

Comments to Proposal for a regulation - COM(2018)392/977262
Multiannual Financial Framework - CAP Strategic Plans



August 2018



The European Alcohol Policy Alliance (EUROCARE)

The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governmental and public health organisations with around 55-member organisations across 23 European countries advocating for the prevention and reduction of alcohol-related harm in Europe. Member organisations are involved in advocacy and research, as well as the provision of information and training on alcohol issues and services for people whose lives are affected by alcohol problems.

The mission of Eurocare is to promote policies to prevent and reduce alcohol-related harm. Our message, in regards to alcohol consumption, is “less is better”.

Eurocare’s contribution to Comments to Proposal for Regulation – COM (2018)392/977262- Multiannual Financial Framework - CAP Strategic Plans

The European Alcohol Policy Alliance (Eurocare) welcomes that the Proposal recognises the link between consumption and public health.

However, Eurocare would like to highlight that the Proposal should **better reinforce the link to health policy, especially with regards to alcohol consumption – namely ending with promotion of wine.**

- ◆ Promotional funds for wine are a form of alcohol marketing and should not be financed by the CAP Strategic Plans.
- ◆ Responsible drinking messages are ineffective and part of companies CSRs.
- ◆ Alcohol can be linked to health and social problems which create a hindrance to development.

The continuous support for promotion schemes in the wine sector are the hindering European Union’s efforts to meet the UN’s Sustainable Development Goals (SDGs) and policy coherence with other EU objectives (e.g. 2006 *European Union strategy to support Member States in reducing alcohol related harm* and Art 208 TFEU).

Wine and other alcoholic beverages are the third leading global risk for the burden of disease¹. Globally, harmful use of alcohol causes approximately 3.3 million deaths every year (or 5.9% of all deaths), and 5.1% of the global burden of disease is attributable to alcohol consumption. According to the World Health Organization (WHO), a causal relationship exists between alcohol consumption and more than 200 health conditions, including new data on causal relationships between the harmful use of alcohol and the incidence and clinical outcomes of infectious diseases such as tuberculosis, HIV/AIDS and pneumonia. Considering that beyond health consequences, the harmful use of alcohol inflicts significant social and economic losses on individuals and society at large, the harmful use of alcohol continues to be a factor that has to be addressed to ensure sustained social and economic development.

Alcoholic beverages, including wine, are an addictive substance and should not be promoted through European funds; hence Articles: 51 (g), 52 (g) and (h) should be deleted.

¹ WHO, Health Risks 2009; as retrieved from:
http://www.who.int/healthinfo/global_burden_disease/global_health_risks/en/

Promotional funds for wine are a form of alcohol marketing and should not be financed by the CAP Strategic Plans

The following promotional activities are eligible for support: (a) Public relations, promotion or advertisement measures; (b) participation at events, fairs or exhibitions of international importance; (c) information campaigns; (d) studies of new markets, necessary for the expansion of market outlets; (c) studies to evaluate the results of the information and promotion measures.



This unprecedented EU-funding and propping up of advertisements for a single product, which is classified as a class one carcinogen², creates a gross dissonance with the CAP's notion of providing a stable supply of "safe food". As recognised by the European Commission itself, alcohol related harm is a major public health concern in the EU, accountable for over 7% of all ill health and early deaths³.

Member States of the European Union have endorsed the World Health Organization's *Global strategy to reduce harmful use of alcohol* as well as the World Health Organization's *European action plan to reduce the harmful use of alcohol 2012–2020*, which both encompass measures that limit marketing of alcohol. As such, promotion of any form of alcohol drinking (including responsible drinking) is contradictory to the motion of protection of health of European citizens.

Moreover, the Sustainable Development Goal 3, Goal 3. Target 3.5, with which the European Union has an obligation to comply, calls for strengthening of the prevention efforts in the area of alcohol related harm.

While wine promotion funds are used for marketing, the World Health Organization is calling on marketing restrictions for alcoholic beverages to tackle the burden of non-communicable diseases⁴.

Furthermore, the 2014 European Court of Auditors has already questioned the role of EU grants for the promotion of wines.

