est nocive, une consommation modérée peut avoir certains bienfaits sur la santé ;
- ces modes de consommation et leurs impacts doivent être remis dans leur contexte pour que l'on puisse trouver des solutions adaptées efficaces ;
- des études ont prouvé que les modes de consommation des différentes boissons alcoolisées sont fortement influencés par des facteurs culturels qui varient en fonction des régions, des pays.

Q2 : points de vue sur les meilleurs moyens de réduire les problèmes liés à l'usage nocif de l'alcool dans une perspective mondiale

Une approche mondiale pour réduire la consommation nocive d'alcool sera d'autant plus efficace qu'elle prendra en compte les points suivants :

- ce n'est pas la consommation d'alcool en elle-même qui pose problème mais la consommation abusive ;
- les mesures proposées doivent s'adapter aux différents contextes nationaux, culturels, religieux impactant sur le mode de consommation ;
- il existe différentes parties prenantes et notamment les opérateurs économiques dont le rôle prescripteur auprès des consommateurs doit être exploité ;
- l'approche constructive adoptée au niveau européen devrait porter ses fruits dans les années à venir et peut servir d'exemple pour une approche pluriculturelle.

Q3 : moyens par lesquels votre contribution est susceptible de réduire l'usage nocif de l'alcool

En tant que producteurs, nous estimons pouvoir apporter une contribution intéressante à la prévention des consommations à risque et à l'éducation à un mode de consommation responsable, en représentant un interlocuteur différent des pouvoirs publics auprès des consommateurs.

Notre action s'intègre aux engagements pris auprès des autorités européennes par les la filière vin et contenus dans le Plan européen *Vin Wine in moderation*. Vin & Société s'inspire également beaucoup de ce qui est fait par Educ'Alcool au Québec. Leur ton nous semble juste et adapté aux publics visés.

En 2008, nous avons plus particulièrement insisté sur deux actions :

- la diffusion d'éthylotests pour inciter les conducteurs à se tester avant de prendre le volant, dans le cadre d'un partenariat avec la Sécurité routière française. L'objectif est d'amener les conducteurs à s'auto-évaluer et à mieux connaître leur capacité de consommation pour respecter la limite légale de 0,5 g/l au volant. De décembre 2007 à

septembre 2008, près de 60.000 éthylotests ont été distribués par la filière, principalement dans le cadre de fêtes viticoles et d'événements de dégustation de vin.

- l'élaboration d'un site internet pour promouvoir la modération dans la consommation de vin : <http://vinetsociete.fr>. Ce site valorise les repères de modération et offre des conseils aux consommateurs pour adopter une consommation responsable en toute circonstance. Il a été soumis à l'avis de spécialistes médicaux.

En 2009, nous envisageons de mener les actions suivantes :

- un programme pédagogique pour sensibiliser les 12-15 ans aux risques liés à la consommation d'alcool à travers la transmission aux enseignants et infirmières scolaires de brochures spécifiques, adaptées à chaque discipline et aux programmes scolaires. Un site internet et un film de témoignages seront également proposés.
- des outils de promotion de la consommation responsable (brochures, posters et autres visuels) seront mis à disposition des professionnels de la filière et des partenaires de la filière pour faire la promotion des repères de modération, des techniques de dégustation, du respect du taux légal d'alcoolémie au volant et informer sur les limites de consommation différentes suivant le sexe et le poids notamment.

Ces actions nous permettent à la fois de sensibiliser les consommateurs de vin à la consommation responsable mais aussi d'éduquer l'ensemble des professionnels de notre filière à un message de modération responsable auprès de leurs clientèles. Cette double mission pédagogique nous semble indispensable à mener pour le bien de tous et doit recevoir le soutien des autorités publiques.

Submission to the WHO Stakeholder Consultation
Resolution WHA61.4

Introduction

The Heineken Group aims to be a leading (number one or two) brewer in each of the markets where we operate and to have the world's most valuable brand portfolio. Our principal international brands are Heineken® and Amstel®. In addition, we own more than 170 international, regional, local and specialty beers around the globe, with a total Group beer volume of 139.2 million hectolitres in 2007. We have the widest international presence of all brewers, thanks to our global network of distributors and 119 breweries in more than 65 countries. We also have cider, low-alcohol beer, non-alcohol beer, water and soft drinks in our portfolio.

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

Effective strategies recognise the issue

Drinking beer can be, and in most cases is, a positive part of a balanced, healthy lifestyle. Millions of people around the world responsibly consume and enjoy good quality beers. Beer brewing and the enjoyment and appreciation of beer, is a centuries-old tradition, which forms an important part of the cultural heritage of many nations. However, when consumed by the wrong people, at the wrong moment, for the wrong reasons or in too large a quantity, there is the potential for a negative impact on both societies and individuals. These impacts can range from health issues to personal injury, from noise and disturbance to violent conduct.

As a responsible brewer, we want to be, and believe we need to be, a part of the debate about, and a part of the solution to, these types of issues. As both a company and an industry, we are increasing our actions and our resources in order to do that.

Effective strategies educate and inform

We understand the responsibility we have as a brewer towards society. At the same time, it is our belief that the informed individual is responsible for his or her own choices and drinking behaviour. This determines that one of our key aims, strategies and areas for activity is to help build the knowledge and understanding that helps consumers make positive choices. Education in its broadest sense plays an important role in helping to prevent abuse of alcohol, in particular by those underage. Research clearly shows that those under the legal age of consumption for alcohol are mostly influenced by their parentsⁱ, familyⁱⁱ and peersⁱⁱⁱ.

Effective strategies are balanced

We believe strongly in self-regulation of commercial communication balanced with reasonable regulation on production, distribution, marketing and sales. It is our belief that excessive regulation or taxation runs the risk of generating unintended and often negative consequences. For example previous experience shows for example that tax increases on beer simply leads to increases in informal channels of alcohol purchase, with its associated health risks, or purchases of other less expensive forms of alcohol^{iv}. Prohibition failed in the United States^v.

Effective strategies are targeted

In order to be truly effective, a balanced alcohol policy should focus on addressing the causes of irresponsible consumption and the minority of individuals or groups who consume irresponsibly. Alcohol policy should not intentionally or unintentionally have a negative impact on the majority of those who consume responsibly and enjoy the benefits.

Effective strategies are integrated

It is clear that there are no quick or easy wins to the ultimate solution of alcohol abuse and misuse. It is a complex issue with multiple causes and in which Governments, health organisations, schools, communities, parents and the various parties in the distribution chain (brewers, distributors, and retailers) need to play their role.

To be effective, any strategy needs to be integrated and have a clear commitment to concrete, visible action from all stakeholders.

Effective strategies are being enforced across the spectrum of the issue

Regulation also pre-supposes a framework of enforcement. In developing markets, this framework is less stable as compared with developed markets. The role of non- commercial alcohol is in many developing markets very substantial. In some countries more than half of the alcohol beverage consumed is informal or illicit, presenting significant personal health and general social risks. Ensuring that both the informal sector and the formal sector are covered by and adhere to legislation and other aspects of alcohol policy is an important element of an effective strategy in developing markets.

It is also clear that the countries across the world vary considerably in their level of enforcement of the multitude of existing laws which currently regulate the industry.

Heineken fundamentally and publicly supports the enforcement of all relevant laws relating to alcohol and beer and believes that this is pre-requisite in helping to reduce alcohol related harm and alcohol abuse.

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

One size cannot fit all

Having operations all around the world, we know that the most effective policies take into account the local cultural context and the local socio-economic development of the market. The objectives of our policies are global but the way we reach those objectives are, and must be, locally driven. The same applies to alcohol policies: a “one size fits all” strategy will not be effective given the massive diversity in cultures, economies, attitudes and issues

An “all-evidence” approach is key

Taking into account all evidence from all sources is a key aspect of devising workable, effective and holistic solutions. Making a distinction between responsible consumption and abuse, alongside the acquisition of a good knowledge of what the drivers and causes of abuse are in any given market, are also critical steps in developing sustainable effective alcohol policies. A profound analysis of drinking patterns, and drinking demographics across both the formal and the informal sectors is a critical step in addressing alcohol related harm.

National and supra-national co-operation supports an integrated approach

In all markets, our view regarding an integrated approach holds true given that there are often many factors contributing to alcohol abuse, therefore engagement of all legitimate stakeholders – including the brewing, retail and horeca sector – in prevention is a pre-requisite.

That is why in most of its key markets, Heineken is engaged both as a company and as part of the beer industry in discussions, actions and partnerships to address the issues relevant to those markets. A prime example at a supra-national level is European Union Forum on Alcohol and Health which Heineken supports both as founding company member and through its membership of the Brewers of Europe. The Forum is the main instrument of the European Union to agree and implement a strategy to reduce alcohol-related harm. In this regard, members of the Forum are challenged to post concrete commitments. Heineken’s commitments fall into three areas: our responsible consumption programme, our Rules on Responsible Commercial Communication and our internal Cool@Work programme. The commitments have been published on the website of DG Consumer Protection & Health

(http://www.ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/alcohol_forum_en.htm).

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

In line with our vision on effective reduction of alcohol abuse, the implementation of our alcohol policy has the following key pillars:

1. Pro-active support for Self-regulation in relation to responsible commercial communication . The promotion of responsible consumption is an important element in our alcohol policy. Heineken's first marketing codes go back to the 1960's and contain provisions forbidding the targeting of underage people. Today, the code we enforce is much wider ranging. Any advertising, marketing or promotion for any of our brands must comply with our internal Rules for Responsible Commercial Communication.

Under our Rules, our advertising must never encourage, glamourise or celebrate alcohol misuse. Our brand communication must only target adults who are above the legal drinking age; and never feature people who are, or appear to be younger than 25 years of age; our advertising is only permitted to appear in media whose audience is more than 70 per cent of legal drinking age or above; and our advertising and promotion is not permitted to link beer consumption with sexual or social success.

Ensuring that our commercial communication does not intentionally or unintentionally encourage any form of irresponsible consumption is not the only focus of our Rules. Alongside this responsible marketing, we are increasingly challenging ourselves and our agencies to channel our creative energy into advertising and messaging which markets the concept of responsibility. This means that including communications to combat alcohol misuse directly in concept and messaging will be one part of our marketing campaign objectives.

2. *Enjoy Heineken Responsibly*

Heineken is by a considerable distance the world's most widely distributed and most valuable premium beer brand. We believe that with this leadership comes a role for action.

Message on TV, labelling and packaging

In 2004, we introduced the message "Enjoy Heineken Responsibly" on all bottles, cans and packaging and commercial communication of the Heineken brand globally, and the message forms a distinct communication platform for the Heineken brand. In markets such as Italy, the Netherlands, Greece and the USA, the platform has already been used for dedicated television advertising.

Dedicated internet platform

In addition and uniquely, in order to help remind consumers and support informed decisions and choices, the on-pack message is accompanied by a logo displaying the 'www.enjoyheinekenresponsibly' internet address. The website is now available in 22 languages in 30 countries and is the basis for websites we are developing and launching for other brands in the Heineken portfolio.

Inclusion in brand architecture

The concept of responsibility and responsible consumption is now a dedicated pillar of the Heineken brand's architecture worldwide. In practical terms, this means that in any brief for any advertising or promotion, the concept of responsibility needs to be considered and included in the creative development process.

Integrated in sponsorships

The Heineken brand is also involved in high-profile international sponsorships such as the UEFA Champions League. In each of these platforms, the responsibility message is being integrated into the exploitation. As an example, the highest profile pitch-side advertising at all of this season's UEFA Champions League games will carry the 'Enjoy Responsibly' message. In addition, airtime is also given over to the message in the dedicated television advertising breaks.

3. Other Brands

All of our major brands at a regional and national level are instructed to carry a responsibility message on the label and/or on the packaging. In addition, they have a dedicated brand website (based on the "Enjoy Heineken Responsibly" website) in their own language which spells out the impact of alcohol and the consequences of misuse and abuse.

4. Employees as Ambassadors – Cool@Work

We believe that our employees are the ambassadors of our Company. To this end, a core, Company-wide programme, Cool@Work, provides employees with information on the meaning of responsibility and training when necessary. Specific elements such as sales force training and support for individuals who may have a problem dealing with alcohol are also elements of the programme. It is mandatory that all employees are made aware of their special responsibility as Heineken employees at least once every two years. The operating companies have implemented to Cool@Work program under supervision of our Group Head office.

Compliance with all three strategic pillars of our Alcohol Policy is subject to periodic audit by our Group Internal Audit department and the results are shared with the responsible Regional

Presidents, Group Functional Directors and the Executive and Supervisory Board members.

4. Responsibility activities in Partnership

In line with our view that alcohol and society issues require multiple, integrated approaches, in the last few years, Heineken has increased its co-operation with groups, NGOs, governments and organisations on specific projects which aim to reduce alcohol related harm.

As an organisation, we now support partnership activities in approximately 30 markets. The activities are numerous. They include high profile messaging, advertising and age verification initiatives with local authorities at high-profile summer festivals in for example Poland, Italy and Romania.

In Nigeria we work with the Federal Route 50 Commission in a 4-month campaign in 6 major cities in order to reduce driving while intoxicated. Drink driving and underage drinking are also focus areas in Thailand, where we support the Don't Drink and Drive Foundation and have alcohol testing at sponsored events.

5. Co-operation with in the industry

Alongside the work described above, which we undertake sometimes globally for all Heineken companies and sometimes regionally or locally by our local operating companies, we also believe in working together with other industry members to reduce alcohol related harm on a global, regional and national level. We put this belief into practice via active membership of, and participation in, international trade associations (such as the Brewers of Europe and International Centre for Alcohol Policies), national brewers associations and Social Aspect Organisations (such as the Portman Group in the UK, Stiva in the Netherlands and Entreprise et Prevention in France). Through these memberships, we invest in research, advertising and educational campaigns aimed at a reduction in alcohol-related harm.

We are also highly active in mobilising any parts of our industry that are not yet engaged with the harm reduction agenda. We support the submissions that both The Brewers of Europe and the International Centre for Alcohol Policies have made to the World Health Organisation.

We value the opportunity to make this initial, short submission which we hope will and can be followed by further dialogue with WHO and other stakeholders on this complex issue.

It is our belief that the more the industry as a whole is engaged in both the debate on the issues and their solutions, the more impact we believe we will have in helping to address alcohol related harm.

Amsterdam, 14 November 2008

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FORUM DER DEUTSCHEN WEINWIRTSCHAFT

Heussallee 26 • • 53113 Bonn

14.11.2008

Contribution of the *Forum der Deutschen Weinwirtschaft*

The *Forum der Deutschen Weinwirtschaft* represents the entire German Wine Sector and is consulted by the Deutsche Weinakademie (DWA) in scientific matters. We are committed to promoting responsible wine consumption and to being part of the solution with regard to tackling alcohol misuse.

Wine is more than an alcoholic beverage; it is an agricultural product with a long tradition. The consumption and enjoyment of wine is part of German life and culture. The majority of wine drinkers consume wine responsibly and wine is compatible with a healthy lifestyle.

However, the wine sector recognises that wine contains ethanol and acknowledges the health risks and the negative social and economic impact by the misuse. Moreover, it hurts our legitimate business activities as well as our image. We realize the need to address harmful use, especially by young people, and are determined to play a constructive role in these discussions.

WHO Question 1:

What are your views on effective strategies to reduce alcohol-related harm?

Effective strategies....

- do not focus on the total alcohol consumption as such because it has little impact on misuse; what needs to be addressed is the **harmful use** of alcoholic beverages and to target the respective risk groups (particularly young people).
- need to be realistic, have long-term objectives and should be free of any ideologies. The implementation has to be practical and evidence-based.
- consider the various regional and cultural differences as well as traditions.
- encourage moderate wine consumption as well as responsible drinking pattern as a social norm.
- recognize the pleasure and health benefits of moderate wine consumption

Eine Arbeitsgemeinschaft der Bundesorganisationen der deutschen Weinwirtschaft:
Bundesverband der Deutschen Weinkellereien und des Weinfachhandels • Deutscher Weinbauverband •
Deutscher Raiffeisenverband • IHK Trier für den DIHK • Verband Deutscher Weinexporteure

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- recognize that education and training are essential to promote sensible drinking pattern and cultural change with regards to alcoholic beverages and as a consequence reduce alcohol related harm in the long-term
- provide citizens with accurate and relevant information to allow them to make responsible drinking decisions
- integrate all relevant stakeholders, including the economic partners/industry contributing to solutions because alcohol related harm is a problem that concerns the society as a whole
- recognize that industry self-regulation of commercial communications is a responsive and effective way
- support the enforcement of existing national laws and regulations

WHO Question 2:

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

The German Wine Sector is convinced that the most appropriate ways to tackle alcohol-related harm consist of

- education
- enforcement of existing laws
- effective self-regulation of commercial communications
- partnerships at international, national and local level with government and all stakeholders involved.

We support

- existing interventions and effective measures designed to decrease the harmful use of alcoholic beverages among a minority of drinkers.
- positive approaches to encourage responsible drinking pattern
- evidence-based education and prevention programs, which are the best way to achieve behaviour change. The goal is not to establish an alcohol-free society but a society which consumes alcoholic beverages in a responsible manner and where moderate drinking pattern are established as a social norm.

Research data show that

- Drinking pattern of adults are reflected in the drinking pattern of young people: ie. young people in Mediterranean countries show a lower binge drinking rate than their Northern European counterparts.
- Harmful drinking pattern (binge drinking) as well as the amount of alcohol consumed at each drinking occasion is considerably lower in the predominantly wine producing and wine drinking countries.

