

House of Lords Inquiry: *A new EU Alcohol Strategy?*

In 2006 the EU adopted its own Alcohol Strategy aimed at reducing alcohol-related harm. This expired in 2012. The House of Lords European Union Committee has considered whether there should be a new EU strategy. The AHA and several member organisations submitted responses to this inquiry. In particular the report was critical of the UK government's decision not to introduce a minimum unit price for alcohol to which it was committed, as well as representatives of the alcohol industry who were quick to criticise evidence contrary to their interests. The committee reached three main conclusions:

- The 2006-12 strategy, while well-intentioned, did not concentrate on what the EU itself can act on. Consequently it achieved little. In developing any new action the EU should concentrate on what it can do, over and above any initiatives the Member States can take on their own. The EU should ensure that its own policies contribute to the reduction of alcohol-related harm and excessive drinking.
- The current EU alcohol taxation regime prevents Member States from raising duties on the most harmful substances, and provides incentives to purchase drinks with higher alcohol contents. This illogical taxation structure must be reformed.
- The EU rules of food labelling must be amended to include alcoholic drinks. These labels should include, as a minimum, the strength, the calorie content, guidelines on safe drinking levels, and a warning about the dangers of drinking when pregnant. Voluntary commitments are not enough.

Conclusions and recommendations

The case for continued EU action

- Action is worth formulating at EU level only to the extent that it supplements and supports what Member States can do independently.
- Although the recommendations made to Member States by the WHO Global Strategy and European Action Plan are not legally binding, EU action should not conflict with these recommendations.
- The committee found that there was little need for Member States to agree on a new EU Strategy which is simply a continuation of the previous one.

Possible Policy Approaches

- Any future EU action on alcohol abuse should state realistic, clearly defined and measurable objectives, and include an evaluation mechanism to assess its progress and added value.
- Future EU action on alcohol abuse should not be confined to action under health policy, but should take a 'health in all policies' approach reflected through EU policies on related areas such as food labelling, cross-border marketing and taxation.
- The most effective policy approach is one which combines measures at population level intended to reduce overall levels of consumption, with targeted measures intended to reduce harmful consumption.

Taxation

- EU rules on the structure of alcohol taxation should be reviewed to allow the implementation of variable tax rates for wines and ciders in line with alcoholic strength, and to give an incentive to the manufacture of lower strength beers.
- The UK government should review the formula laid down by the Licensing Act 2003 (Mandatory Conditions) Order 2014 for calculating the minimum permitted price of alcoholic drinks and encourages other EU Member States to do the same.

Minimum Unit Pricing

- If minimum unit pricing is ruled as lawful under EU law, the UK government should monitor the effects of its introduction in Scotland. If MUP does appear to be successful in bringing health benefits to the heaviest drinkers, the government should implement the MUP in England and Wales.

Marketing

- The UK government, in addition to any scrutiny which it undertakes of the adequacy of self-regulation of alcohol advertising, should encourage the European Commission to reconsider the undertakings it gave nine years ago to work to prevent irresponsible marketing of alcoholic beverages, and to monitor the impact of self-regulatory codes.
- The UK government should press the European Commission to propose amendments to the Food Labelling Regulation. These should make it mandatory for labelling on alcoholic beverages to include information on the strength, the ingredients, nutrition, and the dangers of drinking during pregnancy.
- The European Commission should propose such amendments, and that thereafter the government should support their rapid enactment.

Bodies that support action at EU level

- The European Commission should review the structure and functioning of the Committee on National Alcohol Policy and Action (CNAPA) in order to ensure that it is fully capable of carrying out its coordination function. In particular, it should encourage Member States to nominate officials who are in a position to represent their governments' views.
- The European Commission should restate the remit of the European Alcohol and Health Forum (EAHF) and review its structure and functioning. The terms of reference of the Forum should clearly state the roles and responsibilities of all participating stakeholders, including the alcohol industry.
- The Science Group should be re-instated and be independent from the European Alcohol and Health Forum (EAHF) and include experts from all Member States. The Science Group should receive adequate support as well as sufficient financial resources from the Commission.

- EU action on alcohol should continue to be supported by bodies facilitating the exchange of expertise and best practices, which is seen by many as the key benefit of the EU Alcohol Strategy 2006–12.
- The roles and mandates of CNAPA, the EAHF and the Science Group should be formalised and reviewed periodically. In each case the role should include a clear work plan in line with the stated objective of any future EU action on alcohol abuse, as well as an explanation of the relationships between bodies and the Commission, which should be agreed by the Council.

Research

- Those responsible for formulating policy are best placed to commission research should they identify a need for further information.
- The quality of research should be questioned if it is carried out by researchers who are perceived to have vested interests in the outcome. The best way to diminish any such perception is to commission research from as wide and varied a network of researchers as possible. This should be done through competitive tendering.
- It should be no part of the researchers' task to suggest what policies should be based on their findings. Any attempt to do so will give rise to the perception of a lack of independence.
- Behavioural change, the impact of advertising on consumption by children and young people, harm to others and alcohol-related crime are some of the many areas where there are gaps in knowledge and where further research would significantly assist policy formulation.
- The Science Group could play a useful part in identifying gaps in the knowledge surrounding alcohol-related harm, and suggesting the parameters for research. It could also promote standardised terminology and common measurement standards to improve the comparability of research across the EU.

A new EU Alcohol Strategy

- A new Strategy which goes no further than its predecessor would achieve little.
- The structure of the taxation of alcohol and the labelling of alcoholic beverages are areas where the EU must exercise its competence to enact necessary legislation. It will be for the European Commission to take the initiative.
- The self-regulation of advertising, the organisation and powers of CNAPA, the EAHF and its Science Group, and research, are among the areas where the European Commission should work with Member States to improve the position, in accordance with recommendations from the House of Lord Inquiry.
- The EU Alcohol Strategy 2006–12 took the form of a Communication from the Commission to the Council. A similar Communication, whatever its title, which embodies the European Commission's determination to make these changes, and which is approved by the Council, would make a significant contribution to reducing alcohol-related harm in the EU.
- The Latvian Presidency intends to discuss the next steps towards a new EU Alcohol Strategy at an informal Council on 20–21 April 2015.