

ALCOHOL POLICY NETWORK (APN) GUIDANCE ON THE ALCOHOL INDUSTRY AND ALCOHOL POLICY

INTRODUCTION

The Alcohol Policy Network (APN) is a group of persons working in governmental and in non-governmental organizations with an interest in developing and promoting alcohol policies and strategies that serve public health and social welfare. APN concerns about the role of the alcohol industry in alcohol policy led to a number of principles on the subject being agreed upon at a meeting of the network in Ljubljana in 2016. These principles were then laid down in a text, which is available at the website of APN (www.alcoholpolicynetwork.eu). The current paper builds on these principles in outlining the essential information and arguments for APN's guidance.

BACKGROUND

The WHO Global Burden of Disease Studies carried out over the last 25 years have shown very significant and growing public health problems associated with alcohol consumption across the world. Evidence also points to the fact that a variety of policies and strategies can effectively reduce the harm associated with alcohol consumption.

While there are some strategies which can reduce alcohol related harm without influencing the amount of alcohol consumed, generally speaking, the less alcohol is drunk in a population the less harm will occur. For public health advocates, therefore, when it comes to alcohol - less is better. The alcohol industry, with a "bottom-line" interest in advancing its commercial interests has an opposite overall goal. For them more is better. To this end they want to be involved in alcohol policy making; and, in fact in many countries and in international agencies the industry currently does play an active role in the policy making process.

By 'the industry' we refer here primarily to economic operators who have commercial interests in the supply chain from production to sale of alcohol. There are also related corporate sectors such as advertising, media, hospitality and retail who share commercial interests with the actors in the supply chain. Our definition of the alcohol industry further includes trade associations, social aspects organisations, and other actors who seek to further the economic objectives of individual companies or the commercial interests of the industry as a whole.

Concerned about the continuing influence of the alcohol industry on public health policy, APN identifies the following guiding principles for policy maker consideration.

1. Alcohol policy is first and foremost a public health policy

As the aim of alcohol policies is to protect public health and welfare, it needs to be formulated by public health experts and be informed by the best available scientific evidence. This process should not be influenced, or even perceived to be influenced, by interest groups that have a commercial or other vested interest in the products being regulated. This position is widely respected across other areas of policy making related to potentially hazardous substances; for example in relation to tobacco.

2. Conflicts of interest must be controlled

Trust underpins all public health authority. The credibility and reputation of public health authorities depends on their conscientious and consistent pursuit of promoting the interests of public health and social welfare. Public perception of policy making is easily tainted when conflicts of interest are not transparently and rigorously controlled.

3. Commercial interests of the industry inevitably conflict with health objectives

The commercial interests of alcohol industry actors are generally served best by increasing alcohol sales, and consequently, consumption in any population. The evidence is clear and unambiguous, that increases in alcohol consumption are accompanied by increases in a wide range of health and safety harms. The “more is better” interests of the alcohol industry and “the less is better” interests of public health thus simply run directly counter to each other.

4. Independent public health scientific research on reducing alcohol harm should guide all policy development

Scientific research on the scale and nature of the burden of alcohol, and how policies may reduce levels of alcohol-related harms, is foundational for informing alcohol policy development. Scientific findings which show the harms produced by alcohol consumption, and how they may be reduced, may be contrary to the interests of industry actors. While public funding for scientific research is increasingly under pressure, the industry increasingly deploys resources to sponsor research programs or to recruit researchers. Across industries evidence demonstrates that such funding influences the direction and the content of scientific research. In principle the funding for evaluation studies and the broader scientific foundations of public health policy making needs to be from independent public sources so as to avoid any industry influence.

5. Civil society advocacy and partnership is crucial

Public health advocacy by civil society organisations performs vital functions in support of alcohol policy development. This work represents the interests of those who are harmed by alcohol, and the interests of the public as a whole. Policy makers need strong partnerships with public health advocacy organisations as a resource to complement to work with scientific organisations.

6. Monitoring and surveillance of the alcohol market is needed

The functioning of the alcohol market has a great impact on the overall level and patterning of harmful drinking within a society. For example, the pricing decisions of alcohol companies can segment markets in ways which exacerbate health inequalities. Concentrating retail outlets in areas of socioeconomic deprivation, or developing brands that appeal to children and young people will have important public health implications.

Thus the monitoring and surveillance of the alcohol market is an essential component for the guidance of alcohol policy development. Alcohol industry actors possess extensive data on the alcohol market which is, however rarely made available to inform public policy development. Sharing such data could be interpreted as providing evidence that industry actors are genuinely prepared to contribute to reducing the harmful use of alcohol.

7. Self-regulation doesn't work

Whilst being well aware of the risks of their product, industry actors - in the face also of growing pressure to reduce risks - prefer to operate without external constraints and claim that any sort of desirable control, is best achieved through industry steered self-regulation, instead of control from

public authorities. To date there is however no convincing evidence available to suggest that industry self-regulation effectively reduces alcohol-related harm. In fact, the evidence indicates that controlling prices, physical availability, and marketing by public authorities are the most effective strategies.

8. Alcohol corporate social responsibility needs to serve the interests of society, not influence policies

Corporate social responsibility (CSR) programmes may be designed to reflect a corporation's sense of its responsibilities to society and should serve the public good. Alcohol industry supported CSR programmes and institutions (such as so called Social Aspects Organizations or the International Alliance for Responsible Drinking) claim to serve public health and welfare. Typical examples of alcohol industry supported CSR activities include educational campaigns, assistance in preventing public nuisance associated with drinking and the like. Existing evaluations suggest that such initiatives are too often not evidence-informed, and do not reduce significantly alcohol-related harms but instead support corporate political strategies. CSR activities can never substitute national alcohol policies.

9. The alcohol industry could play a positive role in controlling harm

Industry could make important contributions to reducing alcohol related harm by for example the provision of objective consumer information, comprehensive labelling, abstaining from marketing efforts and from sales promotion in particular at sports and cultural events, reducing the alcohol content of beverages, and by assisting observance of underage drinking and drink-driving regulations. None of these contributions however require nor should they include involvement in the alcohol policy making process. Where communications with the industry with regard to such possible contributions are needed, these are not to be confused with involvement in the policy making itself.

CLOSING REMARKS

Taking the above into account APN's guidance regarding the role of the industry in alcohol policy making is that if such a policy is meant to serve public health and social welfare, it is not appropriate for the industry to be involved in the design of the policy. Where the industry is nonetheless involved it is very important that conflicts of interests are transparently managed. This does not preclude communication with the industry whereby the industry may be encouraged to utilize their specific opportunities for reducing alcohol related harm, and assist in increasing insight into the market for alcoholic beverages.