- measures that focus on risk groups such as pregnant women, children and young people, (young) drivers
- existing regulations and enforcement of respective laws (ie. Law for the protection of children and youth: minimum purchasing age for wine and beer is 16 years, for spirits 18 years)
- the effective implementation of national self regulation codes
- an approach in partnership with all stakeholders to identify effective strategies to prevent alcohol misuse

We oppose

- an one-size-fits-all approach with population based restrictions aiming to reduce the alcohol consumption of society as a whole and compromising the pleasure of the majority who consume responsibly
- broad-based restrictions such as general restrictions for commercial communications and availability or tax increases designed to decrease alcohol consumption of society as a whole because
 - this punishes all consumers and not the minority who misuses alcoholic beverages
 - this restricts consumers in their basic rights and freedom
 - this leads to illicit alcoholic products through an increased a black market activity, illegal cross-border purchases, smuggling, home-produced alcohol.

Question 3:

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

Commitment to collaboration

We are prepared to collaborate with WHO, Member States and others to tackle misuse and related harm in cost effective and appropriate ways. Our sector has participated in previous WHO consultations, and is committed to work collaboratively on effective, evidence-based approaches going forward.

Commitment to the Alcohol & Health Forum

The European Wine Sector is represented in the Alcohol & Health Forum which aims to provide a common platform for all relevant stakeholders to address alcohol related harm. This action-oriented approach of the EU Commission and the EU Member States with all stakeholders at one table is an excellent opportunity to address solutions for alcohol misuse. Such a multi-stakeholder approach should be regarded as example for similar platforms at national and local level.

Commitment to German implementation of European programme

Our commitment to the Alcohol & Health Forum focuses on the trainees of the German wine sector. For this purpose, the German Wine sector is implementing a pan European programme called “Wine in Moderation, Art de vivre” and its objective is to reduce alcohol misuse and help young people and adults to make informed decisions about drinking. The Wine Strategy focuses on misuse as opposed to total consumption and recognizes the cultural dimension and drinking pattern.

Initially, the target group for this programme are multipliers of the wine and sparkling wine sector. The moderation message is integrated into the training of the programme trade schools, sommeliers schools, colleges and universities. These multipliers act as ambassadors and then disseminate the moderation message to the consumers.

Content of the education seminar:

- Wine- a product of tradition and culture
(with strict regulations in the wine making process)
- Wine - part of a healthy lifestyle
(balanced diet, low risk drinking pattern such as wine should be savoured and consumed slowly with meals, always in combination with water)
- Benefits and risks
(impact of misuse, blood alcohol concentration (BAC), assessment of individual BAC, contra indications)
- The legal environment
(knowing and understanding the laws, minimum purchasing age, implications of not complying with the regulations)
- Wine communication standards
(existing national self regulation code)

We support in all our activities the basic concept of the moderation message which has been disseminated by the German Wine Sector for more than a decade in the form of the “Guidelines For Responsible Wine Consumption”:

- Wine has been a tradition and part of the culture throughout civilization
- Wine consumption should be part of a lifestyle which avoids misuse.
- Especially young people should be informed about the advantages and disadvantages of wine consumption. This way they can learn about the enjoyment of wine drinking in a civilized manner.
- Moderate wine consumption has positive effects on the cardio-vascular system and diabetes. For healthy adults of average body weight and height, a daily alcohol amount of 20 g for women and 30 g for men is considered low risk.
- Excluded from these recommendations on moderate daily wine consumption are children and teenagers, pregnant women and individuals who are alcohol-

dependent or at risk to become alcohol-dependent or who are taking certain medications or alcohol at the workplace (so called “Punktnüchternheit” which means no alcoholic beverages in certain situations or circumstances)

These guidelines have been included in all seminars for health professionals such as physicians and nutritionists.

Special emphasis is placed on campaigns in cooperation with other sectors of alcoholic beverages targeting young drivers

- signing and committing to the European Road Safety Charter
- “*Don’t drink and Drive*” campaigns.

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FORUM PSR full contribution to WHO consultation on ways of reducing harmful use of alcohol

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

We believe, that the best way of reducing alcohol related harm is targeted prevention in combination with the enforcement of existing laws.

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

We do not believe that there can be a global approach to reduce problems related to harmful use of alcohol. The reason are many different traditions and alcohol cultures. A strategy, which may be appropriate in one country may not work at all in another one. Besides that, there are islamic countries with alcohol prohibition and there are countries with a thousands year old tradition of alcohol use - a global approach doesn't make sense.

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

Our organisation is contributing to the reduction of harmful use of alcohol in various ways.

Self-Regulation:

Members of our organisation are global players in the spirits business and they're covering more than half of the Czech spirits market. They've signed a Code of Ethics (<http://www.forum-psr.org/en/eticky-kodex>) which endorses responsible consumption of alcoholic beverages and regulates commercial communication. During the four years of the organisation's existence we've three times complained to the Czech Advertising Standards Council (Rada pro reklamu - www.rpr.cz) about irresponsible spirits advertising. In two cases the complaint has been accepted, once it's been rejected.

As the major spirits advertisers in Czechia we've contributed to an increase in responsibility of the commercial communications of the spirits industry.

Designated Driver

In cooperation with our partners BESIP (Road Safety Department of the Czech Ministry of transportation) and the Responsible Brewers Initiative we've been participating in a designated driver campaign for four years now, which aims to help reducing the number of road traffic injuries and fatalities attributed to drunk-drivers by promoting the designated driver concept especially among young adults in order to achieve a mind-shift changing the behaviour of the target group. The campaign accompanies four of the most popular Czech pop/rock bands Wanastovi Vjegy, Divokej Bill, Tri sestry and Chinaski on their concert tours. The bands promote the designated driver concept during their concerts. Before and after

the gigs promotional teams introduce the concept to the audience during discussions on the subject, give away POS-materials (T-shirts, leaflets, stickers) and measure the blood alcohol level.

Altogether 30 big concerts are taking place this year, the expected audience is about 70 thousand visitors. Target audience are especially young drivers, as it's them who cause the most of these accidents. The campaign is accompanied by a PR campaign promoting the designated driver concept.

More information is to be found at www.domluvme-se.cz

Education and Prevention

www.pobavme-se-o-alkoholu.cz

In order to increase the awareness of alcohol and its implications among young people we've launched the educative preventional website www.pobavme-se-o-alkoholu.cz. The website aims to improve young people's awareness of the effects of alcohol on the immature body, to increase knowledge and awareness of the risks associated with alcohol consumption by those who are under age, also to raise awareness among young people of the laws restricting the purchase and consumption of alcohol, and why these exist and to underline that the idea that abstinence is a valid option.

The website is designed for young people in schools throughout the whole country.

Background of the site is the long-term rise of alcohol use by minors.

Website has three pillars:

- An interactive part to be used by young people in their leisure time targeted at 11 to 16 year olds
- Work sheets to assist teachers to address alcohol in scientific or civic education curricula
- Information and guidance for parents to discuss alcohol with their children

www.pijsrozumem.cz

A similar project is the Czech drinkaware website www.pijsrozumem.cz. The target group is the broad public throughout the country and the objective of the website is to promote responsible consumption of alcohol beverages and raise knowledge and awareness about alcohol as such and its impacts.

The awareness of the fact, that alcohol may cause a number of problems is rising in the Czech population, but proper knowledge about alcohol and responsible drinking is lacking. The pijsrozumem.cz website provides ballanced information on alcohol and its broad range of effects and promotes responsible drinking. It is promoted through POS-materials of the members' brands.

CONTRIBUCIÓN A AUDIENCIA PÚBLICA DE LA OMS, SOBRE REDUCCIÓN DEL USO NOCIVO DEL ALCOHOL

Cervecería Nacional S.A., es la más grande empresa de la industria Cervecera en el Ecuador, con más de 120 años de trabajo haciendo historia en el país. Entre su productos cuenta con cinco marcas de cerveza, aguas y bebida nutritiva a base de malta. Es una empresa reconocida por todo el aporte que ha brindado al desarrollo del país, directamente a través de la generación de empleo y fuentes de riqueza a miles de ecuatorianos, así como por sus planes de desarrollo sostenible e inversión social, apoyo a la educación, cultura y deporte. Desde hace varios años, es auspiciante principal de la selección ecuatoriana de fútbol, y de los equipos de mayor prestigio en el país. . Todo lo cual la ha convertido en una de las empresas más respetadas en el Ecuador y sus productos los preferidos en elección.

Cervecería Nacional actúa responsablemente con la comunidad en la que opera y con sus consumidores, llevando a cabo campañas permanentes para disminuir los efectos nocivos del abuso del alcohol, así como erradicar el consumo de cerveza en los menores. Para lo cual cuenta con políticas de alcohol claramente definidas para sus empleados y códigos de autorregulación comercial para evitar la exposición a menores de publicidad que pueda incentivar o promover el consumo, liderando campañas de prevención y concientización.

Por este motivo, nos sentimos con el derecho a presentar ante esta Organización, nuestro criterio sobre las eventuales estrategias que deben considerarse para lograr a disminuir los efectos nocivos producidos por el abuso y el consumo irresponsable de alcohol.

Es condición fundamental, para el establecimiento de cualquier tipo de estrategia, partir de premisas claras sobre sus motivaciones, y en consecuencia, sobre sus objetivos. Caso contrario podemos caer en el error de fracasar, provocando eventualmente mayores perjuicios que los que se pretenden evitar.

En ese sentido, y en relación con los daños producidos por el alcohol, debemos dejar sentado que dichos efectos surgen como consecuencia del abuso y del consumo irresponsable de bebidas alcohólicas, ya que un consumo moderado está perfectamente en armonía con un estilo de vida saludable.

Aceptando esta realidad, en el diseño de una adecuada estrategia para reducir el impacto de los efectos nocivos, provocados por el abuso y/o consumo irresponsable del alcohol, se debe de tener en cuenta lo siguiente:

a) Corresponsabilidad:

Todos los actores de la sociedad tenemos que asumir nuestro grado de responsabilidad en este

problema que nos afecta a todos, seamos sujetos activos o pasivos del problema. De tal forma que los gobiernos, sociedad civil organizada, consumidores, industria productora, medios de comunicación, debemos de participar activamente. Cualquier esfuerzo aislado, que no cuente con la colaboración de todos estos actores, se verá limitado en sus efectos y sostenibilidad.

Estos deberán empezar por reconocer el problema, identificar su parte de responsabilidad y establecer acciones en común que permitan lograr los objetivos deseados.

b) Información:

Lastimosamente en el tratamiento de este problema por parte de muchos actores, ha primado la falta de información adecuada y percepciones infundadas sobre las causas y sus efectos.

Por este motivo, será fundamental que se cuente con investigaciones serias que nos permitan llegar a conclusiones determinantes sobre las diferentes aristas relacionadas con este problema. Por ejemplo, es fundamental que se logre un consenso, en base a información científica, sobre qué constituye consumo nocivo. En la evaluación de esta información deben considerarse las variables en función a regiones, condiciones y estilos de vida, influencia cultural, etcétera, que generan patrones de consumo que pueden variar sustancialmente entre países e incluso entre regiones de un mismo estado. Las políticas e intervenciones para resolver estos problemas no pueden ser globales, sino diseñadas de acuerdo a las circunstancias específicas a resolver.

c) Justicia:

Cualquier estrategia debe considerar la realidad de la industria del alcohol, donde actúan por una parte: la industria formal, sometida a los controles y escrutinio público; y por otro, la industria informal, que desde la clandestinidad, poco a poco ha ido ganando terreno, en particular por la imposición de restricciones cada vez mas fuertes al comercio formal. Con lo cual, se deberá cuidar que estas estrategias no incentiven las prácticas ilegales y por el contrario, permitan la transparencia de la industria que ante reglas claras y justas, asuman su actividad de manera responsable en coordinación con el resto de actores sociales.

Por esta razón, debe de entenderse que las consecuencias nocivas producto del consumo irresponsable, en gran medida se deben a la existencia de esta creciente industria informal, que no solo evade sus obligaciones impositivas y regulatorias, sino que principalmente atenta contra la salud pública por la falta de inocuidad de sus productos.

En nuestro caso, Cervecería Nacional S.A. en estricto apego sus políticas de responsabilidad social corporativa, trabaja permanentemente en sus compromisos con sus consumidores, colaboradores, con la sociedad y con el estado.

1) Consumidores:

Provee de manera clara y transparente, adecuada información sobre los productos, así como advertencias sobre las consecuencias del uso irresponsable de los mismos.

Cervecería Nacional, está implementando campañas que promueven el Consumo Responsable, concienciando sobre la adecuada forma de disfrutar nuestros productos, y proveyendo de herramientas preventivas antes situaciones de mayor riesgo. Tales como la Campaña de Conductor Designado, que busca generar una cultura de responsabilidad a la hora de consumir alcohol y manejar, donde procuramos también la colaboración de la autoridad a la hora de sancionar a los infractores de conformidad con la ley.

2) Sociedad:

Es necesario actuar responsablemente, cuidando los mensajes e imágenes que contienen los anuncios publicitarios, así como los lugares y condiciones de expendio. Para lo cual resultan valiosos los esfuerzos por contar con Códigos de Regulación Comercial y la suscripción de Códigos de Autorregulación de toda la industria cervecera.

Para Cervecería Nacional, constituye un tema de gran importancia la estrategia para erradicar el consumo de alcohol por parte de los menores de edad (< 18 años). La cual consta de tres componentes fundamentales:

1.- Educación y Concienciación: Programas especialmente diseñados para prevenir el consumo por parte de menores de edad, procurando demorar al máximo el momento de contacto de este grupo vulnerable con el alcohol, donde participan los menores a partir de los 11 años, los padres de familia y educadores. Inicialmente se realizarán programas pilotos a determinadas escuelas y colegio, para luego con la colaboración de las autoridades locales y nacionales, extender a la mayor cantidad de menores de todo el país.

2.- Participación ciudadana: Alentando a toda la sociedad con mayoría de edad, a que se constituyan en actores permanentes en esta cruzada de erradicación del consumo por parte de menores de edad. Para esto se le provee de herramientas para actuar ante situaciones de riesgo, llamando la atención de la industria y las autoridades. Nuestra empresa se compromete a aplicar medidas de sanción ejemplificadas.

3.- Autorregulación: Capacitando y controlando toda la cadena de comercialización, para evitar actitudes contrarias a esta causa.

3) Colaboradores: Como embajadores de la industria, contamos con una Política de Alcohol para Empleados el cual debe ser respetada por todos los colaboradores, a quienes además de

informar sobre la importancia de consumir responsablemente, afirme su responsabilidad para con la compañía.

- 4) **Estado:** Nuestra empresa adecua su conducta a las normas legales relativas a la producción, promoción y comercialización de bebidas alcohólicas, cumpliendo íntegramente con las obligaciones fiscales. Cervecería Nacional colabora en la promoción en el control del mercado informal de alcohol, que evade sus responsabilidades y afecta a la salud pública.

Tal como hemos dicho anteriormente, este es un problema en cuya solución debemos aportar todos. En tal sentido consideramos que a nivel global la actuación de la Organización Mundial de la Salud es de relevante importancia para promover la adecuada investigación y proveer a los profesionales de la salud de la información necesaria para los distintos programas de prevención a nivel local, así como articulando espacios de discusión como el actual.

Guayaquil, 14 de noviembre de 2008.

SABMILLER PLC.

**SUBMISSION TO THE WORLD HEALTH ORGANIZATION'S
PUBLIC HEARING ON WAYS OF REDUCING
THE HARMFUL USE OF ALCOHOL**

14 NOVEMBER 2008



SABMILLER PLC.
SUBMISSION TO THE WORLD HEALTH ORGANIZATION'S PUBLIC HEARING
ON WAYS OF REDUCING THE HARMFUL USE OF ALCOHOL
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SUMMARY

SABMiller welcomes this opportunity to introduce its views on reducing harmful use of alcohol. We hope to engage in an ongoing exchange with the WHO, its members, and all relevant stakeholders, to develop and implement a successful global strategy.

Effective alcohol-related policies and strategies must address local realities, including the importance of markets for informal and illicit alcohol. To reduce harms related to informal alcohol, reliable data must be collected, and balanced and transparent information on best practices widely disseminated. Policies should be designed to encourage regulated production of a wide range of quality alcohol beverages that are affordable to adults who choose to drink – offering an alternative to informal alcohol and the additional public health risks it brings. We attach a chart describing the spectrum of beverage alcohol in Sub-Saharan Africa – including the supply of informal alcohol, which will not subside through taxation and restrictions on regulated products.

Effective strategies must be rooted in comprehensive national and sub-national alcohol policies, crafted through participatory processes that engage stakeholders from all relevant sectors – including health, law enforcement, justice, trade, and education, as well as NGOs, producers, and retailers. Broad participation brings the benefits and checks and balances of a range of experience and perspectives, raises awareness among participants, instills political commitment, and lays the ground for successful implementation of the policy.

We concur with WHO that health sector responses are effective and cost effective. Developing adaptable public health sector tools and making them widely available is among WHO's core competencies, and will be a critical part of the WHO's contribution to the global strategy.

With its expertise, reputation and global reach, the WHO's role is vital. WHO can promote broad participation and assist members' efforts to develop and implement national alcohol policies. WHO can facilitate public-private partnerships to: (i) collect and make available transparent data, (ii) design and disseminate adaptable health sector tools to identify and treat harmful use of alcohol, and (iii) collect and disseminate best practices, supported by transparent data sets for ease of analysis and transferability.