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² IARC, Monograph, 2010, Vol 96 <https://monographs.iarc.fr/wp-content/uploads/2018/06/mono96.pdf>

³ European Commission, 2018. https://ec.europa.eu/health/alcohol/policy_en. Retrieved 21 February 2018.


⁴ World Health Organization, 2017 *"Best buys" and other recommended interventions for the prevention and control of noncommunicable diseases*

Marketing of wine

Exposure to alcohol advertising increases the likelihood that young people start drinking at an earlier age, and to drink more if they already consume alcohol⁵.

Despite being a key health determinant, alcohol is still heavily marketed to young people as an important target group. In 2009, the Science Group of the European Alcohol and Health Forum reviewed evidence⁶. They looked at the impact of marketing on the volume and patterns of drinking alcohol. It concluded that alcohol marketing increases the likelihood that young people will start to drink alcohol and that if they are already drinking, they will drink more in terms of amount and frequency. According to the WHO's European Charter on Alcohol 1995, "All children and adolescents have the right to grow up in an environment protected from the negative consequences of alcohol consumption and, to the extent possible, from the promotion of alcoholic beverages". Reducing exposure to alcohol marketing by young people should be a key objective.

Worryingly, the wine industry's promotional activities heavily rely on marketing through social media that does not differentiate between youth and adult users. Consequently, children and young people below legal drinking age can be exposed to messages that encourage them to drink European wine. The earlier youth start drinking, the worse are the long-term health consequences.⁷



For instance, a recent case involving a Spanish-French collaboration of wine producers from the Iberian border region has an ongoing EU-funded promotional campaign in Canada and the US that specifically targets "millennials" and has reached more than 8 million people through their PR work, of which more than 3 million are on social media (where young people below the legal drinking age are present in large numbers).

Alcohol ads on social media can spread quickly once online, stopping the ads is almost impossible.

Taking into account the general advertising shift towards digital and social media, where age is more difficult to verify and exposure of children to alcohol advertising is difficult, the EU should not allow public money to be spent on these channels to promote wine.

⁵ AMPHORA project; Anderson et al. (2009) *Impact of alcohol advertising and media exposure on adolescents' alcohol use: a systematic review of longitudinal studies*. *Alcohol* 44(3), 229-243

Smith and Foxcroft (2009) *The effect of alcohol advertising, marketing and portrayal on drinking behaviour in young peoples: systematic review of perspective cohort studies*. *BMC Public Health*, 9, 51.

⁶ Science Group of the Alcohol and Health Forum (2009) *Does marketing communication impact on the volume and patterns of consumption of alcoholic beverages, especially by young people?* As retrieved from:

https://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf

⁷ *Journal of Epidemiology and Community Health*, 2013. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4158030/>.

Retrieved 12 February 2018.

Responsible drinking messages are ineffective and part of companies CSRs

Within the framework of the National Support Programmes, wine companies or consortia may receive funding for promoting “responsible drinking” within the EU. The wine industry is not well placed for these types of educational campaigns. They are not legitimate stakeholders and may send mixed messages about alcohol consumption, considering their biased commercial interests in increasing wine sales.

“Responsible drinking” messaging (e.g. “Drink [product] Responsibly”) which frequently appears on product labels and adverts is a central element of corporate social responsibility (CSR) activities. It is a strategically ambiguous, industry-affiliated term allowing multiple interpretations. Industry sources rarely reference government drinking guidelines in the context of responsible drinking, instead stressing individual responsibility and risk management to protect industry interests at the expense of public health⁸.

Some studies point out that young people shown ‘responsible drinking’ messages viewed them as glamorising alcohol consumption among young adults, and as being similar to marketing⁹.

Furthermore, it is well documented that ‘responsible drinking’ messaging is used as part of the CSR to shift the policy debate attention from those who manufacture and promote the products to those who consume them¹⁰.

Evidence indicates that framing of alcohol consumption as a matter for individual decision-making has powerful implications within policy making: (i) leading to positive views of that industry as taking responsibility for reducing any potential harms associated with the product; (ii) pre-empting and thus avoiding government regulation. This framing lies in a direct conflict with public health conceptualization of harmful drinking, and with the scientific evidence-base on how it may be reduced.¹¹

‘Responsible drinking’ campaigns serve interest of wine producers and feed into companies CSR activities, tax payers’ money in form of CAP subsidies should not be spent on them.

