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CEPS comments on point 4 of the draft agenda

4.1 – Public health purpose of alcohol policy

We can agree with the Babor definition of the public health purpose of alcohol policy. In adopting this definition we note that alcohol policy is designed to promote ‘social well being’ as well as public health. It will be important to understand the term ‘social well being’ in this context and how alcohol can affect it. As such it will be essential that the report includes a proper analysis of the social benefits of responsible alcohol consumption as well as the social costs of irresponsible consumption.

4.2 – Terminology

Similar comment to above. We can not rely entirely on the ICD 10 which cover only mental and behavioural disorders. The invitation to tender for the report requires a specific section on healthy/moderate consumption which will obviously also need to be clearly defined.

4.3 – Economic cost

CEPS has a number of concerns most notably:

- Economic cost can not be highlighted without a comparison to economic benefits
- It will be extremely misleading to include a measure of external costs (pain) without including external benefit (social networks, social capital etc)

The report must therefore be extremely up front about the inadequacies of its attempt to measure economic cost.

4.4 – Consumption

European figures are misleading in that they disguise widely divergent patterns at the national level. National breakdowns will therefore be more revealing. Any description of consumption must highlight drinking patterns as opposed to total consumption. The issue the report needs to address is irresponsible consumption as opposed to consumption per se.

4.5 – Young people

We found the Australian Ministerial Council conclusions to be contradictory. They target parents as the main determinant of young people’s drinking but then conclude that the best

strategy to address young people's drinking is a whole population strategy to address overall levels of use.

If parents are the target, the best strategy is a targeted approach towards parents to educate and lead by example by condemning irresponsible use.

As the contractor made clear Australia has not yet drawn up any specific policy recommendations as a result of this review. It might be useful to wait and see if Australia actually acts on these conclusions before deciding whether or not they are a useful reference point.

4.6, 4.7 and 4.8 – Individual harm, DALYs and a population's level of drinking

The Amsterdam Group technical expert made very clear that different scientists can interpret the same data in different ways or that for every piece of data presented, other studies had come to different conclusions. The lack of consensus around the science and lack of reliability of the data being presented must be highlighted in the report.

4.9 – Violence

The conclusion that alcohol attributed violence is a bigger problem in Southern Europe than in Northern Europe seems misleading and highlights the point made above that different scientists can interpret data in different ways. The figures presented actually reveal that, despite a higher level of alcohol consumption per capita, there are significantly less homicides per capita in Southern and Central Europe than in Northern Europe.

CEPS agrees that server training programmes and better enforcement of legislation controlling the retail sector will be effective in reducing violence (as well as other concerns around alcohol, most notably under age drinking).

4.10 – School based education

The Amsterdam Group technical expert made clear that some (more recent) school based education does work. It depends on the approach. If one thing is going to make young people drink, it's their teachers and/or parents telling them not to. Education campaigns need to concentrate on the social norming approach, recent examples of which, appear to be producing positive results.

It is important that the report covers all education campaigns and not just school based ones.

4.12 – Different policy options

CEPS very much hopes that this section will indeed analyse a menu of policy options and their different impact in different countries and not concentrate exclusively on promoting taxation.

With respect to taxation, the meeting made abundantly clear that the contractor's analysis of the effectiveness of taxation policy, was simplistic and failed to take into account issues such as illegal consumption, smuggling, price elasticity etc.

It is surely instructive that the EU countries with the highest levels of taxation are precisely those countries where irresponsible consumption of alcohol, most notably binge drinking, is most prevalent.

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