With their intimate knowledge of local markets around the world, and experience implementing alcohol-harm reduction programmes, producers like SABMiller also have a vital role, and should engage and partner with the WHO, its members, and other stakeholders to: (i) offer on-the-ground expertise and commitment to the development, implementation, and evolution of comprehensive national alcohol policies, (ii) collect and make available transparent data, (iii) translate policies and data into programmes that effectively respond to local realities, (iv) identify and share best practices and related data, and (v) commit to responsible business practices.

Indeed, SABMiller believes that, notwithstanding the success of its alcohol harm reduction programmes, its most significant contribution to reducing the harmful use of alcohol stems from the deep social and economic benefits it brings to host countries, promoting achievement of the UN Millennium Development Goals, and helping to eradicate the extreme deprivation that fosters alcohol abuse.

Finally, we would encourage the WHO to give full effect to member states' request in resolution WHA61.4 by consulting with stakeholders throughout the development and implementation of the global strategy, on all ways they could contribute to reducing harmful use of alcohol. The WHO's recent roundtable consultation with economic operators covered only three of the nine action points described in the Secretariat's report – though participants sought to discuss other areas where they could offer meaningful input – including reducing harms of informal alcohol.

Inclusive, participatory processes are necessary to develop successful alcohol policies – not only for national approaches, but also for the global strategy. Multi-stakeholder debate incorporates the checks and balances of a broad range of experience and perspectives, and ensures the necessary buy-in for successful implementation. We hope the WHO will consider hosting multi-stakeholder consultations to address each of the action points to reduce harmful use of alcohol – and that it will host another public hearing to solicit comments once the draft of the global strategy has been prepared.

I. EFFECTIVE STRATEGIES TO REDUCE THE HARMFUL USE OF ALCOHOL

*The public health problems caused by the harmful use of alcohol are multidimensional and complex, with significant differences in consumption levels, drinking patterns and drinking contexts between countries and regions.*¹

Effective strategies to reduce the harmful use of alcohol must take into account the local realities in which the harmful use takes place. Drinking patterns in Malawi differ from those in South Africa, Colombia or Norway; strategies to change them must also differ.

Regulatory measures undertaken without regard to local circumstances can bring unintended consequences, exacerbating the harm they were meant to alleviate. An approach that assumes a given set of strategies would suit all WHO members would in practice suit few, if any. Effective alcohol policy must match local realities – so the best policies are local ones: national and sub-national alcohol policies, developed and implemented with the engagement and commitment of all relevant stakeholders.

Before discussing national alcohol policies, we first discuss why the old paradigm of raising taxes and restricting availability does not produce the intended effects. These measures increase, rather than decrease, consumption of illicit and informal alcohol, and thwart the social and economic benefits the alcohol industry brings.

¹ World Health Organization, *Strategies to reduce the harmful use of alcohol: Report by the Secretariat*, WHA61.13, 20 March 2008, at p. 3.

A. Effective strategies must address informal alcohol.

Any strategy that seeks to reduce alcohol related harm must also seek to reduce the harms of informal and illicit alcohol.

The market for alcohol beverages covers a spectrum of products, from the regulated market to the informal and illicit markets.² Only regulated alcohol that is taxed and sold in licensed outlets is subject to measures to reduce per capita alcohol consumption. Such measures – including making alcohol more expensive, and restricting its availability – not only fail to target and reduce harmful drinking, but they may also increase it, by driving consumers to turn to informal markets. Low-income consumers are at highest risk of suffering the consequences of such policies, as they are quickly priced out of the market for regulated, high quality commercial products.

Informal alcohol refers to beverages which are outside of government controls, including traditional alcohol beverages produced at home or by small producers, and illicit, counterfeit, and smuggled beverages. Alcohol consumption statistics do not include informal alcohol, and thus leave a large percentage of consumption “unrecorded.” The WHO has recognized that such statistics are of limited value given the significance of unrecorded consumption:

In most cases, adult per capita (APC) alcohol consumption is useful for looking at population level trends in alcohol consumption, but they do not include unrecorded alcohol consumption, which in some countries is actually the majority of the alcohol available.³

Unrecorded consumption of informal alcohol is a significant issue for a great number of developed and developing country WHO members. In East Africa, an estimated 90% of consumption of alcohol is unrecorded; in Norway, levels are reportedly 25-30% of total alcohol consumption.⁴ The WHO recognizes that informal alcohol is not monitored for quality and strength, and is frequently associated with public health crises and deaths caused by impurities and additives.⁵ Several countries intervened during the discussion on alcohol at the 61st WHA to call attention to the importance of the informal market.

The WHO Secretariat recognized the importance of strategies to address the public health impact of illegally and informally produced alcohol, noting that the evidence base in this area is weak, but that it “points towards a combination of community mobilization and enforcement and control.”⁶

² See, e.g., Annex I, a document that charts the spectrum of beverage alcohol in Sub-Saharan Africa, based on SABMiller’s observations and experience.

³ World Health Organization, *Global Status Report on Alcohol 2004*, at 17.

⁴ *Ibid*, at 15-16.

⁵ The WHO cites an incident of a poisonous liquor illegally brewed in poor neighborhoods of Kenya that took the lives of 140 people, caused blindness in others, and hospitalized hundreds more. (*Ibid*, at 18.) Such incidents occur all too often. There were reports that, just prior to the 61st World Health Assembly, over 180 people in poor and rural neighborhoods in southern India died after drinking locally brewed alcohol tainted with chemicals, sold after police closed shops and bars during a state election to avoid violence and maintain law and order. “India pays dear for cheap hooch,” *AsiaTimes* 29 May 2008, online at http://www.atimes.com/atimes/South_Asia/JE29Df01.html (last retrieved 23 October 2008).

⁶ World Health Organization, “Strategies to reduce the harmful use of alcohol: Report by the Secretariat,” WHA61.13, 20 March 2008, at p. 5.

With this in mind, SABMiller believes the global strategy is an opportunity for the WHO to partner with its members and other stakeholders – including economic operators – to address the informal market, with such actions as:

1. Collecting data regarding informal markets and products;⁷
2. Disseminating balanced information on best practices to reduce harm from consumption of informal alcohol, including community mobilization efforts, and
3. Encouraging policies that promote the production of a wide range of commercially produced quality alcohol beverages that are affordable to adults who choose to drink – offering an alternative to informally produced products.⁸

B. The most effective strategies are rooted in comprehensive alcohol policies, developed and implemented at the national and sub-national levels, with the engagement and commitment of all relevant stakeholders.

Developing and implementing a national alcohol policy is in itself an effective strategy to reduce the harmful use of alcohol – but one that must be undertaken at the national and sub-national levels, and not at the global level.

Since national alcohol policies must respond to local realities, they must be crafted through a participatory process that engages all relevant stakeholders from various sectors – including health, law enforcement, justice, trade, and education, as well as special interest groups, NGOs, producers, and retail trade. Broad participation brings the benefits and checks and balances of a range of experience and perspectives, raises awareness among participants, instills political commitment, and lays the ground for the development of a national alcohol committee or other partnership to oversee the implementation of the policy.

A national alcohol policy is an instrument with which a government can balance the rights of adult members of the community who wish to purchase and consume alcohol in moderation, with its duty to protect the community from harms associated with the abuse of alcohol. Its objective is to prevent and minimize alcohol-related harm to individuals, families and communities in the context of developing safer and healthier patterns of drinking. At the societal level, it would address such issues as providing effective treatment and support services, ensuring public safety, creating an informed society, and protecting consumers from unsafe products. At the level of individuals, it would address such issues as prevention of underage drinking, drink-driving and reducing alcohol misuse among pregnant women and other at-risk populations, increasing understanding of the harms of misuse and the benefits of

⁷ Recommended in, Lachenmeier, Dirk W., Jürgen Rehm, and Gerhard Gmel, “Surrogate Alcohol: What Do We Know and Where Do We Go?” *Alcoholism: Clinical and Experimental Research* Vol. 31 No. 10: PP 1613-1624.

⁸ See, e.g., the Eagle Lager project, undertaken by SABMiller’s Ugandan operation, which was developed to provide Ugandans with an affordable quality beer made from locally produced sorghum. In partnership with the Ugandan government, the Eagle Lager project has stimulated agricultural research and development into the use of sorghum for brewing and created a permanent and stable market for 8,500 local sorghum farmers. “Eagle Lager: Uganda and Zambia (SABMiller),” in Jenkins, Beth, Anna Akhalkatsi, et al., *Business Linkages: Lessons, Opportunities, and Challenges*, IFC, International Business Leaders Forum, and the Fellows of Harvard College, 2007, online at http://www.hks.harvard.edu/m-rcbg/CSRI/publications/report_16_BUSINESS%20LINKAGESFINAL.pdf.

moderate drinking, and enabling individuals to make informed decisions based on accurate and balanced information.⁹

The global strategy is an opportunity for the WHO to:

1. Support member states' efforts to develop, implement, and evolve national alcohol policies through a participatory process that secures the input and commitment of all relevant stakeholders; and
2. Disseminate best practices and relevant data to facilitate implementation of national policies.

C. Alcohol regulations must be enforced, and penalties for their infringement must be meaningful.

Strategies to reduce alcohol-related harm that rely on law enforcement – such as drink-driving laws and restrictions of sales to minors – will not be effective in the absence of strict enforcement and the application of meaningful penalties.

1. WHO members should strengthen law enforcement and meaningful penalties for infringement of alcohol-related laws and regulations.

II. BEST WAYS TO REDUCE HARMFUL USE OF ALCOHOL – FROM A GLOBAL PERSPECTIVE

A. Evidence-based, targeted health sector interventions are the most effective tools to reduce the harmful use of alcohol; designing and disseminating them should be a major focus of the WHO's contribution to the global strategy.

We concur that health sector responses effectively reduce harmful use of alcohol¹⁰ – in addition, they do not trigger the unintended consequences of strategies to reduce overall consumption.

SABMiller is concerned by the WHO's continued endorsement of population-based strategies designed to reduce overall consumption of alcohol. Such policies neither specifically target the harmful use of alcohol, nor address the use of informal or illicit alcohol – and indeed, they may exacerbate these problems by driving more low-income, high-risk consumers into the informal and illicit markets. They also raise the cost of doing business for legitimate, well-managed companies, and potentially erode the intellectual and physical resources, employment, and revenue they bring, particularly to developing countries.

The WHO is best placed to direct its public health expertise and resources to developing and making widely available tools and guidelines to help communities implement early screening and brief interventions in various health settings. This is among the WHO's core

⁹ This is an illustrative, rather than an exhaustive, list of examples.

¹⁰ In its report to the 61st World Health Assembly, the WHO Secretariat recognized that, “[h]ealth-sector preventive measures against hazardous and harmful alcohol consumption, such as screening and brief interventions, have proven to be effective and cost-effective in reducing alcohol consumption and alcohol-related harm.”

competencies; no other intergovernmental organization could fill this gap – and the gap is significant.¹¹

We believe the best ways to reduce the harmful use of alcohol from a global perspective include:

1. WHO should promote and facilitate partnerships to develop and implement evidence-based harm-reduction approaches, including those described throughout this submission;
2. WHO should assist members to provide easy access to treatment for alcohol abuse;
3. WHO should develop and make available to public health authorities adaptable tools and resources to implement targeted health care interventions;
4. WHO should promote and facilitate widespread implementation of early identification and brief intervention programmes in primary care, social welfare, and emergency department settings;
5. WHO should facilitate training of public health, educators and law enforcement personnel about identification and intervention programmes; and
6. WHO and its members should collect and disseminate fully transparent data about best practices for evidence-based harm-reduction approaches.

III. HOW SABMILLER CAN CONTRIBUTE TO REDUCING THE HARMFUL USE OF ALCOHOL

A. Achieving the UN Millennium Development Goals (MDGs) will contribute to reducing the harmful use of alcohol. Responsible businesses like SABMiller contribute to the achievement of the MDGs.

Responsible businesses bring to host countries significant benefits that promote achievement of the Millennium Development Goals (MDGs). Indeed, SABMiller was a signatory to the 2007 private sector “Declaration on the Millennium Development Goals.”¹²

Harsh social and economic living conditions contribute to abusive use of alcohol.¹³ The WHO has recognized that from a policy perspective, it is not enough to address individual cases of addictive behaviors – we must also address “the underlying patterns of social

¹¹ A report released on 29 October 2008 by the British National Audit Office, *Reducing Alcohol Harm: health services in England for alcohol misuse*, noted: “Fewer than half (47 per cent) of the [general practitioners in the UK] surveyed felt they had adequate training to recognize alcohol related health problems in their patients. Similarly, only half of GPs (56 per cent) reported having undertaken alcohol misuse training during their basic medical training.”

¹² See, <http://www.dfid.gov.uk/mdg/declaration-private-07.asp>

¹³ *Social Determinants of Health: The Solid Facts*, 2nd ed., World Health Organization Regional Office for Europe, 2003, at 24.

deprivation in which the problems are rooted.”¹⁴ Eradicating extreme deprivation is a key objective of the MDGs. As a member of the UN System, the WHO must promote achievement of the MDGs, and any strategy the WHO promotes to reduce the harmful use of alcohol must not be at odds with the MDGs.

SABMiller plc has a brewing presence in more than 60 countries on six continents – 31 of them on the African continent – and employs roughly 60,000 members of local workforces. We bring important benefits to the markets in which we do business, by running successful, ethical companies that produce safe, high quality products. These benefits contribute to the realization of the MDGs, and thus, both directly and indirectly contribute to reducing the harmful use of alcohol:

- i) Boosting local economies through tax revenue and infrastructure investment;
 - ii) Reducing poverty and developing capacity and intellectual capital of local workforces through fair employment;
 - iii) Investing significant resources to bridge gaps in local infrastructure – ranging from building roads and providing funding to universities and educational systems, to offering healthcare to employees and operating free clinics for treatment of HIV/AIDS;
 - iv) Investing significant resources into a broad range of social responsibility programmes, including but not limited to programmes to reduce the harmful use of alcohol;
 - v) Implementing employee alcohol policies, to establish uniform standards for responsible alcohol consumption during work events, while at company facilities, and outside the workplace. These ensure a safe workplace for and develop positive drinking patterns among employees. We offer treatment for employees who are alcohol dependent;
 - vi) Calling for and participating in the development and implementation of alcohol policy along with a myriad of other stakeholders, including governments, law enforcement, educators, health professionals and others;
- and recently,
- vii) Participating in efforts in Latin America to collect data regarding, and to better understand, informal markets for alcohol beverages.¹⁵

SABMiller will continue to work to make a positive difference in the communities where it does business.

¹⁴ *Ibid*, at 25.

¹⁵ SABMiller would welcome an opportunity to discuss these recent efforts and related findings with the WHO and its members.

B. The WHO should consult with stakeholders – including economic operators – on all ways they could contribute to reducing harmful use of alcohol, throughout the development and implementation of the global strategy.

SABMiller believes the WHO should consult with economic operators on *all* ways they could contribute to reducing harmful use of alcohol, *throughout* the development and implementation of the global strategy.

In its Millennium Declaration, the UN General Assembly resolved:

To give greater opportunities to the private sector, non-governmental organizations and civil society, in general, to contribute to the realization of the Organization's goals and programmes.¹⁶

In resolution WHA61.4, WHO members requested the WHO to consult with stakeholders – including economic operators – on ways they could contribute to reducing harmful use of alcohol. In the WHO's recent consultation with economic operators, the agenda covered three of the nine action points described in the Secretariat's Report: addressing the availability of alcohol, the marketing of alcoholic beverages, and pricing policies. Participants' opening statements spoke to their broad experience relating to the other areas, such as reducing the public health impact of illegally and informally produced alcohol, harm reduction, raising awareness and political commitment, and community action to reduce harmful use. We believe these additional areas merit discussion.

We believe that inclusive, participatory processes are necessary to develop successful alcohol policies – not only for national approaches, but also for the global strategy. Multi-stakeholder debate incorporates the checks and balances of a broad range of experience and perspectives, and ensures the necessary buy-in for successful implementation.

We hope the WHO will consider hosting multi-stakeholder consultations to address each of the action points to reduce harmful use of alcohol – and that it will host another public hearing to solicit comments once the draft of the global strategy has been prepared.

SABMiller shares the goal of the WHO and its members to reduce the harmful use of alcohol, and hopes to engage in an ongoing exchange with the WHO, its members, and all relevant stakeholders, throughout the development and implementation of a successful global strategy. We remain willing to offer our perspective, expertise, and resources to work in partnership toward this end.

¹⁶ UN Resolution A/RES/55/2, 8 September 2000.

ANNEX:
SPECTRUM OF BEVERAGE ALCOHOL IN SUB-SAHARAN AFRICA¹⁷

Only commercially produced alcohol beverages sold in licensed outlets – represented in the first row of this chart – are subject to regulatory measures such as increasing taxes and restricting availability.