CAP Strategic Plans should not include a possibility to finance promotion campaigns for wine, especially ‘responsible drinking’ funding should be stopped.

“Responsible drinking” is a strategically ambiguous, industry-affiliated term allowing multiple interpretations.

CAP Strategic Plans should delete Art 51 (g) and Art 52 (g).

⁸ Savell E, Fooks G, Gilmore A.B (2015) *How does the alcohol industry define “responsible drinking”? A qualitative analysis* Addiction. doi:10.1111/add.13048

⁹ Smith SW, Atkin CK, Roznowski J. (2006) *Are “drink responsibly” alcohol campaigns strategically ambiguous?* Health Commun; 20:1–11.

¹⁰ Yoon S, Lam T-H. (2013) *The illusion of righteousness: corporate social responsibility practices of the alcohol industry.* BMC Public Health;13:630.

Mialon M, McCambridge J (2018) *Alcohol industry corporate social responsibility initiatives and harmful drinking: a systematic review* European Journal of Public Health, Vol. 28, No. 4, 664–673

¹¹ Mialon M, McCambridge J (2018) *Alcohol industry corporate social responsibility initiatives and harmful drinking: a systematic review* European Journal of Public Health, Vol. 28, No. 4, 664–673

Alcohol as a hindrance to development

Alcohol can be linked to health and social problems which create a hindrance to development.

For the EU to be promoting wine marketing campaigns in third countries outside the EU (including many of the developing countries) is unethical and can be in direct opposition to its commitments to the SDGs and Art 208 TFEU.



Alcohol's well-known role in the liver cirrhosis is probably even more important in developing countries than in developed, because of the high prevalence of various forms of hepatitis and other infections that can interact with drinking in affecting the gastro-intestinal system. The potential role of alcohol in HIV and AIDS is of obvious importance in developing societies in Africa and elsewhere. Drinking is also a major source of social problems in many developing countries, including assaults and homicides. Well-known somatic effects of prolonged high intake are accentuated by the conditions of living in developing societies. For example, malnutrition resulting from poverty aggravates vulnerability to ill health among drinkers. Alcohol consumption may worsen the impact of the infectious diseases characteristic of developing societies. Damaging effects on the liver from forms of infectious hepatitis and from alcohol are likely to be synergistic. Some acute medical effects of heavy drinking are more prominent in developing societies (e.g., fatal delirium tremens, fata alcohol poisoning).¹²

Alcohol producers use marketing as a dynamic driver of change in customs and amounts of drinking. However, in developing societies the impact of drinking on the family budget and wellbeing is more prominent.

Unfortunately, at the same time resources and policy focus to mitigate the negative impacts remain scarce. The EU should not be adding to that burden by supporting wine promotion funds which are effectively serving as marketing tools for European wine producers.

As pointed out by the World Health Assembly in 2005 there is a need for a greater policy coherence internationally *"trade and health policy so that international trade and trade rules maximize health benefits and minimize health risks, especially for poor and vulnerable populations"*.

The EU's promotional funds for marketing in third countries run in opposition to such policy coherence.

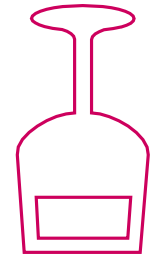
For the EU to be promoting wine marketing campaigns in third countries outside the EU (including many of the developing countries) is unethical and can be in direct opposition to its commitments to the SDGs and Art 208 TFEU.

CAP Strategic Plans should delete Art 52 (h).

¹² World Health Organization (2002) Alcohol in developing societies: a public health approach.

Final remarks

There is no justification for the special treatment of the wine industry. The EU should seize the opportunity and end with the 'special case' 'specificity' of the wine sector. In the current political climate, the EU should set an example of anti-protectionism and not provide further protection for one interest group (wine producers).



To conclude, health is a public interest worthy of consideration in development and implementation of all policies. To work towards achieving that objective, the current proposal should delete the possibility of promoting wine through CAP.

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