



**ALCOHOL  
BEVERAGES  
AUSTRALIA**

# **ABA SUBMISSION: WHO GLOBAL ALCHOL ACTION PLAN – (FIRST DRAFT)**

SEPTEMBER 2021

# About Alcohol Beverages Australia

Alcohol Beverages Australia (ABA) is the pan-industry body representing the many award-winning beer, wine, and spirit producers, distributors and retailers that operate legally and responsibly across Australia. Our role is to ensure that regulations are balanced so there is stability and certainty in the market to drive investment, while acknowledging and working with all stakeholders to minimise the harms associated with alcohol misuse. ABA advocates for evidence-based regulation and policies which target specific at-risk groups as the most effective way of changing behaviour associated with alcohol harm.

*Here's to  
responsibility*

## Introduction

ABA welcomes the opportunity to provide feedback on the first draft of the Global Alcohol Action Plan 2022-2030 (Action Plan). The Action Plan provides an important guidance at a global level to assist Member States to be able to set policies that are appropriate and proportionate to their local contexts.

For the Action Plan, which is set at the global level, to allow for successful implementation by Members States we submit that the Action Plan must focus on the reduction of harmful alcohol consumption (as opposed to alcohol consumption per se) and ensure that a full set of policy options are available. Without a flexible set of options that move beyond SAFER and a focus on harmful alcohol consumption, then the Action Plan may inhibit the ability of governments to respond to the local context of many member states.

Economic operators also have an important role to play when it comes to the reduction of harmful alcohol consumption. As outlined in our submission below, in Australia, economic operators have successfully played a role in the reduction of harmful alcohol consumption. With the genuine steps that our industry has taken to reduce harm, it is important to ensure that economic operators are included in the Action Plan as stakeholders that are able to provide unique and valuable input.

We hope that the information in our submission below is of assistance and look forward to providing further input into the Action Plan.

## Action Plan Alignment with 2020 Executive Board Mandate

The 2020 Executive Board mandate endorsed the importance of the Global Strategy as the primary global alcohol policy<sup>1</sup>. As such, the action plan must be consistent with this mandate. This alignment can be achieved by the Action Plan ensuring a focus on reducing harmful alcohol consumption as well as recognising the full menu of policy options included in the Global Strategy.

### *Reducing Harmful Alcohol Consumption*

The Action Plan has described the world-wide trends of reduction in harmful alcohol consumption as being not 'considerable'.<sup>2</sup> While we will leave it for other jurisdictions to comment on their progress in reducing harmful alcohol consumption, we can say with confidence that in Australia the indicators for a shift in harmful alcohol consumption have been exceptional<sup>3</sup>:

- In 2004, 9.1% of people drank daily compared to 5.4% in 2019. This represents a 40.7% decrease in the proportion of Australians drinking daily.
- The proportion of Australians drinking at lifetime risky levels decreased 20.3% from 2004 to 2019 (21.1% to 16.8% respectively), reflecting a decrease in harmful drinking in Australia.
- In 2004, 30.0% of Australians drank at single occasion risky levels, which has decreased to 24.8% in 2019. This represents a 17.3% reduction in single occasion risky drinking in Australia.

In addition, when it comes to youth behaviours and alcohol<sup>5</sup>:

- In 2004, the average age of initiation for young people aged 14-24 was 14.8 years, compared to 16.2 years in 2019.
- The proportion of youth (aged 15-24) abstaining from alcohol has increased from 22.3% in 2010 to 32.5% in 2019, reflecting a 45% increase in the number of youth drinking and the growing culture of responsible drinking in Australian youth.

To better reflect the considerable global outcomes when it comes to harmful drinking, we suggest that Australia is used as a case study to highlight the exceptional strides that have been made to reduce harmful alcohol consumption and the immense success that has been achieved.

It is also important to ensure that the Action Plan remains focused solely on the harmful consumption of alcohol. Moving away from a focus on the harmful consumption of alcohol would be a move away from the mandate set by Member States<sup>4</sup>. To assist Member States in reducing harmful alcohol consumption it is important for the Action Plan to remain consistent with this mandate set by Member States.

The movement away from harmful alcohol consumption to alcohol consumption per se has been reflected in the new target set of 20% relative reduction in the consumption of alcohol per capita by 2030. This target is the only outcome target within the plan. It is not clear how or why this target has been set. This target is problematic because:

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<sup>1</sup> World Health Organisation. 2020. *Executive Board 146<sup>th</sup> Session. EB Decision 146(14)*.