OUTLETS	PRODUCTS	RESPONSIBILITY	REGULATION
Licensed outlets.	Commercially produced alcohol beverages.	Good quality products. Responsible products. Responsible promotions, advertising, marketing, packaging. Trading hours adhered to.	Regulation of availability: trading hours, number of outlets. Taxes collected. Government/producer partnerships.
Licensed outlets.	Illicit but safe alcohol beverages.	Lower quality and perhaps counterfeit products. Alcohol content poorly monitored, may be higher than commercially produced alcohol beverages. Lower price than commercially produced alcohol beverages. No concern for responsible communications or promotions. A consequence of higher taxation and reduced availability.	Production and sale of products illegal. No tax collection. Some measure of law enforcement.
Unlicensed outlets with reasonable facilities and some measure of quality.	Commercially produced alcohol beverages (generally supplied by licensed retail trade).	Good quality products. Responsible products. Responsible promotions, advertising, marketing, packaging. No formal trading hours.	Illegal premises, making the sale of alcohol beverages illegal. Some measure of law enforcement.

¹⁷ Based on SABMiller's observations and experience.

SPECTRUM OF BEVERAGE ALCOHOL IN SUB-SAHARAN AFRICA

OUTLETS	PRODUCTS	RESPONSIBILITY	REGULATION
Unlicensed outlets with poor quality facilities and few amenities.	Commercially produced alcohol beverages (generally supplied by licensed retail trade). Illicit but safe alcohol beverages.	Some good quality and responsible products. Some responsible promotions, advertising, marketing, packaging (from the producer). Also lower quality and perhaps counterfeit products with higher alcohol content and lower price. Less concern for responsible promotions (from the retailer). Often a consequence of higher taxation and reduced availability. Greater instance of alcohol abuse. No formal trading hours.	Illegal premises, making the sale of alcohol beverages illegal. Greater concern about these outlets. Some measure of law enforcement, but less than the previous outlet type. Often less accessible to law enforcement agencies.
Unlicensed outlets with poor quality facilities and no amenities.	Illicit alcohol beverages, with no regard to safety of the products. Often dangerous levels of alcohol content. Often dangerous ingredients. Perhaps some commercially produced alcohol beverages often adulterated (generally supplied by licensed retail trade).	No concern for responsibility in any form: products or drinking patterns. No limit on trading hours. High levels of alcohol abuse.	Great concern about these outlets and the products they sell. Very little if any law enforcement. Often inaccessible to law enforcement.

World Spirits Alliance submission to WHO online consultation

Q1. What are your views on effective strategies to reduce alcohol-related harm?

Members of the World Spirits Alliance (WSA) are active in contributing to the development and implementation of programmes to prevent and reduce the harmful use of alcohol across the world. They have longstanding experience in partnering governments, law enforcement agencies, NGOs, business and other stakeholders in the development of strategies for tackling misuse and ensuring solutions are evidence-based.

The reasons why individuals misuse alcohol are complex, and therefore strategies to tackle harmful use must be multi-faceted. Successful strategies, as WHO has recognised, will also need to recognise and be relevant to the target group whose pattern of consumption needs to be moderated. Experience shows that apparently simple solutions around higher taxes and increased restrictions often do not meet these tests.

By involving and embracing a wide range of stakeholders, strategies that foster and generate partnerships offer considerable scope for changing attitudes and reducing the acceptability of inappropriate drinking and anti-social behaviour.

Partnerships bring together groups that may not always agree but nevertheless allow development of a broad consensus, and importantly a wide delivery mechanism that ensures that messages communicated are consistent. Being delivered by a broad range of stakeholders they can reach a wide audience.

Partnerships at national or local level also support the WHO's view that to tackle alcohol related harm it is important that solutions are culturally relevant.

The default approach for many 'western' governments and indeed a range of other organisations is to increase regulation. Calls for increased regulation are often promoted when the problem to be addressed is a lack of proper enforcement of existing legislation, especially in relation to underage sales or sales to the intoxicated. Often the claim is made that self-regulation has failed, when in fact it is the application of the law that has not been upheld.

Calls for tighter regulation are often accompanied by claims that education does not work in halting misuse. The most that can be said is that education has not been consistently delivered or evaluated over a sustained period. Indeed, the success of the social norms approach in universities in the United States and now through some embryonic work in Scotland suggests that tailored messages to targeted groups can positively influence their behaviour and results in consumption being moderated.

Much of the focus around consumption dwells on misuse. We believe the focus should be on responsible drinking, targeted towards vulnerable groups. Calls for a reduction in drinking per se, rather than adoption of a targeted approach aimed at underage, young

adults, heavy users, or drivers will not be seen as relevant by the majority of drinkers who consume moderately and responsibly. By talking up over-consumption rather than focusing on vulnerable groups, there is the danger of reinforcing the acceptability of excessive consumption.

In addition to using evidence-based targeted approaches for groups that might be vulnerable to problems with harmful use of alcohol, there should be an emphasis on reinforcing messages on what is moderate and responsible drinking. Many governments already define alcohol consumption guidelines. This type of education is integrated into early screening and brief intervention, but is important education for adults who choose to drink also.

There is a need for appropriate legislation that licences alcohol production and sale, applies proportionate taxation and protects children and other vulnerable groups. However, too great a restrictive regime leads to other social problems of illegal and illicit production and sales, smuggling, a loss of control on retail sales, and counterfeit products. All of these consequences undermine health, government revenue and the efforts of governments and industry to reduce harmful use of alcohol.

Overly restrictive regulatory regimes present a further failing. They focus on larger domestic and well known international brands, while doing little to stem legal or illicit locally produced drinks that often account for the majority of consumption. For example, just 8% of all alcoholic drinks produced in the world are traded internationally. According to the International Wine and Spirits Record (2007 data) in India just 0.9% of the spirits sold in that country are imported. In Korea it is only 1%, and just 9% of spirits sales in Thailand are imported brands. Thus any moves to increase restriction on promotion or advertising by alcoholic drinks would tend to impact on international brands which have most visibility in the market, but would have little impact on local drinks which do not advertise but account for the overwhelming majority of consumption.

Properly resourced education can be targeted to ensure most effective understanding of messages, and can be tailored to be suitable for the culture of the nation or targeted group. It must be sustainable however. Acceptability of misuse has grown up over time and changing culture requires a long-term commitment, but also offers a long-term benefit.

Q2 From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

As WHO has explicitly recognised, there is no one size fits all solution for tackling misuse of alcohol. A 'Western European' solution of highly regulated markets has not halted misuse in that region and therefore it does not, despite its many advocates, offer a solution to other regions.

Within regions there are wide cultural differences. Northern Europe offers a model of

heavy state intervention yet this has not stopped high levels of misuse, whereas there is a more moderate consumption pattern in the south notwithstanding that a generally less restrictive legislative regime prevails. The diversity of drinking culture reinforces the importance of culturally sensitive solutions at national level.

In Africa, and parts of Asia, the issue can be less about regulation, and more concerned with adopting proportionate taxation to help economically challenged countries raise revenue through applying duty at a level that does not encourage and fuel already extensive illicit production.

Illicit production due to a high tax burden not only diminishes revenue, but can have significant negative health impacts. Deaths were recorded in Turkey in 2005 as high duties encouraged production of illicit local spirits. In the two years leading up to September 2008 almost 500 people died in Russia from illicit alcohol, while in India hundreds more were reported in early 2008 to have died or suffered serious negative health impacts from consuming illicit alcohol.

From a global perspective therefore the best way to reduce harmful use of alcohol would be to promote a balanced approach to regulating alcohol production and sales, but most fundamentally to recognise that the tools available to stakeholders must be relevant to the target groups being addressed. WHO member states must retain flexibility to adopt strategies that focus on misuse within the culture of their country while avoiding unintended negative consequences.

Each country must have the capacity to make an assessment of the impact of harmful use of alcohol across its population, and the patterns of consumption. National strategies must be tailored to the specific requirements of the country and reflect the culture and context of alcohol consumption in that country.

The starting point needs to be an acceptance that people choose to drink because they enjoy alcohol for itself or because of the conviviality of the social occasion of which an alcoholic drink is just a part. If governments approach alcohol from the point of view that consumption per se is to be discouraged it is likely to lead to messages not being seen as credible by the majority of individuals who do in general drink responsibly and appropriately.

The role for WHO therefore is to establish a matrix of possible tools to tackle harmful use of alcohol by member states. Such an approach would particularly help countries select strategies according to their needs and cultures, especially for those less able to develop initiatives on their own or where other more pressing health priorities exist.

Q3 In what ways can you or your organisation contribute to reduce harmful use of alcohol?

The WSA has members in all continents. Although not a formal grouping, the ability

to exchange information and best practice and to learn and adapt from the work of others can lead to a beneficial exchange through trade associations and companies.

Alliance members can also use their resources locally to work with governments and other stakeholders to develop relevant programmes to tackle harmful use.

In Europe many WSA members are active contributors to the European Commission's Alcohol and Health Forum, in addition to being active at national level. Examples of initiatives include the European Forum for Responsible Drinking support for national drink drive campaigns and for responsible drinking website development, while the European Spirits Organisation's Charter on Responsible Drinking sets ambitious commitments for delivery of responsibility practices by the industry across the EU by 2010.

In the USA, DISCUS, the national trade association, has developed a powerful partnership approach with The Educational Tool Kit on Beverage Alcohol Consumption, created in collaboration with a broad range of medical partners. The free toolkit delivers resources for health care professionals to facilitate patient discussions on alcohol consumption and provide materials for early screening and brief intervention. The goal is to provide health care professionals with evidence-based resources that make them better able to promote the alcohol guideline and to assist them in answering questions that their patients may have on alcohol and provide them with tools to identify and reduce alcohol abuse.

Partnership lies at the heart of the Scottish Alcohol Awareness Week too. The Scotch Whisky Association and its members have taken a central role in working with Government, health stakeholders, NGOs and other industry sector producers and the retail trade to deliver two successful Weeks increasing alcohol awareness and challenging consumers to moderate their drinking.

The USA 'We Don't Serve Teens' programme is a national campaign to prevent underage drinking. Most teens who drink get alcohol from parties, older friends or from their parents. We Don't Serve Teens highlights this issue and aims to reduce teen drinking by stopping teens' easy access to alcohol. NGOs, government agencies, law enforcement and the beverage alcohol industry are involved. This on-going campaign has received national recognition and governmental awards.

Through the DISCUS Code of Responsible Practices Beverage Alcohol Advertising and Marketing has provided a means of self-regulation that has won awards and recognition by government regulators and potential critics in the USA. The Century Council, a US distilled spirits funded social aspects organisation, has delivered powerful and far reaching interventions to combat drunk driving and underage drinking.

In New Zealand and in other countries, industry has come together to adopt strong self regulation on the packaging and labelling of products, while in Australia the industry supports a social marketing campaign called DrinkWise. This aims to change drinking

culture away from excessive drinking. It has just launched its first TV campaign which is aimed at making parents aware of how children adopt their patterns of use and misuse.

Despite its loose formation, the WSA has gone further than merely being an exchange of good practice. In 2005 the WSA published its Five Basic Principles of Social Responsibility. This sets out good practice for members to uphold around the world and embraces responsible marketing, social responsibility programmes, responsible access, partnerships and evidence based policy making. The principles are complemented by culturally sensitive and appropriate codes and programmes at national or indeed regional level.

WSA can build on this work to date. For example, we believe that through the WSA we have a mechanism by which we can exchange the lessons, benefits and successes of partnership that the industry has delivered in the initiatives noted above and from other activity around the world. Our members do and will continue to work with WHO member state governments in the firm belief that reducing the harmful use of alcohol is a shared goal of benefit to all.

Nuestra posición frente al consumo irresponsable de alcohol.

Las estrategias efectivas deben

- Incorporar a todos los grupos de interés ya que una sola entidad no podrá lograr el impacto deseado. Debe haber una participación activa de entidades gubernamentales, ONG, entidades educativas, académicos, empresas privadas, públicas y disposición y trabajo por parte de los padres de familia.
- Las decisiones deben basarse en información transparente, científicamente comprobada y de acuerdo a la problemática local de cada país. Se deben realizar trabajos de investigación y comprensión de la situación de los patrones de consumo de alcohol y los daños asociados.
- Atacar la raíz de los problemas asociados al abuso de alcohol y no solo sus síntomas
- Impulsar leyes que muestren resultados claros y consistentes en cuanto a la reducción de los daños causados por el uso abusivo del alcohol. Dar apoyo para que las leyes se cumplan a cabalidad antes de proponer otras nuevas. y demostrar efectividad en sus resultados y no promover de forma indirecta la venta informal o ilegal de alcohol.

Estrategias que permiten reducir el consumo irresponsable de alcohol.

- Educar desde edades muy tempranas con programas que muestren efectividad en el retraso de la edad de inicio en el alcohol.
- Promover programas educativos dirigidos a los adultos para prevenir la venta o suministro de alcohol a menores de edad basados en información científica sobre las consecuencias a nivel fisiológico, psicológico, social y legal.
- Reforzar las leyes que hacen referencia a la NO venta de alcohol a los menores y buscar estrategias adecuadas para la problemática y cultura de cada país y en algunos casos de cada ciudad.
- Trabajando de la mano con los trabajadores de la salud como son los pediatras, médicos generales, educadores, académicos e instituciones dedicadas a la prevención. y sector privado, así como el gobierno y su ente policial.
- Dar acceso a la información sobre el consumo de alcohol y sus efectos para que las personas puedan tomar decisiones basadas en información certera, científicamente comprobada y veraz.

Formas en que Bavaria puede contribuir a reducir el uso irresponsable del alcohol:

- Siendo parte de la solución y no del problema.
- Desarrollando estrategias que contribuyan a mejorar el patrón de consumo por parte de adultos y desestimular el consumo de alcohol por parte de menores de edad.
- Trabajar en alianzas para implementar acciones efectivas para la prevención del consumo de alcohol por parte de menores y promover el consumo responsable.

Iniciativas y acciones tomadas por Bavaria para combatir el consumo de alcohol en menores de edad:

Trabajo conjunto con stakeholders como parte de la corresponsabilidad:

- Desarrollamos, con el apoyo de FENALCO (la Federación Nacional de Cámaras de Comercio), una campaña masiva, "Todos podemos ser padres" la cual concientiza a los tenderos sobre la No venta de alcohol a menores de edad
- Elaboramos una cartilla con consejos prácticos para los padres, llamada "Antes de que el alcohol hable con sus hijos, ¡primero hágalo usted!" La distribuimos en diciembre del 2.007 a 300.000 hogares, a través de los principales periódicos del país y se sigue distribuyendo a través de instituciones educativas y eventos especiales.
- Participamos en la mesa de trabajo Vida Sana liderada por RED PAPA (ONG que busca promover la participación de padres y madres colombianos en las decisiones sociales y legales que afecten a niños y jóvenes) en donde cada mes entidades públicas y privadas se reúnen para buscar soluciones conjuntas al tema del consumo de alcohol por parte de menores de edad.
- Hemos contratado a la Corporación Nuevos Rumbos para que realice una investigación en Colombia sobre los patrones de consumo de alcohol en los menores de edad. El compromiso es que nadie en Bavaria tendrá acceso a las bases de datos obtenidas para esta investigación.
- Con la ONG Colectivo Aquí y Ahora hemos desarrollando un producto pedagógico que busca apoyar el desarrollo integral de los estudiantes promoviendo actitudes positivas, reflexivas y críticas frente a la vida, asumiendo un rol activo respecto a su realidad. El programa revela el rol preventivo de la familia, promoviendo factores protectores al interior de ésta. Este programa es un plan de prevención en el uso de alcohol por parte de niños entre los 9 y los 11 años de edad.
- Desarrollo de una página web que busca apoyar a toda la comunidad interesada en trabajar en la prevención del consumo de alcohol en menores o esté interesado en obtener información al respecto : www.todospodemosserpadres.org (en este momento se encuentra en construcción).

Trabajo al interior de Bavaria, dirigido a empleados y contratistas:

- Al interior de Bavaria estamos implementando capacitaciones a nuestros empleados sobre la prevención del consumo irresponsable de alcohol y, para que conozcan la importancia que tiene no permitir el consumo de alcohol por parte de los menores de edad. así como el que puedan aprender a controlar y conocer sus propios patrones de consumo.
- Divulgación a todos los empleados sobre las políticas de alcohol las cuales incluyen la política de empleados con respecto al uso del alcohol, la política de comunicación comercial (código de auto regulación) y la política de investigación de mercados que excluye por completo a menores de edad y personas que no consumen alcohol.

Submission to the World Health Organization

November 2008

Introduction

InBev is a brewery with European origins - going back to Leuven (Belgium) in 1366 – which has grown into a global player with breweries in 30 countries on four continents. We have around 200 local beers and two global premium brands which we sell around the world.

Our company employs about 88,000 people. Needless to say that it is important to us that our business *is* and *remains* sustainable.

The sustainability of our business will depend on the reputation of our products. We can ensure that our beers are produced to the highest safety and quality standards. But it is also important to us that our consumers continue to enjoy our products in a responsible – and sustainable – manner.

Although the majority of consumers enjoy our beers in a responsible, and moderate manner, we recognize that there is a minority that misuses alcohol and we want to support effective strategies that prevent such misuse put into place.

This is why we welcome the opportunity to participate in this consultation; we feel we can contribute – along with different stakeholders – in reducing problems related to the harmful use of alcohol. Responsible consumption is not only more favorable for individuals and society as a whole; it is also in the long-term interest of our company and the reputation and commercial health of its brands.

InBev believes in promoting responsible drinking, a drinking pattern demonstrated by the vast majority of our consumers. We do not condone inappropriate drinking: we have a clear position against drink driving, against drinking under the legal drinking age, against drinking when pregnant or drinking without moderation ('binge drinking').

What are our views on effective strategies to reduce alcohol-related harm?

We welcome the fact that the WHO recognizes that there is a difference between misuse of alcohol and normal, positive drinking patterns.

In order to assess what strategies can be effective in terms of preventing alcohol-related harm, it is important first to determine what the causes of the harm are. There are usually a range of causes at the root of alcohol misuse; it is important to check the relative importance of the different causes and to focus on the most important ones.

Effective prevention strategies need to be targeted and focused on tackling alcohol abuse; as a company we are fully committed to fighting alcohol-related harm in such a focused way. We do not, however, believe in measures that are aimed at lowering the overall alcohol consumption in the hope that at least part of the misuse might also be lowered. Such lack of targeting is most likely to have the biggest impact on those who do not drink in an unhealthy or irresponsible way, without really having an impact on those with negative drinking patterns. We cannot support strategies which seek to de-normalize responsible drinking; it needs to be recognized that the majority of consumers drink responsibly and that there is a strong and consistent relationship between moderate consumption and health benefits.

In our experience, one of the main targets of alcohol misuse, is often a lack of information; or a lack of 'realization' of the damages harmful drinking can do. This is why we feel that any effective strategy needs to be multi-compound and to combine at least three important pillars: information, education and prevention.

While 'information and education' may sound naively simple, we know from experience that they can indeed make a difference. Take one example with a notoriously difficult target group: the School of Medicine of the University of Sao Paulo has developed an information and awareness program for young college students on abusive drinking. This measure has seriously changed the college environment, awakening a pro-active attitude in students, who have, amongst others, taken the initiative to ban open-bar parties.

In our view, effective strategies focused on preventing negative drinking patterns are multi-compound with a mixture of legislation and voluntary measures by several actors.

Our business is already a highly-regulated business, not only on the production side, but also on the sales side. We support the existence and implementation of laws which regulate

- the sale of alcohol in terms of licensing
- the sale of alcohol in terms of legal drinking age
- traffic safety by not allowing the combination of drinking and driving

In several of our markets, we have engaged in open support for these laws and try to raise awareness; not just encouraging people to 'live by the law' but to educate them about what exactly is the law and why it is important.

For instance, in Belgium:

- the BoB campaign which is co-sponsored by the brewing industry reminds people of the dangers of combining drinking with driving
- the 'Respect 16' campaign reminds bartenders that Belgian law stipulates you cannot serve people below 16 any beer. We also explain to them why the law is there; and how – in effect – saying 'no' to somebody who is too young to drink,

means respecting that person's health. Respecting the law means respecting the people who the law aims to protect.

While we as producers can support the laws and raise awareness around them to some extent; this is not enough.

We are therefore glad that there are other groups who help towards the same goal, for instance in Belgium, we admire the campaign of the Flemish Alcohol and Drugs Agency (VAD) which make people below legal drinking age aware of the dangers of drinking inappropriately.

Without measures that ensure proper enforcement of the law (with consequences when it is broken) the effect of awareness raising campaigns will be limited and will definitely not impact 'problem drinkers'. Proper enforcement of existing laws is a very big part of the key to tackling problems such as drink driving; underage drinking and the sale of alcohol to people who are already over a safe limit. It is the government's responsibility to ensure that there is proper enforcement of the rules that are in place. In some countries in the developing world, industry may be able to help with this (e.g. in Brazil and Argentina, we have supplied local police forces with free breathalyzers) but this is the first and foremost the responsibility of the government; not the industry.

We stress again that effective strategies to prevent alcohol-related misuse, will also take into account underlying causes. For instance; if there is a 'trend' of people drinking more than they used to, the reasons for this should be researched; the different drivers of negative drinking patterns should be examined and those that determine the drinking behaviors the most, should be prioritized. As an example: some surveys show that underage drinkers say that they drink mainly because they are bored. This is not something that can be easily fixed, and definitely not something industry can be blamed for. It is dangerous to opt for 'quick-fix' solutions that forget to tackle underlying causes.

One of our programs in Argentina has a very long-term approach and aims to really tackle one of the underlying causes of risk behavior in young people: the 'Vivamos Responsablemente' program works with trained psychologists who through talks in schools and talks with parents aim to give young people more self-confidence; as that is also one of the causes why we believe there is youth drinking. This program aims to bring a real social behavior change about, but we know that we need to be patient for results, such social norming does not happen overnight.

From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

The use of the term 'global' is relative in this industry: InBev is a global player but 80% of our brands sold worldwide are local brands.

In some of our markets, we have had responsible drinking initiatives for over 30 years. In 2008, we decided that we needed to have at least one responsible drinking initiative in place in each of the 30 countries we have breweries in. This was decided at global headquarters and while we tried to look for a 'global program', we soon realized that the best way to tackle this, was by trying to stay close to the local reality of the market. Of course we tried to encourage 'best practice sharing' across the 'InBev world', in reality we ended up with 30 different programs, differently thought out and differently executed.

Hence we have serious reservations about a uniform approach for the alcohol-related problems around the world; we do not believe this will work.

In what ways can our organization contribute to reduce harmful use of alcohol?

In terms of reducing harmful use of alcohol; we do two kinds of initiatives:

- general awareness raising about the importance of responsible drinking; and
- awareness raising and sometimes interventions re the dangers of irresponsible drinking

Where possible, we try to do this in partnership with other organizations, be they governmental (e.g. city councils) or non-governmental (e.g. road safety associations, police forces, retail organizations).

Below are just a few examples of different initiatives we have running around the world. We would like to stress that the responsibility of trying to reduce harmful use of alcohol is *everybody's*: families, schools, government, police, retailers etc... as well as the individuals themselves. We do not shy away from our responsibility but we can only do so much, this needs to be a partnership, multi-faceted approach targeted at misuse in order to be successful.

- In Argentina, the 'Vivamos Responsablemente' program has so far reached 15,500 young people in eight cities. Devised in conjunction with leading pedagogues who execute the program, it addresses common adolescent challenges and aims to give them more self-confidence and more self-respect, hence directly tackling some of the underlying causes of alcohol abuse among young people.
- In Belgium, the 'Respect 16' program is aimed at bartenders; educating them about the legal drinking age law, but also making them understand the importance of respecting the health of young people by refusing to serve them. The campaign will be further developed to reach other 'providers' of alcohol for young people, such as parents and shop assistants.

- In Germany we have a designated driver campaign that is specifically focussed on young drivers, who will not have a lot of driving experience and where it is really essential that they do not drink at all. We have partnered with 25 major discotheques to make the initiative a success.
- In Canada, we have together with the Brewers Association of Canada co-funded the Screening, Brief Intervention and Referral initiative with the College of Family Physicians of Canada and the Canadian Centre on Substance Abuse. This program will assist health professionals in advice and referral, based on their professional assessment, to patients at risk or who may have already alcohol-related problems, including advice concerning fetal alcohol spectrum disorder.
- In China, the first ever 'don't drink when you drive' campaign was launched by InBev in collaboration with Shanghai police in November 2008. The program focuses on the responsibility feeling of adults, along the same line as a successful program in Canada, where we used photographs of employees' children in the material encouraging adults to behave responsibly.
- In Russia, our TV campaign that encourages people to stop and think about the damages their drinking may be doing to their family life coincided with Russia's 'year of the family'.
- As a founding member of the UK Portman Group, we have pledged significant support to The Drinkaware Trust which has been established with the objective of positively changing public behavior to help reduce alcohol misuse and minimise alcohol-related harm.

With these campaigns, we try to contribute to a healthy consumption of our consumers every day.

To back up these initiatives, our Commercial Communications Code also ensures that our advertising does not condone nor encourage irresponsible drinking.



Consulta OMS

Octubre 2008

Cuestión 1.- Opiniones sobre estrategias eficaces para reducir los daños relacionados con el alcohol.

1.- Normalmente, los daños relacionados con el alcohol son consecuencia ya sea del abuso en su consumo o, inclusive, del simple consumo de alcohol producido ilegalmente y fuera de normas sanitarias, el cual representa en el mundo una proporción significativa del consumo de alcohol puro. En este sentido, para contar con estrategias eficaces que reduzcan los daños relacionados con el abuso en el consumo del alcohol, creemos que es necesario entender los diferentes patrones de consumo de las bebidas con diferente graduación alcohólica.

2.- El alcohol ilegal es beneficiario directo de la excesiva regulación de los últimos años. Con frecuencia, la regulación es tal que supera la capacidad de la propia autoridad para aplicar la ley. Ello genera una oferta de bebidas sin controles sanitarios y con precios bajos al evitarse el pago de impuestos y los costos de cumplimiento de la normatividad. Por ello, el alcohol ilegal representa un volumen muy relevante del alcohol que se consume en el mundo, lo que hace necesario profundizar en los estudios que permitan contar con una medición más certera del alcohol adulterado y no registrado que se consume en cada región.

3.- Una estrategia efectiva para reducir los daños causados por el alcohol ilegal requiere de acciones coordinadas entre la industria, el comercio y la autoridad para adecuar la regulación a la realidad de cada región y a las capacidades de la autoridad para aplicarla. De manera particular, se tienen que reconocer las diferencias regionales, culturales y sociales en el consumo para así desarrollar políticas públicas y estrategias que permitan reducir efectivamente dichos daños.

4.- Una estrategia enfocada a disminuir el daño de patrones de consumo nocivos parte de reconocer que se ha de buscar un cambio de conducta, ya sea de conductas recurrentes en el tiempo o de conductas esporádicas que generan o tienen el potencial de ocasionar daño tanto a quienes consumen como a terceros.

5.- Para desarrollar estrategias eficaces para lograr dichos cambios de conducta implica contar necesariamente con información sólida respecto a los diferentes patrones de



consumo, a los productos involucrados, a las ocasiones de consumo, a la intencionalidad y las costumbres, así como a los valores regionales y otros aspectos del entorno socio económico involucrado. Dichas estrategias deben tener objetivos claros y evaluables, tanto como un procedimiento para capturar aprendizajes y reenfocar esfuerzos.

6.- En forma complementaria y con base en información estadística confiable, dichas estrategias deben poder contemplar acciones puntuales en los lugares, momentos y segmentos en que la incidencia de daños sea más frecuente (accidentes, violencia, enfermedades, etc.). Sería muy importante poder estandarizar tanto la metodología básica como un núcleo relevante de investigaciones científicas relacionadas con el alcohol, para así tener datos serios que sustenten las medidas necesarias o, en base a ellos, tomar nuevos lineamientos para reducir los daños relacionados con el alcohol.

7.- Estos esfuerzos han de estar integrados a la promoción de una actitud generalizada de respeto por la ley, de búsqueda del bienestar como un objetivo ampliamente deseable, de considerar a la prevención como enfoque toral de las acciones y de promover la responsabilidad como valor orientador de las decisiones del consumidor.

8.- Lograr un cambio de conducta de las personas requiere que éstas puedan contar con información realista y creíble acerca de las consecuencias de sus actos, así como incentivos adecuados (positivos y negativos) para orientar su conducta de mejor manera.

9.- Hay que reconocer, sin embargo, que el consumo responsable y moderado de alcohol puede formar parte de un estilo de vida sano y contribuye con la salud del adulto en general. Por ello mismo, es necesario avanzar en una definición adecuada de lo que significa “abuso en el consumo”, ya que la falta de dicha definición ha generado con frecuencia el que no parezca haber frontera entre el consumo y el consumo abusivo.

10.- Frenar y disminuir los daños relacionados con el consumo nocivo de alcohol requiere pues de un proyecto comunitario de colaboración y no de confrontación; que tenga a su vez visión de largo plazo, que sea eficaz y no oportunista, que sea incluyente y promotor de la participación de todos los involucrados, y que tenga en mente la mejora del comportamiento de la población a largo plazo.

11.- Una estrategia eficaz para reducir los daños asociados con el abuso o el consumo nocivo de alcohol requiere bases científicas sólidas, así como contar con objetivos y metas de largo plazo que sean tanto secuenciadas como medibles. Sin consistencia en la instrumentación de dichas estrategias, sin una evaluación objetiva y un aprendizaje práctico y aplicado, no puede haber estrategias eficaces en lo que son sin duda objetivos



compartidos por todos.

12.- La OMS debe poder ser un facilitador de este proceso de colaboración. Para ello, necesita proporcionar herramientas para el diseño de investigaciones así como difundir métodos para la adecuada evaluación de las intervenciones públicas, generando elementos objetivos de comparación y aprendizaje entre regiones y países. Con relación a este último punto, por ejemplo, no puede hacerse a un lado la conveniencia de establecer y aplicar pruebas estandarizadas de límite de alcohol en la sangre entre conductores, así como reconocer la carga genética de cada población a contraer enfermedades debido a patrones de consumo de alcohol.

Cuestión 2: Opinión sobre el mejor modo de reducir los problemas relacionados con el uso nocivo del alcohol desde una perspectiva mundial.

1.- Como ya se ha abordado, y sin dejar de lado el problema del abuso en el consumo de alcohol, tal vez el tema más relevante es el poder desarrollar acciones diversas, integrales y coordinadas para eliminar el alcohol ilegal en las sociedades. No sólo por las muy preocupantes implicaciones sanitarias, sino también por lo que dicho producto significa en términos de la erosión en la base fiscal del estado, combatir el alcohol ilegal debe ser una de las prioridades de cualquier país que desee regirse por el imperio de la ley.

2.- Un segundo aspecto toral es la promoción de códigos de autorregulación modernos, amplios y transparentes que, al tiempo que sean plenamente congruentes con el marco legal, se apliquen de manera congruente entre sus miembros, incluyendo la necesaria evaluación en el tiempo.

3.- Sin duda, una tercera manera de reducir el consumo nocivo de alcohol requiere fomentar la investigación sobre patrones de consumo, sus causas, su arraigo, sus motivaciones, su frecuencia, etc, a efecto de que las políticas públicas a implementar se traduzcan en estrategias eficaces. Sin estadística confiable y oportuna, no sería posible evaluar los resultados de las políticas públicas, así como tampoco sus efectos no deseados y no habría por tanto un marco de comparación adecuado para la mejora de dichas políticas en el tiempo.

4.- Pero aún con los mejores estudios, sin la colaboración decidida entre los diferentes actores de la sociedad no sería posible combatir eficazmente los problemas asociados con el abuso o el consumo nocivo de alcohol. Se requiere establecer vínculos y asociaciones



con todos los actores relevantes de la sociedad para educar y prevenir el uso nocivo, teniendo como fin último el cambio de patrones inadecuados hacia una promoción de estilos de vida saludables, que lo mismo puedan suceder mediante la moderación del consumo como mediante el pleno respeto al abstencionismo de quienes así consideren más adecuado su estilo de vida.

5.- En particular, la colaboración entre los actores involucrados es indispensable en temas tan relevantes como el consumo de alcohol por parte de menores de edad y la relación del consumo con los accidentes vehiculares, temas en los cuales las sociedades modernas han puesto un gran interés tanto para entender mejor como para combatir y eliminar.

Cuestión 3. Modos en que pueden contribuir ustedes a reducir el uso nocivo del alcohol.

1.- De tiempo atrás, los Cerveceros Mexicanos hemos manifestado nuestro pleno compromiso con la prevención y el combate a las pautas de consumo nocivo. Hemos actuado en la medida de nuestras posibilidades junto con las autoridades de Salud y de Educación de nuestro país. Las principales acciones que hemos implementado han consistido, básicamente, en desarrollar esfuerzos para promover la educación, la capacitación y la orientación a la población para alentar la cultura de la responsabilidad frente al alcohol, fortaleciendo así la observancia de la ley.

2.- Los Cerveceros Mexicanos queremos generar y fortalecer el compromiso personal y social que tenemos como industria y que debemos fomentar como ciudadanos. Creemos que a través de la búsqueda de los siguientes ocho objetivos podemos contribuir a reducir el uso nocivo del alcohol:

1. Proteger la salud de toda la población pero sobre todo de los menores de edad y de las mujeres embarazadas.
2. Evitar que se venda o suministre alcohol a los menores de edad.
3. Dejar claro que sólo los adultos sanos pueden consumir alcohol y ello de manera moderada y responsable. .
4. Respetar la decisión de quienes consideran que lo mejor para su salud es ser abstemios.
5. Proporcionar a los padres de familia información objetiva sobre el uso y los riesgos del abuso del alcohol.
6. Alentar la comunicación familiar asertiva en el tema de las bebidas alcohólicas, en particular con los menores de edad.



CÁMARA NACIONAL DE LA INDUSTRIA DE LA CERVEZA Y DE LA MALTA

7. Promover la cooperación entre la sociedad, la iniciativa privada y el gobierno en favor de la responsabilidad frente al alcohol.
8. Fomentar los valores de responsabilidad a los padres de familia, a los jóvenes, a los menores de edad, a los dueños y al personal de bares – restaurantes y centros nocturnos mediante pláticas, capacitación e información para llegar al cuidado de la salud propia y la de los demás.

MillerCoors Consultation on Alcohol Related Harm

MillerCoors was created in 2008 through a merger of USA assets held by SABMiller and Molson Coors Brewing Company. MillerCoors brews approximately 82,000,000 hectoliters of beer and markets products only within the USA and Puerto Rico. It is our passion to provide great products for responsible beer drinkers. We help make the communities within the United States unique and enjoyable places to live by respecting and promoting responsible consumption of our products within the traditions, cultures, and social mores of each State within our representative democracy.