<sup>2</sup> World Health Organisation. 2021. *Actional Plan on Alcohol: First Draft*. Pg. 10

<sup>3</sup> The Australian Institute of Health and Welfare, 2020. *National Drug Strategy Household Survey 2019: Alcohol Chapter (Supplementary Data Tables)*

<sup>4</sup> World Health Organisation. 2020. *Executive Board 146<sup>th</sup> Session. EB Decision 146(14)*.

- It is inconsistent with the 10% relative reduction by 2025 Member States agreed to as part of the GAPNCD.<sup>5</sup>
- The target's focus on reducing consumption and not harmful consumption is inconsistent with evaluating the Member State agreed metrics of heavy episodic drinking, alcohol related mortality and alcohol related morbidity.

As such, the target of 20% relative reduction in the consumption of alcohol per capita should be removed from the Action Plan.

#### *Recognition of full menu of policy options*

The Global Strategy provided a broad package of policy options and interventions that produce an effective means for reducing the harmful use of alcohol across the unique situation of each Member State. In order to ensure that these options are given full recognition consistent with the 2020 Executive Board Mandate the Action Plan must reflect the broad package of policy options and interventions in the Global Strategy.

In particular, the Action plan should not limit the choice of policy options for each Member State by restricting the available policy choices to those options in SAFER or defining success based on the implementation of those options. The exclusive promotion of SAFER policies fails to recognise the need for individual approaches within Member States appropriate to their own unique contexts.

For example, in Australia the indicators provide evidence for a population wide shift in drinking behaviours in Australia (see outline above of key indicators). It may not be appropriate for Australia to implement SAFER options and instead focus on different policies that would be more appropriate to our population and drinking culture. As such, it would not be appropriate to limit Australia, and other Members States to only SAFER policy options.

In addition, evaluating Australia against implementation of the SAFER options, which may not be the most appropriate mechanisms to reduce harmful alcohol consumption in our context, would not reflect the significant strides we have made in reducing harmful alcohol consumption. As such, it is inappropriate for the Action Plan to track progress against the SAFER initiatives only as has been suggested.<sup>6</sup>

## **Economic Operators**

#### *Incorporation of economic operators with a whole-of-society approach*

It is unfortunate that at times economic operators in the alcohol harm reduction space are described as 'interfering' and are viewed as inherently conflicted, possessing no positive means of being able to positively contribute to alcohol harm reduction.

In reality, economic operators play both a significant and unique role in the reduction of harmful alcohol consumption. In fact, economic operators are positively entailed in the reduction of harmful alcohol reduction and their role in doing so is taken very seriously.

In Australia, we have seen significant contribution by our economic operators in leveraging their unique abilities in reducing alcohol related harm. Appendix A to this submission provides an outline of some of the many contributions that economic operators in Australia have made to reduce alcohol related harm. This work includes the areas of:

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<sup>5</sup> World Health Organisation. Global Action Plan for the Prevention and Control of Noncommunicable Diseases 2013–2020. Annex. Pg. 7

<sup>6</sup> The first target (1.1) for the action plan proposes tracking progress solely on a MS's implementation of the SAFER initiative.

- Limiting marketing and sales of alcohol to children and youth
- Education campaigns and labelling initiatives to allow consumers to make informed choices
- Development online sale codes of conduct

From the actions of economic operators it is clear that they have made genuine and continued commitments to the reduction of harmful alcohol consumption. This commitment should be embraced and encouraged through partnerships with economic operators to ensure all parties are working together to produce the best possible outcomes for communities.

In order to ensure that all possible means of reducing harmful alcohol consumption are leveraged it is important that economic operators continue to be viewed and treated as all other stakeholders who are entailed in reducing alcohol harm. The Action Plan should embrace the opportunities presented by economic operators and ensure they are treated on par with other stakeholders within the whole-of-society approach to reducing the harmful use of alcohol as set out by the Global Strategy and 2018 UN Political Declaration on non-communicable diseases.<sup>7</sup>

### *Recommended Actions for Economic Operators*

The Global Strategy has clearly set out the standard for engagement for stakeholders as follows:

*the implementation of the global strategy will require active collaboration with Member States, with appropriate engagement of international development partners, civil society, the private sector, as well as public health and research institutions.*<sup>8</sup>

This standard is not reflected in the Action Plan. Instead, the Action Plan:

- Seeks to limit dialogue to unreasonably seeking economic operators to focus on the implementation of marketing bans<sup>9</sup>,
- Proposes the measure for economic operators to refrain from promoting drinking, which unacceptably requires companies to cease all marketing,<sup>10</sup>
- Creates a role for civil society to be ‘monitoring and countering undue influences from commercial and vested interests’<sup>11</sup>, in turn establishing a combative relationship between civil society and economic operators,
- Alienates economic operators by proposing ‘actions’ for non-state actors but ‘measures’ for economic operators with no explanation of the different approaches despite both stakeholders being subject to FENSA,<sup>12</sup> and
- Makes the unfounded claim of economic operators are ‘interfering with alcohol policy development and evaluation’.<sup>13</sup>

The examples highlighted require rectification in both approach and language in the Action Plan to instead create a respectful engagement environment for all stakeholders. It is only with mutual respect and equal engagement with all stakeholders that the best outcomes in reducing alcohol related harm can be achieved.

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<sup>7</sup> United Nations: General Assembly. Political declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases

<sup>8</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol*. Pg. 3

<sup>9</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol*. Pg. 18

<sup>10</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol*. Pg. 19

<sup>11</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol*. Pg. 21

<sup>12</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol*. Pg. 11

<sup>13</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol*. Pg. 21

## Framework Convention on Alcohol

In February 2020, the Executive Board did not take up a framework convention on alcohol.<sup>14</sup> Considering that the Executive Board did not pursue the idea of a framework convention it is unclear why the Action Plan refers to the lack of a framework convention as a barrier to the implementation of the Global Strategy.

As this issue has already been considered by the Executive Board, it is inappropriate for the continued promotion of the framework convention as a possible pathway that has support.

## Approach to Labelling

The approach in the Action Plan to labelling is rigid and contrary to the Global Strategy. In the Action Plan, the WHO secretariat is tasked with developing international standards for the labelling of alcohol beverages.<sup>15</sup> The Action Plan goes on to propose the Member States introduce labelling requirements to display ingredients, caloric values and health warnings.<sup>15</sup>

In the Global Strategy the suggested actions regarding labelling was a policy option for Member States to implement to provide better consumer information. The approach in the Action plan is out of line with the Global Strategy and as such should be removed. The need to remove this is even more pertinent considering that the matter of labelling on alcoholic beverages is currently being considered by CODEX and the outcome of this process should not be pre-empted.

## Taxation

The Global Strategy calls for an efficient taxation system that as part of an efficient taxation system, Member States consider *“regulating the sales of informally produced alcohol by including it in the taxation system”*.<sup>16</sup>

The Action Plan proposes that Member States consider a global tax on alcohol.<sup>17</sup> The premise being that the global tax be governed internationally and used to support the treatment of alcohol use disorders. This suggestion does not align with existing taxation laws or governance and as taxation is a competence for Member States this should be removed.

Taxation is a Member State Competence and actions taken should be contextually proportionate and appropriate.

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<sup>14</sup> World Health Organisation. 2020. *Executive Board 146<sup>th</sup> Session. Agenda item 7.2.*

<sup>15</sup> World Health Organisation. 2021. *Actional Plan on Alcohol: First Draft.* Pg. 18

<sup>16</sup> World Health Organisation. 2010. *Global Strategy to Reduce the Harmful Use of Alcohol.* Pg. 18

<sup>17</sup> World Health Organisation. 2021. *Actional Plan on Alcohol: First Draft.* Pg. 25

## **International Trade**

The Action Plan has expanded the role of the WHO Secretariat through the inclusion of two actions relating to international trade (both of which relate to alcohol-attributable health burdens on international trade) and suggest an expansion of the role of the WHO into international trade.

International trade is a competence of Member States and at a greater level, the competence of the World Trade Organization and the WHO Action Plan and international trade was not part of the remit of the Global Strategy, nor the mandate of the Secretariat.

## **Industry Funding of Alcohol Research**

There is a need for improved access to and funding to alcohol-related research. Economic operators have an interest in funding research related to their products, however, historically, research conducted by or funded by economic operators have been excluded or discredited by the research community and scientific journals as being biased.

The alcohol industry welcomes discussions to develop new models to allow the private sector to develop critical research partnerships to support high-quality and credible alcohol health and policy research, as well as program implementation and evaluation.

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## Appendix A

The alcohol industry in Australia is committed to the responsible consumption of alcohol. We focus on supporting effective programs that focus on education, awareness and changing behaviours relating to alcohol consumption. The alcohol industry works closely with stakeholders such as government, consumer groups and health professionals to implement solutions to excessive drinking.