When it comes to alcohol responsibility MillerCoors has a single goal: Responsible enjoyment and use of our products by consumers. We realize that for some consumers one drink can be too many, and that responsibility for people under the legal drinking age means not drinking, period. Over the years our parent companies devoted significant resources to make positive contributions to responsibility programs and services. At MillerCoors we continue to carry out our role as a significant part of providing effective solutions to deal with the many challenges arising from access of alcohol to underage, irresponsible over consumption and driving drunk. We do this through getting involved and working with industry stakeholders, concerned organizations in our communities where we do business, and leaders in education and government representing important perspectives and valued experiences. Together we have developed strategies that result in voluntary compliance with government regulation, meaningful self-regulation and effective programs that contribute to reducing abuse of our products and other alcohol beverages.

MillerCoors competes in a country that requires brewers to call attention to information about our alcohol beverages and consumption of these beverages by consumers. Clear labeling of the alcohol content is required¹ to present consumers with information about the type of alcohol beverage they consume. During the past seven decades, our federal government approved and

¹ See TTB mandatory labeling information brochure on internet @ www.ttb.gov/pdf/brouchures/p51903.pdf

updated laws² and regulations³ that prohibit use of misleading information and graphics, require clear warnings, and provide consistent information about the alcohol content when it is displayed on labels. Also, we are required to include additional balanced information about the possibility of adverse effects of consumption of our products if labeling or advertising, includes any type of claim or information about health. Most disclosure requirements and prohibited practices also apply to advertising.

At MillerCoors, we firmly believe there is a role for the alcohol industry to play in reducing the irresponsible consumption of alcohol beverages, which increases various well known risks of harm to the consumer and to others. We frequently work in partnership with others to take action in our role as a responsible brewer. Our partnerships focus on working together on youth access prevention, issues arising from irresponsible over-consumption and driving drunk. Furthermore, we are committed to meaningful self-regulatory practices in selling and marketing our products, and we advocate for effective public policy in legislative and regulatory bodies of our federal government and in each of the various states.

Examples of MillerCoors' commitment to effective solutions:

- o Working Together: Preventing Youth Access to Alcohol

Research shows parents have the most influence on teens' drinking decisions. To help parents of teens prevent underage drinking, we formed a strategic partnership with the expert researchers at Search Institute, developers of the widely used Developmental Asset[®] approach to raising children who thrive and are successful. Research by Search

² See *Alcohol Beverage Labeling Act of 1988*. Since 1989 brewers have included a 42-word health warning on every container of malt beverage and flavored malt beverage sold in the US. (USC 27, Sec 215(a)). The Act requires that the warning statement be "located in a conspicuous and prominent place on the container of such beverage," and that the statement "shall appear on a contrasting background."

³ (a) The Bureau of Alcohol, Tobacco and Firearms adopted regulations to develop the requirements for the display of the government mandated warning statement, including that the statement be "readily legible under ordinary conditions", "on a contrasting background", and "separate and apart from all other information." See 27 CFR 816.

(b) The Alcohol and Tobacco Tax and Trade Bureau, US Department of Treasury provides for stating the alcohol content of malt beverages on labels and in advertising, and prohibits any "statement, design, device, or representation that tends to create a false or misleading impression that the malt beverage contains distilled spirits or is a distilled spirits product." See 27 CFR 87.29(a) (7).

(c) The Alcohol and Tobacco Tax and Trade Bureau, US Department of Treasury provides for stating the alcohol content of malt beverages on labels and in advertising, and prohibits any "health-related statement that is untrue in any particular or tends to create a misleading impression as to the effects on health of alcohol consumption. TTB will evaluate such statements on a case-by-case basis and may require as part of the health-related statement a disclaimer or some other qualifying statement to dispel any misleading impression conveyed by the health-related statement." See 27 CFR 87.29(e).

Institute confirmed teens that have 30 or more Developmental Assets are 15 times less likely to abuse alcohol. It was this solid research that inspired web-based MVParents.com that is utilized by parents, and other significant adults in children's lives, across our country.

With the assistance of experts in the fields of education, family therapy, law enforcement and student health and wellness, we developed a guidebook called "Let's Keep Talking." The book guides parents on asking the right questions; preparing teens for college and life after high school; knowing the laws governing underage drinking and the consequences associated with poor decisions.

MillerCoors has also partnered with the researchers at the Heller School of Public Policy and Management at Brandeis University, operators of the Responsible Retailing Forum, on youth access to alcohol prevention efforts. The Respect 21 Responsible Retailing Program was developed, featuring a suite of unique tools -- including training, resources, mystery shopper inspections and point of sale materials -- to help prevent alcohol beverage sales to underage people. What sets Respect 21 apart from other retailer programs is the involvement of the distributor tier in the alcohol industry, and its research-based measurement. At every stage that we have rolled out the program, measurable researched results have proven to be effective in preventing the sale of alcohol beverages to underage individuals. We also work with communities on an individual basis - not a cookie cutter type approach - to meet their unique needs and strategies. As a result, we have seen measurable behavior change and harm reduction with retailers. In Miami, for instance, mystery shopper results showed a 100 percent increase in the number of times clerks requested IDs at participating retail businesses.

MillerCoors also partners with law enforcement to produce an annual Drivers License Guide, part of our continuing effort to help retail sales clerks and servers detect fake IDs. The guide gives examples of valid license formats for all 50 U.S. states and the Canadian provinces and is endorsed by the Fraternal Order of Police. We make these guides available at no cost to law enforcement agencies and retailers. To date, more than 1.6 million copies have been distributed.

- Working Together: Reducing Drunk Driving

MillerCoors supports many national, state and local drunk-driving prevention programs that provide taxi service and other transportation alternatives, promote designated driving, safe boating, address drinking at sports events, train alcohol beverage servers and sellers, and aggressively attack drunk driving in other ways. Our most recent program “You Hold the Key...Never Drive Drunk” is a campaign advocating use of cabs, designated drivers and transportation alternatives by consumers.

MillerCoors also partners with the American Motorcyclists Association and created a national motorcycle safety program, Keep Your Balance. This program offers motorcyclists rewards for pledging to ride responsibly and provides motorcycle safe-driving tips. The program also encourages safe alcohol consumption and offers resources such as prepaid phone cards and rider-training kits to promote safe rides.

- Working Together: Preventing Irresponsible Consumption

MillerCoors supports adults who make responsible choices and maintain the boundary between enjoyment and over consumption. We resource and contribute to targeted programs that keep customers safe if they ever need extra help, including:

- The W.I.N. Foundation Raise Your Standards program that helps thousands of college-age women make positive, healthy choices about drinking and dating relationships, and
- TEAM (Techniques for Effective Alcohol Management) Coalition, an alliance of professional sports organizations, entertainment facilities, concessionaires, broadcasters, governmental traffic safety experts and brewers, to promote responsible drinking and positive fan behavior at sporting facilities. TEAM Coalition trains thousands of stadium workers each year on how to handle alcohol-related incidents, and on the importance of educating fans about drinking responsibly and designating a sober driver.

MillerCoors believes that servers have an important role when it comes to promoting the responsible enjoyment of our beers. That’s why we are a founding sponsor of the

TIPS (Training for Intervention Procedures) Program. Developed by Health Communications Inc., TIPS is designed to help servers encourage responsible drinking. It seeks to give servers the confidence, decision-making skills, and information they need to prevent underage drinking, drunk driving and over consumption. Certified server training programs have proved to be an effective tool in responsible serving and selling of alcohol.

o MEANINGFUL SELF-REGULATION

MillerCoors is a leader in self-regulation and adheres to advertising content standards that are much more extensive than laws or government agency actions in the United States can restrict or require.

MillerCoors is a member of the Beer Institute and we develop advertising content⁴ and place advertising⁵ in compliance with standards and guidelines set by the Beer Institute. MillerCoors also adheres to review of beer advertising by an independent third party known as the Code Compliance Review Board (“CCRB”).⁶

We work with our industry on voluntary standards, ad placement guidelines and oversight by independent third parties. These self-regulatory programs provide government agencies, elected officials, consumers, and citizens’ immediate and direct interaction with MillerCoors whenever there arises any disagreement about what we say, how we say it, and where we place advertisements about our products. Additionally, our self-regulatory programs provide faster processes than most government agency or judicial processes, and are much less expensive to taxpayers and our government.

MillerCoors puts all advertising and marketing through a rigorous internal review process that includes the scrutiny of our “Sales and Marketing Compliance Committee”. This committee is a cross-functional group of trained employees who meet two times every week to review advertising and marketing materials to ensuring they conform to all codes and alcohol beverage laws.

o ADVOCATING FOR EFFECTIVE PUBLIC POLICY

In capitals and communities across America as well as in the nation’s capitol, our approach is simple: We support measures to ensure that alcohol isn’t sold to, possessed by or consumed by underage people and we support efforts to aggressively reduce

⁴ See www.beerinstitute.org/BeerInstitute/files/ccLibraryFiles/Filename/00000000384/2006ADCODE.pdf

⁵ See www.beerinstitute.org/BeerInstitute/files/ccLibraryFiles/Filename/00000000692/ADCODEBUYINGGUIDELINES2007.pdf

drunk driving.

MillerCoors played a leadership role in passage of the Sober Truth on Preventing Underage Drinking Act (STOP Act). This groundbreaking bipartisan legislation addresses the issue of underage drinking and provides a long-term policy framework and funding for programs and initiatives aimed at preventing it. MillerCoors continues to support funding for this important initiative.

MillerCoors advocates for tougher legislation intended to reduce drunk driving incidents. An example of this is legacy Miller actively supporting legislation in Wisconsin that lowered the "prohibited alcohol concentration" to 0.02 for fourth and subsequent offense drunk driving cases. Miller was so active in supporting passage of this measure that Wisconsin's Governor held the signing ceremony at the Miller headquarters.

We historically support legislation that prohibits and/or penalizes:

- Serving, giving or selling alcohol beverages to underage persons
- Manufacturing, possession or use of false identification to obtain alcohol beverages
- Underage purchasing, attempting to purchase, possessing, or consumption of alcohol beverages
- Graduated licensing systems where younger drivers obtain more privileges after gaining experience and maintaining good driving records
- "Zero tolerance" policies for underage drivers who test positive for alcohol consumption
- Driving under the influence of alcohol, and stiffer penalties for repeat offenders
- Internet, mail-order and telephone sales of alcohol beverages

Under the "Tough Laws, Safe Roads" banner, we have participated in or led coalitions that helped see such laws passed in several states, including Wisconsin, Georgia, Illinois and Florida.

⁶ See <http://www.beerinstitute.org/tier.asp?bid=258>



Beer Institute Submission to Public Hearing on Ways of Reducing Harmful Use of Alcohol

Beer Institute (BI) is the trade association for the United States of America (U.S.) brewing industry, representing large and small brewers, importers, and industry suppliers. Our members are committed to preventing and reducing alcohol abuse, including illegal underage drinking and drunk driving, because responsible consumption of alcohol is a priority for us.

Most adults who drink do so moderately, and with a growing body of credible research suggesting that some health benefits are associated with moderate consumption of alcohol beverages, it is appropriate to focus not on overall consumption, but instead on the drinking contexts, patterns, and behaviors that may result in harm. As defined by the World Health Organization's charter, health carries a broad definition and requires recognition of all benefits. We therefore commend this consultation's focus on the reduction of harm which results from illegal, irresponsible or excessive consumption of alcohol beverages. We support a number of harm-reduction approaches. We also sponsor and help implement various regulatory and educational approaches reinforced by industry self-regulation and voluntary compliance to minimize the risk of harm.

We support government alcohol licensing and regulatory regimes as they help to ensure that appropriate taxes are collected on alcohol beverages, reduce the risk of illegal underage sales, and maintain transparency, accountability, and quality of product. BI members have a long history of supporting and strengthening effective state-based alcohol regulation to provide an appropriate regulatory environment for the distribution and sale of alcohol beverages. That includes state licensing systems, ongoing scrutiny by regulatory agencies, and enforcement where appropriate.

Available data, however, do not support a global control-of-consumption agenda. Broad, population-based programs aimed at discouraging all people from responsible drinking of alcohol beverages are not effective interventions to reduce health problems associated with alcohol abuse. First, scientific literature indicates that discouraging moderate drinking does not promote health in broad segments of the population.¹ Second, population-based programs may lead to unintended negative consequences. For

¹ Gunzerath, L. et al. National Institute on Alcohol Abuse and Alcoholism Report on Moderate Drinking. *Alcoholism: Clinical and Experimental Research*, 2004. 28(6). See also Klatsky, Arthur. Alcohol and Health: How Much is Good for You? *Scientific American*, February 2003.

example, severely taxing or restricting commercial alcohol may encourage consumption of unregulated noncommercial alcohol, which presents potential health risks and increased law enforcement concerns.² Particularly in the developing world, consumers may easily switch to widely available, unregulated, non-commercial alcohol. This can be especially concerning for those countries that lack sufficient law enforcement infrastructure. Third, there is little evidence that population-based restrictions are effective in reducing alcohol abuse and the negative health effects associated with it.

On taxation specifically, not only could high taxes result in the outcomes above, but they are also extremely ineffective in changing behavior for most people. Proponents of large tax increases often cite behavior change, such as reduced consumption of alcohol beverages, as a goal of the increases. Studies have shown that instead, demand for alcohol beverages decreases very little and that generally the people who do reduce or cease their alcohol beverage consumption are those who drank moderately. Studies suggest that moderate drinkers may be sensitive to price while the heaviest drinkers are not.³ Those who drink irresponsibly continue to do so but may switch to lower-cost brands.⁴ Even the U.S. Supreme Court weighed in on this, noting “... the evidence suggests that the abusive drinker will probably not be deterred by a marginal price increase, and that the true alcoholic may simply reduce his purchases of other necessities” (*44 Liquormart, Inc. v. Rhode Island*, 116 S. Ct. 1495 (1996)). A tax increase therefore could reduce well-being for moderate drinkers while not reducing the consumption of those individuals who were targeted by the increase.

Alcohol consumption patterns and health effects differ by culture, within each country, and certainly among different countries. Indeed, differences among alcohol beverages exist as well. Alcohol beverages differ widely in ethanol concentration. Highly concentrated beverages may result in higher blood alcohol concentrations for consumers in a shorter period of time than with low-concentration beverages. Because the patterns and products are not the same everywhere, neither can be the solutions to irresponsible consumption. We support culturally specific programs created in consultation with all stakeholders for targeted populations that are identified by credible research. Examples of such targeted populations are repeat drunk driving offenders, underage drinkers, and pregnant women. We also support education on the importance of measuring the amount of alcohol beverages that one consumes. No “one-size-fits-all” policy solution exists.

Effective public health policies must be based on reliable data, currently lacking for most of the world. In the U.S., we rely on a wide body of government-sponsored surveys to track alcohol consumption prevalence and abuse statistics among all age groups. Among other things, these data tell us that a substantial majority of underage persons do

² Gruenewald, Paul G., and Treno A. J. (2000). Local and global alcohol supply: Economic and geographic models of community systems. *Addiction*, 95(Supl. 4):S537-S549.

³ Manning, Willard G., et al. (1995). The demand for alcohol: The differential response to price. 1995. *Journal of Health Economics*, 14:123-148.

⁴ Gruenewald, Paul G., et al. (2006). Alcohol Prices, Beverage Quality, and the Demand for Alcohol: Quality Substitutions and Price Elasticities. 2006. *Alcoholism: Clinical and Experimental Research*, 30(1):96-105.

not drink and the number of underage persons who do drink illegally is in decline. Specifically, 72% of 12-20 year olds in the U.S. don't drink, and the percentage of high school seniors in the U.S. who had their first alcohol drink before age 13 has declined 27% between 1991 and 2007.^{5,6} Long-time tracking of drunk-driving fatalities shows that these are also in decline, including teenage drunk-driving fatalities. Total fatalities in drunk-driving crashes in the U.S. have declined 38% between 1982 and 2007.⁷ Total fatalities in teen drunk-driving crashes in the U.S. were 67% lower in 2007 than that were in 1982 and 19% lower in 2007 than in 2000.⁸ Additionally, industry members provide basic sales data on which the U.S. government and even alcohol industry critics rely.

In order to achieve successful interventions, it is important to engage all stakeholders on this issue. In the U.S. example, these stakeholders include national, state, and local governments, parents, educators, student leaders, law enforcement officials, highway safety experts, the alcohol beverage industry, advocacy groups, researchers, and others. While the notion of coalescing all stakeholders applies to every country, each specific country's regulatory structure and culture will determine who those stakeholders are. Achieving consensus among these interested parties on culturally or population-specific interventions and their implementation will serve to reduce the risk that irresponsible or illegal consumption of alcohol will occur and the effects of excessive consumption of alcohol in areas where effective interventions are in place.

Some specific examples of interventions that, if tailored to meet local needs, can be, and in the U.S., have been – successful are:

- Early education by parents, teachers, and other respected adults regarding responsible decision making that is reinforced as a child grows;
- Empowering parents to have discussions with their children regarding alcohol consumption and reminding parents of their responsibility to prevent underage access to alcohol in the home;
- Programs, such as screening and brief interventions, that encourage physicians and other health care providers to identify patients needing targeted interventions;
- Strict enforcement of current laws related to alcohol and support of law enforcement officers and agencies;
- Medical and mental health treatment for those in need;
- Laws to reduce drunk driving, such as graduated penalties for repeat and high-BAC offenders and zero tolerance laws for underage persons driving with any alcohol in their system;
- Designated-driver and safe-ride efforts; and
- Responsible beverage service training for sellers and servers of alcohol beverages.

While the U.S. beer industry supports these types of interventions, BI and its members

⁵ Substance Abuse and Mental Health Services Administration, Office of Applied Studies (2008). *Results from the 2007 National Survey on Drug Use and Health*. (NSDUH Series H-34, DHHS Publication No. SMA 08-4343). Rockville, MD.

⁶ Youth Risk Behavior Surveillance. (2008). Centers for Disease Control and Prevention, Department of Health and Human Services.

⁷ National Highway Traffic Safety Administration, U.S. Department of Transportation. (2008).

⁸ National Highway Traffic Safety Administration, U.S. Department of Transportation. (2008).

also recognize that more substantive and unbiased research is needed in this area to better identify effective interventions and strategies to reduce the irresponsible consumption of alcohol.

For decades, members of the U.S. beer industry have been legitimate and contributing stakeholders in alcohol policy discussions and implementation through active engagement with federal and state government agencies and other interested parties. Also over that time, BI members have invested substantial resources in the U.S. and abroad to create and support initiatives that address alcohol abuse. And they continue to strengthen their longstanding efforts to help ensure their products are consumed responsibly. They engage in successful partnerships with law enforcement, public safety organizations, educators, community organizations, parents, and others to combat the serious issues of alcohol abuse, including underage drinking and drunk driving.

BI and its members are committed to the voluntary self-regulation of their advertising and marketing practices. Our experience has shown that voluntary self-regulation coupled with government oversight can achieve alcohol policy goals while preserving government resources. Strong self-regulation in advertising and other business practices can also be more prompt with enforcement than government regulation can be. Self-regulation of alcohol advertising was recently affirmed by the U.S. Federal Trade Commission as effective in reducing the likelihood that alcohol marketing will target underage youth.⁹ The self-regulatory system that is currently in place for our members provides guidelines for content and placement as well as regular audits of placement to ensure compliance with the requirement that advertisements be placed only in media where at least 70 percent of the audience is reasonably expected to be at or above the legal drinking age. The guidelines, embodied in the Beer Institute Advertising and Marketing Code, also include a provision that offers independent review of advertising complaints for consumers who are dissatisfied with a brewer's response to a complaint that specific advertising is inconsistent with a guideline in the Code.

Within the U.S., our members are leaders in providing information to encourage responsible alcohol consumption among legal drinking age adults, supporting varied programs at professional sporting events, producing party planning guides that include best practices for safe celebrating, supporting retailer training in several languages to reduce sales to underage and intoxicated persons, sponsoring free safe rides home, and creating materials to help parents talk with their children about the dangers and consequences of underage drinking. The U.S. beer industry also supports media campaigns and public service announcements to raise awareness of alcohol-related issues and the resources available to address them.

Although the impact of media campaigns is sometimes questioned, experience demonstrates that when the right audience is targeted with the right message, such campaigns can be quite effective in raising awareness of important facts and changing

⁹ Federal Trade Commission. (2008). *Self-regulation in the alcohol industry: Report of the Federal Trade Commission*. Washington, DC. The report is available at: <http://www.ftc.gov/os/2008/06/080626alcoholreport.pdf>.

cultural attitudes. For example, the U.S. experience with the “designated driver” campaign has resulted in a large percentage of drivers knowing about and participating in the program. Similarly, U.S. brewers, importers, distillers, and vintners, along with the U.S. government, sponsored a media campaign reminding of-age adults – who are the primary source of alcohol for illegal underage drinkers in the U.S. – not to give alcohol to teens and the legal consequences of doing so. The U.S. government reported that this campaign generated unprecedented reach and was widely supported by government officials nationwide.

Regarding youth access to alcohol beverages specifically, among other efforts, brewers and importers have supported tough state laws for the manufacture or use of fake identifications, instructed retailers on how to spot false identification, and provided retail signage and national advertising reminding parents and other adults not to purchase alcohol for minors or provide it to them at parties.

One strategy that has recently been receiving more attention and study is screening and brief interventions. The literature on this targeted, individual strategy shows successful results to date.¹⁰ Brewers and beer importers can help increase awareness of this effective intervention by including information about it in their educational materials.

BI and its members strongly believe that these historic and ongoing efforts contribute to the reduction of the illegal, irresponsible or excessive consumption of alcohol beverages and the risks associated with that behavior. We will continue devoting time and resources to efforts like those described above to stop alcohol abuse and keep communities safe. It is alcohol abuse – not the legal, responsible consumption of alcohol or the product itself – that can create a public health problem. The priority must be encouraging and supporting a variety of culturally sensitive, targeted, and appropriate programs and policies that promote responsibility and otherwise address *why* certain individuals choose to abuse alcohol.

¹⁰ Task Force of the National Advisory Council on Alcohol Abuse and Alcoholism. (2002). *How to reduce high-risk college drinking: Use proven strategies, fill research gaps*. Bethesda, MD: National Institutes of Health. See also Academis ED SBIRT Research Collaborative. (2007). The impact of screening, brief intervention, and referral for treatment on emergency department patients’ alcohol use. *Annals of Emergency Medicine*, 50, 699-710.e6.

Brewers Association of Canada

Submission to the World Health Organization

November 2008

Introduction

The Brewers Association of Canada (BAC) is the national association representing brewers licensed to operate from coast to coast in Canada. The Association membership is comprised of 17 companies which account for more than 97% of domestic beer enjoyed in Canada and abroad.

Brewers have been operating businesses in Canada for over 350 years. Each year the brewing industry generates more than 1.2% of the GDP (over \$12 billion) and direct full-time employment for more than 13,000 Canadians with another 153,000 jobs generated indirectly.

In 2007, the volume of sales in the Canadian beer market was 22.9 million hectolitres, 13% of which was imported and 87% domestic. Average annual per capita beer consumption is 69.7 litres based on total population.

The Canadian brewing industry has long promoted the responsible consumption of its products, and most Canadians consume and enjoy alcohol beverages in a responsible manner.¹

World Health Organization Consultation

The World Health Organization (WHO), in developing a global alcohol strategy as called for by World Health Assembly (WHA) Resolution WHA61.4, is seeking

¹ Health Canada. Canadian Addictions Survey (CADS), A National Survey of Canadians' Use of Alcohol and other Drugs, 2007.

views on measures to reduce the harmful use of alcohol. WHO has requested information on: i) the contributions of organizations in reducing alcohol misuse; ii) effective domestic strategies; and, iii) from a global perspective what are the best approaches. BAC welcomes the opportunity to participate in this consultation process and communicate the experience of the brewing industry in Canada.

I. Industry Programs and Initiatives

Over the years, the Canadian brewing industry has worked closely with partners and stakeholders in seeking to reduce alcohol misuse in its various forms, including addressing issues of general health, fetal alcohol spectrum disorder (FASD), impaired driving, binge drinking, and misuse among specific populations including young adults. Examples of such cooperative initiatives include:

- **National Alcohol Strategy** - In 2006 and early 2007, the Brewers Association of Canada, along with participants drawn from the distilling and wine industries, provincial liquor boards, federal and provincial/territorial governments, NGO's, and academia-research, met to develop a National Alcohol Strategy (NAS). This working group produced: *"Reducing Alcohol Related Harm in Canada: Toward a Culture of Moderation, Recommendations for a National Alcohol Strategy"*. The NAS is a landmark initiative which has as its objective the development and maintenance of a culture of moderation.
- **SBIR: Screening, Brief Intervention and Referral** – The Brewers Association of Canada, Spirits Canada and the Canadian Vintners Association (CVA) are all contributing financial support to the SBIR initiative with the College of Family Physicians of Canada (CFPC) and the Canadian Centre on Substance Abuse (CCSA). SBIR will assist health professionals in advice and referral, based on their professional assessment, to patients at risk or who may have already have alcohol-related problems, including advice concerning fetal alcohol spectrum disorder (FASD). This program is a derivative of the original BAC's ARAI

program (Alcohol Risk Assessment and Intervention) launched in the early 1990's. Recent research from the U.S. government, National Institute on Drug Abuse and the Substance Abuse and Mental Health Services Administration (SAMHSA), concludes that SBIR programs reduced heavy alcohol consumption rates by 38.6% among patients.²

- **Canadian Foundation on Fetal Alcohol Research (CFFAR)** – In September 2007, CFFAR, an independent non-profit foundation, was created to support research related to Fetal Alcohol Spectrum Disorder (FASD) with a \$1 million contribution over five years from the BAC and its member companies. A year after its launch, CFFAR announced three inaugural grants. These grants were peer-reviewed according to the standards of the Canadian Institutes of Health Research (CIHR) and will examine how prenatal exposure and stress interact to increase vulnerability to addiction; detection methods for FASD in children; and memory changes that occur in FASD children.
- **Fetal Alcohol Canadian Expertise (FACE) Research Roundtable** – Since 1999, the BAC has contributed to the support of the FACE conference which brings together over 200 Canadian FASD researchers on an annual basis – presenting scientific findings for peer review and identifying the next steps in the fight against FASD.
- **Student Life Education Company (SLEC)** - SLEC is a not-for-profit organization established in 1986 dedicated to enhancing the quality of student life in Canada by working with students and schools nationwide to encourage healthy decision-making about drinking alcohol. BAC supports SLEC with respect to student programs and messaging, and has in the past contributed towards research to better effect changes in youth attitudes and behaviour involving alcohol consumption.

² Madras, B.K. et. al. "Screening, brief interventions, referral to treatment (SBIRT) for illicit drug and alcohol use at multiple health care sites: Comparison at intake 6 months later", Drug and Alcohol Dependence, In Press, October 2008.

- **Motherisk Program** –The BAC finances the Motherisk national toll-free Alcohol and Substance Use Helpline. This confidential and bilingual toll-free service connects callers, primarily new and expectant mothers, with trained medical personnel who can answer questions, provide information, or point them towards treatment and support options.
- **Caring Together Program** - The industry in the past has worked closely with the Native Physicians Association in Canada (NPAC) in the development of culturally sensitive resources for the aboriginal community, including a board game using traditional native imagery and teachings to explore alcohol-related issues.
- **Traffic Injury Research Foundation of Canada (TIRF)** – A national independent road safety institute, TIRF’s mission is to reduce traffic related deaths and injuries. With ongoing funding from the BAC, TIRF has conducted research on effective public policy and technological measures in aimed at reducing impaired driving, and addressing the problem of the “hard core” drinking driver or repeat offender. These measures have attracted attention from lawmakers and policy experts throughout the world.
- **ABMRF/The Foundation for Alcohol Research** – ABMRF is a non-profit independent research organization established in 1982 that provides support for scientific studies on alcohol consumption and prevention of misuse of alcohol beverages. It is one of the few organizations in the United States and Canada which provides support for research in the physiological, epidemiological, behavioural and social science in this field. Since its inception, the BAC and brewers in the United States have funded the ABMRF which is associated with Johns Hopkins University in Baltimore, Maryland and is internationally recognized as a leading research institution on alcohol issues.

- **Responsible Consumption Messaging** - In addition to these efforts, since 1981, the Canadian brewing industry has strived to effect changes in the social conscience of Canadians when it comes to alcohol consumption and misuse, utilizing all available media and collateral materials, including public service advertisements.
- **International Activities** – Social responsibility initiatives are also supported by the brewing sector at the international level. The Worldwide Brewing Alliance (WBA) publishes a “Global Social Responsibility Initiatives” report which details activities by brewing companies and their Associations at the global level in addressing alcohol misuse. The WBA also produces a global report on drinking and driving which on a country by country basis describes the legislation governing drinking and driving, legislative changes, statistical trends and industry programs.

II. Canadian Strategies

Canada’s National Alcohol Strategy (NAS), *“Reducing Alcohol Related Harm in Canada: Toward a Culture of Moderation, Recommendations for a National Alcohol Strategy”*, recognizes the notion of sensible alcohol consumption, that alcohol has a place in society and that people who do drink moderately benefit.

This is borne out by over three decades of medical research which shows moderate drinkers tend to have better health and live longer than those who are either abstainers or heavy drinkers.

The range of benefits associated with sensible drinking is not limited to having fewer heart attacks but also extends to reducing or preventing diabetes, rheumatoid arthritis, bone fractures and osteoporosis, kidney stones, digestive ailments, gallstones, and poor physical condition in elderly.³

³ A summary of 142 complete citations from scientific and medical journals and conference proceedings is published by the Brewers of Europe, “The Effects of Moderate Beer Consumption: A Digest of the Current Scientific Literature, 4th Edition 2008”.

Resolution WHA61.4 calls for an evidence-based global alcohol strategy. Such an approach must recognize the strong and consistent relationship between moderate consumption and health benefits, not apparent in tobacco.

Alcohol strategy in Canada also:

- differentiates between responsible consumption and misuse;
- seeks the knowledge, input and experience of all stakeholders, including industry;
- stresses the development of partnerships between industry and the larger community, including addiction experts, researchers, academics, NGOs and government, and like any good partnership are long-term;
- supports and encourages research leading to a better understanding of alcohol misuse and the development of new initiatives; and,
- emphasizes targeted programs and education.

With respect to the last point, in 2005, after hearing testimony from health and addiction experts, a Parliamentary Health Committee determined that targeted programs and education would have a better chance of success than the introduction of alcohol beverage warning labels.⁴

As with warning labels, the use of taxation for social policy purposes also is challenged. Attempting to restrict demand for alcohol by raising the costs through higher taxes, ignores the reality that alcohol is a complex good composed of different beverage types such as beer, wine and spirits as well as quality brands that can be high, medium or low-end.

Higher taxes have the effect of driving product choice to cheaper beverage or brand alternatives.⁵ There is also evidence that consumption may actually increase as individuals choose to drink more of an inexpensive product because

⁴ House of Commons Standing Committee on Health. 8th Report to Parliament, Bill C-206, An Act to Amend the Food and Drugs Act (warning labels regarding the consumption of alcohol), Ottawa, 2005.

⁵ Gruenewald, Paul J. et. al. Alcohol prices, beverage quality and the demand for alcohol: Quality substitutions and price elasticities, *Alcoholism: Clinical and Experimental Research*, 30(1): 2006.

of price savings. This may be especially true for vulnerable groups like young adults.

Social Reference Pricing

In addition to the National Alcohol Strategy and the various targeted programs and education initiatives already referenced, the Canadian approach also includes a mechanism called Social Reference Pricing (SRP). SRP is government regulated minimum prices below which retailers and/or licensees may not sell to the public. SRP, which can apply to all brands and alcohol beverage types, can have a more certain effect on price. This provides an additional policy lever to discourage problematic consumption of alcohol, while at the same time driving government tax revenues when taxes are ad valorem (% of price). On this basis, government can indirectly increase tax revenue through action on an effective social policy instrument.

It should be emphasized that Canada has evolved a unique alcohol beverage control system where the control and sale of alcohol beverages are primarily the functions of each of the provinces and territories, and which includes a mix of private and government-owned retail operations. SRP should be viewed within this Canadian context.

III. Global Perspective

At the same time, SRP may be considered as a tool worth exploring for its learnings, as part of a broader package of measures in addressing alcohol misuse. From a global perspective, it is important to recognize that:

- People do consume alcohol moderately and do lead healthy and productive lives;
- The destruction of the culture of moderation is not a desirable goal;

- Significant resources and commitment are required and efforts should involve governments, alcohol and addiction agencies, researchers and economic operators;
- Partnerships between industry and concerned individuals and NGOs based on mutual trust and respect should be encouraged; and,
- Targeted programming and education that directly engage those at risk offer the best effective alternative when compared to excessive policy measures.

Conclusion

The BAC believes that an approach which accepts moderate alcohol consumption as a part of a healthy lifestyle; which does not seek to de-normalize responsible drinking; and which incorporates long-term cooperation and partnerships between industry, medical and addiction experts and government, for the delivery of targeted programs and education, offers an effective framework for the formulation of a global alcohol strategy and the reduction of alcohol misuse.

Word count: 1861

Bacardi Limited Submission to WHO Consultation on Ways to Reduce the Harmful Use of Alcohol

Thank you for allowing the Bacardi Limited group to participate in the WHO consultations with the beverage alcohol industry on November 6, 2008. As a founding member of the International Center for Alcohol Policies (ICAP), we endorse the papers recently submitted on its behalf addressing alcohol production, distribution, pricing, availability, marketing and reducing harmful drinking. We also submit this written document to demonstrate additional examples of our commitments to combat the harmful use of beverage alcohol products.

Bacardi Limited produces, markets and distributes a variety of internationally recognised spirits. The company was founded in Cuba in 1862 when Don Facundo Bacardi revolutionised rum making by developing the world's first smooth light-bodied rum. Today Bacardi Limited has a portfolio of more than 200 brands including Bacardi rum, Martini vermouth, Dewar's Scotch whisky, Bombay Sapphire gin, Grey Goose vodka, and Cazadores tequila. Bacardi distributes its brands in more than 100 countries around the world, either directly through its own distribution businesses or through distribution agreements with local businesses.

We recognize that a business the size of ours touches many people's lives and we have responsibilities to those people and to their communities. In addition, while most people enjoy our products responsibly, there are some who engage in the harmful use of our products. Bacardi Limited is committed to the responsible consumption of our products and continues to work with and fund programs to prevent their harmful use. The following examples demonstrate our commitment.

Responsible Marketing

Our commitment to the responsible marketing and promotion of our products is reflected in several self regulatory activities that are vital tools used by our company and our industry to address alcohol harm.

Bacardi operates under a global company marketing code, which is described as Bacardi's Global Marketing Principles. Details of this code are available on our website, www.bacardilimited.com.