### **DrinkWise**

The alcohol industry established and continues to fund DrinkWise Australia, an independent, not-for-profit organisation to help build a healthier and safer drinking culture in Australia. DrinkWise's board of directors is made of up both industry and community members.

Since its inception DrinkWise has delivered numerous major campaigns promoting responsible drinking and targeting what the evidence continues to identify as the two key drivers of underage drinking – parental drinking behaviour and peer group norms.

DrinkWise recognises that Australians are changing both the frequency of consumption and the amount we're consuming when we do have a drink. The outcomes of the 2019 NDSHS show positive trends in alcohol consumption in Australia, and reinforce DrinkWise's beliefs that its targeted social marketing campaigns and education activities are resonating with the broader community and particularly with those audiences at risk from excessive consumption.

Some of DrinkWise's initiative include the focus on the following:

#### The role of parents

- DrinkWise has placed a major focus on parents' roles as influencers and role models in their children's lives when it comes to their future consumption of alcohol.
- Launched in 2008, *Kids Absorb Your Drinking* marked DrinkWise's first generational change campaign (for further information see case study under heading *Achieving the Objectives of the Bill*).
- *Kids and Alcohol Don't Mix* was developed in 2009 to encourage parents to delay their child's introduction to alcohol. DrinkWise recognised that for many parents talking to their kids about alcohol and setting clear boundaries and expectations was a daunting task.
- Our approach with parents has continued to evolve through a partnership with parents site MamaMia where we provide parents with a forum to discuss their views and share their experiences.

#### How to Drink Properly (18-24 year olds)

- In 2014, DrinkWise launched an Australian-first social marketing campaign designed to influence young adults (18-24 years) to drink responsibly – by moderating the intensity and frequency of binge drinking occasions. Built around a series of animated online videos, the campaign features a suave, classy and confident character who bestows cheeky words of wisdom upon 'amateur' drinkers.
- Ongoing tracking research and an independent evaluation by a University consortium has indicated significant attitudinal and behaviour change among those who have seen the campaign, with the target audience indicating drinking less on a night out and utilising the various message platforms to communicate with their social group about the pitfalls of poor drinking behaviour.

- *How to Drink Properly* has been recognised through numerous international and Australian advertising, creativity and effectiveness awards.

#### You won't miss a moment if you DrinkWise

You Won't Miss a Moment if you DrinkWise is an industry first - a collaborative approach to conveying a unified moderation message which encourages sports fans, music lovers and festival-goers to drink responsibly and ensure they don't miss the most memorable moments of an event.

The initiative, targeting event attendees and those watching telecasts, has been seen and heard across AFL and NRL finals as well as the Spring Racing Carnival, Australian Open Tennis, Surfing Australia events and the 2015 World Cup of Cricket.

#### Labelling Initiative

- In 2010, DrinkWise developed consumer information messages for voluntary inclusion on alcohol labels to allow Australian consumers to better understand the facts around alcohol consumption.
- Pregnancy health information labels indicating "It's safest not to drink whilst pregnant" and an accompanying pregnancy pictogram – were taken up by industry as key message on labels (at the request of Government).
- The adoption of consumer information messages on product and packaging is voluntary and represents a significant commitment by industry.

#### ***Retail Drinks Australia***

Since 1983, Retail Drinks Australia (formerly, Australian Liquor Stores Association) has been the consistent voice of the national retail liquor industry, and is a united body, representing all off-licence retail liquor stores across Australia.

RDA has a demonstrated commitment to the responsible supply and promotion of alcohol beverage products. Some of the self-regulatory initiatives of RDA and its members have included:

#### ID-25

ID-25 is a program to educate customers, dissuade attempted purchase by minors and to reinforce staff awareness and confidence to refuse service to minors with point-of-sale material. Under this program, if a customer looks under the age of 25, staff members are encouraged to ask to see proof of age ID prior to selling alcohol to that customer, under an inoffensive promotional line "if you look under 25, take it as a compliment, as we will ask for ID".

#### Don't Buy it For Them

Don't Buy It For Them is a program designed to discourage secondary supply and to educate the community on their shared responsibility not to supply to under age and highlights the penalties for doing so. It also reinforces staff awareness and confidence to refuse service when in doubt, with back-up point-of-sale material.

#### Retail Drinks Online Code of Conduct

The Retail Drinks Online Code is an industry-wide framework launched in 2019 and was developed in collaboration with government and community to enhance compliance in the responsible online sale and delivery of alcohol.