- This program is supported by a clearance procedure where marketing materials are signed off by General Managers or, in the case of our primary brands, specified External Affairs Managers, who are independent of the promotional process.
- This program is supported by a training course called Bacardi Marketing Way, where our own marketing people and their agencies are trained in how to use these Principles. The training course is supported by a separate publication called Social Responsibility Guidelines for the Interpretation of the Principles & Procedures for

Marketing. This training program was launched in 2007 and is an ongoing feature within our business.

In addition to the global marketing code of our company, we participate in several industry marketing codes in developed and emerging markets.

In the United States, we adhere to The Distilled Spirits Council of the United States' Code of Responsible Practices for Beverage Alcohol Advertising and Marketing (www.discus.org). This Code builds on our responsible practices and ensures transparency and commitment to responsible marketing practices in the United States. In Europe, we abide by marketing code of The European Forum for Responsible Drinking (EFRD) which is incorporated into the CEPS Charter and is independently audited. In México, we adhere to the industry marketing code called "Código para la Promoción y Venta de Bebidas con contenido de Alcohol en México." In Asia, marketing codes based on self regulation principles are being developed for the key countries in the region through an initiative led by ICAP and we support the initiative.

Responsibility Awareness and Educational Programs

Bacardi supports awareness and educational programs that bring awareness to the issues of harmful use of alcohol and educate people regarding the responsible use of beverage alcohol.

Bacardi's Global Drink Drive Program - In January 2008, Bacardi Limited launched a new initiative with the help of Michael Schumacher, 7x Formula 1 World Champion, who agreed to become Bacardi Limited's global Social Responsibility Ambassador to help raise awareness of the key message that drinking and driving do not mix. This global program was formally launched in April 2008 in Brussels. The campaign operates in over 45 countries internationally, with concentration in Europe, Asia, and select markets in Latin America. More details can be found at www.championsdrinkresponsibly.com. Michael Schumacher is personally committed to promoting road safety campaigns with the United Nations, with UNESCO, the Commission for Global Road Safety and also through the FIA, where he has recently become Foundation Trustee. This campaign is a corporate activity by Bacardi Limited and is disconnected from any commercial activity involving the promotion of our brands.

The Century Council - In 1991, Bacardi and other industry companies founded The Century Council, a non-profit organization dedicated to fighting underage drinking and drunk driving in the United States. Programs such as "Ask, Listen, Learn" serve to educate young people about the harmful effects of alcohol on the body, especially at a young age when the brain and other organs are developing. We encourage you to visit www.centurycouncil.org to learn more about their programs and initiatives.

Partnering with Governments - In 2007, Bacardi joined with the U.S. government and our industry colleagues to launch a national campaign to prevent underage drinking. Called "We Don't Serve Teens", the campaign provides parents and other concerned

parties with information and tools to reduce teen drinking and related harm (www.dontserveteens.gov).

On-Premise Server Training Sponsorship – Bacardi Limited supports the International Bartenders Association’s social responsibility on-premise server training courses. At the global level, the International Bartenders Association (IBA) is the reference organisation for the bartending profession. The federation is comprised of the barmen trade associations of 52 countries with more than 40,000 members working on all five continents. Our long-term commitment to this project began in 2006 when Bacardi facilitated the production of “Moderation & Responsibility,” an introductory manual on social responsibility focused on the bartender. The manual is augmented by a work book called “A Guide to Social Responsibility,” which the IBA is using with its trainers to facilitate courses and workshops where bartenders get practical instruction and education on serving drinks responsibly.

EU Road Safety Charter -Bacardi Limited became a signatory of the charter in April 2008 in connection with launch of the “Champions Drink Responsibly” campaign with Michael Schumacher that is noted above. Bacardi Germany pioneered this initiative for our group, having become a signatory in 2005 following the launch of its innovative responsibility program “Drivers Corner”.

These projects are in addition to the many projects that Bacardi Limited supports indirectly through other established industry social aspects organisations such as the regional European Forum For Responsible Drinking, and national bodies across the EU, like The Portman Group and Drinkaware Trust in the United Kingdom, MEAS in Ireland and Entreprise et Prevention in France. In Mexico, we are members of the “Fundación de Investigaciones Sociales, A.C.”, a social aspect organization which promotes a responsible approach to drinking. In Australia, Drinkwise serves the same goal.

Effective Public Policies

Bacardi Limited also supports the adoption of appropriate and effective public policies that target the harmful use of alcohol products.

Through our membership and participation in ICAP, we have supported the development of public policy research and multiple recommendations that could be adopted by national and local governments around the world to reduce the harmful use of alcohol. Examples can be found at www.icap.org.

Conclusion

Bacardi Limited acknowledges that more needs to be done by companies, governments, communities and individuals to address the harmful use of alcohol. We were pleased to

participate in the consultation sponsored by the WHO and appreciate the opportunity to develop a constructive dialogue. We remain interested in working with the WHO and other stakeholders in a balanced process to address the many issues involved in the harmful use of alcohol. We look forward to consulting with you further.

BACARDI LIMITED

BERMUDA

November 14, 2008

Distilled Spirits Council of the United States
Submission to World Health Organization
15 November 2008

Q1. What are your views on effective strategies to reduce alcohol-related harm?

For over 5,000 years, people have consumed various forms of beverage alcohol as a normal part of a variety of social activities. Most people who drink beverage alcohol do so moderately and responsibly consistent with a healthy lifestyle. Only a minority of drinkers abuse alcohol and cause problems for themselves or others.

The United States has had the unique experience to have a total prohibition on alcohol and subsequent repeal. National prohibition of alcohol (1920-33) was undertaken to reduce crime and corruption, improve health and solve social problems, but all evidence demonstrates its failure. Illicit alcohol production increased, alcohol became more dangerous to consume and crime increased. There were no measurable gains made in economic and health objectives, yet prohibition removed a significant source of tax revenue and greatly increased government spending.

The repeal of Prohibition, the 21st Amendment, gave control over regulation, legislation and enforcement to each of the States. In this manner, each state could take into account its unique cultural, social and economic differences.

While we still have progress to make, the United States has made great strides in reducing all forms of alcohol abuse, including drunk driving and underage drinking. This dramatic historical lesson should be taken into account as the WHO develops a strategy to reduce alcohol-related harm. It is clear that a one size fits all solution does not work. As has been noted in the Resolution, each country must take into account their cultural, social and economic richness and diversity as they develop their own unique strategy to reach our common goal of reducing harm from the alcohol misuse.

Q2 From a global perspective, what are the best ways to reduce problems related to harmful use of alcohol?

Illicit and Non-Commercial Alcohol

Noncommercial alcohol beverages have a rich history in most cultures and represent as much as half of the total worldwide consumption of alcohol beverages. These products are not advertised and exist largely outside of the regulatory framework governing commercial alcohol products. Many noncommercial and illicit alcohol beverages are of poor quality and can present serious health risks. Nevertheless, they are the most understudied areas of alcohol policy research.

Limitations of Population-Based Alcohol Policies

Population-based government policies aimed at restricting the sale and consumption of commercial alcohol will have the unintended consequence of increasing the production and consumption of noncommercial and illicit alcohol – which exist outside regulatory controls designed to protect public health.

As well known, commercial beverage alcohol is the most heavily regulated consumer product. These laws proscribe and prescribe various activities. Beverage alcohol is intended for adult consumption, and should only be consumed by people above the legal drinking age. People should refrain from engaging

in certain activities when they have been drinking. For example, no one should drive while intoxicated or serve alcohol to obviously-intoxicated persons. We fully support and participate in programs to ensure the vigorous enforcement of the laws.

History has shown that population-based approaches that attempt to promote temperance generally – such as increased taxes, bans on sales and advertising, and prohibition – will not stop that minority of people who engage in problem drinking or alcohol abuse. Scientific evidence does not support the hypothesis that population-based approaches will change problematic drinking patterns. In fact, such measures often have unintended consequences that may decrease – rather than increase – public health and safety, such as shifting consumption to low-quality non-commercial alcohol and increasing illegal trafficking in smuggled or counterfeit goods. Moreover, population-based approaches cannot differentiate between those who exhibit problematic drinking patterns and the vast majority of drinkers who consume alcohol moderately. The scientific literature has reported that moderate consumption may be associated with potential health benefits for some individuals.

The Value of Targeted Interventions

Targeted intervention programs have well-documented success in changing drinking patterns and behavior among problem drinkers. Targeted interventions are pragmatic, flexible, efficient, and culturally-sensitive approaches to the complex issue of why some people drink to excess. Targeted interventions identify the particular individuals, populations, and settings in society where harmful drinking patterns exist and focus exclusively on them, rather than society at large. By targeting only those people with problematic drinking patterns, and understanding the factors leading to their inappropriate alcohol consumption, alcohol abuse and its consequences can be significantly reduced without penalizing moderate drinkers, responsible drinkers. In fact, research has shown that decreasing consumption among problem drinkers while not altering the drinking patterns of moderate, responsible drinkers will result in the most optimal public health.

Early identification and brief intervention strategies are extremely effective. These approaches – which can take place in doctors' offices, pharmacies, kiosks, and a host of other settings – can be used to reach problem drinkers who otherwise may lack access to adequate health care. Early identification promotes health by focusing the interventions at a time when behavior is most amenable to change. Other kinds of targeted intervention programs can be tailored to address particular issues, including drinking and pregnancy, excessive drinking, and responsible hospitality. For example, drunk-driving programs – including responsibility advertisements, educational campaigns, server training, and “designated driver” programs – have proven to be very successful complements to the enforcement of laws targeting drunk driving, and have contributed to the substantial reduction in alcohol-related traffic fatalities in countries across the globe. Targeted interventions are an important way in which governments, public health organizations, and alcohol producers can partner together in fighting alcohol abuse and underage drinking.

Moderate Alcohol Consumption

It is widely known that the abuse of alcohol leads to a variety of negative health outcomes. Scientific consensus also shows that moderate consumption of alcohol has potential health benefits for some people. The lowest all-cause mortality occurs at an intake of one to two drinks per day. Research shows that moderate drinking is associated with a reduced risk of cardiovascular disease, Type 2 Diabetes, gastrointestinal disease, some forms of dementia, osteoporosis, and obesity. Again, targeted interventions can effectively focus on those who drink to excess without negatively impacting those who

may derive health benefits from drinking moderately.

Advertising

Long before the first beverage alcohol commercial aired on television or appeared in a magazine, some people have consumed too much alcohol and young people have experimented with drinking. These behaviors exist today even in parts of the world with limited access to advertising and mass media. Indeed, in many parts of the world people drink noncommercial alcohol that is not even advertised – even in countries where alcohol advertising is banned entirely. Notably, where there have been clear increases in alcohol advertising in various parts of the world, drinking has declined over decades or remained flat. Decades of research have not shown that alcohol advertising causes an individual, including a young person, to drink or abuse alcohol.

Alcohol advertising influences brand choice; it has not been shown to increase overall alcohol consumption. Advertising is an important method of communicating information to our customers. It also is a means to promote free and fair trade, and is essential to foster innovation and new products. Without advertising, market entry is impeded and brand competition is undermined.

International Trade Policy

Increasing international trade contributes to the economic development of both developed and developing countries. Excluding beverage alcohol products from trade agreements is an ineffective and inefficient way of attempting to influence alcohol policy or advance public health. World Trade Organization (WTO) agreements (including the GATT and GATS) do not undermine the non-discriminatory alcohol (or other health) policies of individual countries, nor do they prevent member countries from setting taxes or maintaining production or distribution monopolies. The WTO merely requires equal treatment for like products that are imported and domestically produced.

Conclusion

While progress has been made, everyone can agree that there is more to do in preventing and reducing alcohol abuse and there is much common ground among various stakeholders that can form the basis of effective, long-term partnerships to reach this common goal. The distillers are committed to continuing to develop, implement, and support a broad array of targeted intervention programs to prevent and reduce alcohol abuse, and we look forward to working with other stakeholders in this process.

Q3 In what ways can your organization contribute to reduce harmful use of alcohol?

The Distilled Spirits Council of the United States (DISCUS) is the national trade association representing America's leading distillers and nearly 80% of all distilled spirits brands sold in the U.S. Over the years, the Council has served as the distillers' voice within the U.S. and foreign capitals worldwide. Our strong commitment to responsibility is the foundation of everything we do as an organization and as an industry. For example:

Educational Tool Kit on Beverage Alcohol Consumption (Educational Tool Kit)

Educational Tool Kit is a public/private partnership that provides evidence-based resources for health care professionals to help better ensure that those patients who choose to consume alcohol do so moderately

and responsibly by promoting the alcohol guideline set forth in the United States *2005 Dietary Guidelines for Americans (Dietary Guidelines)* and provides them with tools to better answer questions that their patients may have on alcohol and to identify and reduce alcohol abuse.

The 2008 Revision of the *Educational Tool Kit* (originally published in 2001), reviewed by a Scientific Advisory Panel and endorsed by partners, including American Medical Women's Association, American Academy of Nurse Practitioners, American Academy of Physician Assistants, Distilled Spirits Council, Nutrition Educators of Health Professionals, a Dietetic Practice Group of the American Dietetic Association, National Medical Association, Society of Teachers of Family Medicine, and the U.S. Department of Agriculture MyPyramid Corporate Challenge, is a compendium of resources including: *2005 Dietary Guidelines*, National Institute on Alcohol Abuse and Alcoholism's (NIAAA) *Clinician Guide*, scientific reprints, assessment tools, patient handouts, a syllabus for free Continuing Education from the University of Florida, and referral information for health care professionals to facilitate patient discussions on alcohol consumption and provide materials for early screening and brief intervention. The *Educational Tool Kit* is provided free of charge in various formats, including three ring binder, CD and website (www.alcoholtoolkit.org).

Health authorities recommend increased discussion between health care professionals and patients on alcohol as a means to positively influence behavior. For example, "Your patients look to you for advice about the risks and benefits associated with drinking. Research, in fact, demonstrates that simply discussing your concerns about alcohol use can be effective in changing many patients' drinking behavior before problems can become chronic." (NIAAA, 2003). The *Educational Tool Kit* program can facilitate health professionals' discussions on alcohol by providing resources for responding to patient questions, identifying alcohol abuse, providing intervention and, according to research, work towards reducing alcohol abuse.

CODE OF RESPONSIBLE PRACTICES FOR BEVERAGE ALCOHOL ADVERTISING AND MARKETING (www.discus.org/responsibility/code.asp)

Within months of the repeal of Prohibition, leaders in the distilled spirits industry approved their first voluntary Code of Responsible Practices. Throughout the decades, the Distilled Spirits Council's Code of Responsible Practices has embodied the high standards and commitment to responsibility that have been the touchstone of DISCUS member company advertising practices.

The provisions of the Code apply to every type of print and electronic media, including the Internet and any other online communications, used to advertise or market beverage alcohol. These provisions also apply to every type of promotional or marketing activity or event, including all product placements. By this Code, DISCUS members hold themselves to a standard higher than mandated by any law or regulation. Since October 27, 1934, the distillers' voluntary Code has been revised and updated as the marketplace and technology have changed.

Throughout its long history, the core principle of the voluntary DISCUS Code has been and remains to market our products to adults in a responsible and appropriate manner. The Federal Trade Commission, the lead Federal agency with advertising oversight, has commended the DISCUS Code on several occasions. In its September 2003 Report to Congress entitled "Alcohol Marketing and Advertising," the FTC concluded that the distilled spirits industry's advertising is directed to adults and that the distilled spirits industry's self-regulatory measures are "rigorous" and effective. The FTC has pointed to the benefits of industry self-regulation, concluding that it is realistic, responsive and responsible; can deal quickly and flexibly with a wide range of advertising issues without the rigidity of government regulation; and is particularly suitable in light of the First Amendment issues that otherwise would be raised by government regulation of advertising.

The 2003 Code applies to all of the over 2,800 distilled spirits, beer and wine brands marketed by DISCUS members, and is followed by an increasing number of non-member distilled spirits marketers. There has been 100% compliance on decisions for members and over 80% compliance for non-members. Importantly, decisions and actions in the marketplace are rapid. For example, for members, the average time from a complaint regarding an advertisement to a Code Review Board decision and subsequent change in the market place (ie; advertisement is pulled if Code Review Board votes that it is against the Code) is within weeks. Anything similar could take years within a government regulatory framework.

Further, the Code provides for the issuance of Semi-Annual Reports. To make the distilled spirits industry's review process more transparent and understandable to the public, a decision was made in 2003 by DISCUS and its member companies to publish semi-annual public reports detailing complaints against specific advertisements, decisions of the industry's internal review board and actions taken by each advertiser. This new transparency allows the public at large to better evaluate and appreciate our Code review process. In fact, industry regulators, watchdogs, critics, and the media have taken notice of the distilled spirits industry's approach to self-regulation, calling it a model for other industries. In 2005, following the release of the first DISCUS Semi-Annual Report, the director of the FTC's alcohol advertising program told *The Washington Post* that self-regulation permits the spirits companies to "address things that couldn't be touched by a government agency because of the First Amendment."

These examples demonstrate DISCUS leadership in alcohol policy and partnership programs. We believe that our model of effective self-regulation, and expertise in partnerships to develop and implement successful programs can assist other member states in a common goal of reducing harm associated with alcohol abuse while preserving the rights moderate, responsible beverage alcohol consumers.



**World Health
Organization**

**Department of Mental Health and Substance Abuse
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