

**EUROCARE RESPONSE TO  
REVISED DRAFT GLOBAL ACTION PLAN FOR THE PREVENTION AND CONTROL OF  
NONCOMMUNICABLE DISEASES 2013 – 2020  
(version dated 11 February 2013)  
DURING SECOND INFORMAL CONSULTATION**



March 2013

**The European Alcohol Policy Alliance (EUROCARE)**

EUROCARE (The European Alcohol Policy Alliance) is an alliance of non-governmental and public health organisations with around 55 member organisations across 24 European countries advocating the prevention and reduction of alcohol related harm in Europe.



EUROCARE strongly supports World Health Organisation's (WHO) efforts to tackle the global threat to health due to Noncommunicable diseases (NCDs). Eurocare has welcomed the opportunity to participate in the consultation process in the course of last year through submission of its opinions to the:

- *Second WHO consultation on monitoring framework and target for the prevention and control of NCDs* (April 2012)
- *WHO consultation on Global Action Plan for the prevention and control of NCDs 2012-2020* (September 2012)
- *WHO Third discussion paper on NCDs Monitoring Framework* (October 2012)

In response to the *Revised Draft Global Action Plan for the prevention and control of noncommunicable diseases 2013 – 2020* (version dated 11 February 2013) during second informal consultation, Eurocare appreciates and welcomes WHO for ensuring the following:

- ■ 10% reduction in overall alcohol per capita consumption among persons aged 15+ being one of the key targets in the monitoring framework
- ■ Inclusion of regulation of marketing of alcoholic beverages, pricing policies and restricted availability as recommended target areas in the NCD Action Plan.
- ■ *The WHO Global strategy to reduce the harmful use of alcohol* and its target areas as the principal point of reference for Member States in order to tackle alcohol related harm through cost effective interventions

There is strong epidemiological evidence to suggest a reduction in per capita alcohol consumption will reduce levels of health and social harm caused by alcohol in a population<sup>i</sup>

We are pleased to observe that the global target for alcohol is suggested as at least 10% relative reduction in the harmful use of alcohol, as appropriate, within the national context.

Eurocare is delighted to observe that NCD Global Action Plan has included the WHO Best Buys set of well established, effective and cost effective public health interventions for alcohol policy. Eurocare strongly believes that we should build on this knowledge. All these interventions could be included as sub-indicators under the per capita consumption or put forward as recommended measures, they include among others:

Degree of evidence	Evidence of action that reduces alcohol related harm
Convincing	Alcohol taxes
	government monopolies for retail sale
	restrictions on outlet density
	restrictions on day and hours of sale
	minimum purchase age
	lower legal BAC levels for driving
	random breath testing
Probable	brief advice programmes
	minimum price per gram of alcohol
	restrictions on the volume of commercial communications
	enforcement of restrictions of sales to intoxicated and under-age people

Eurocare would like to suggest the following issues to be included in the Draft Action Plan:

-  Increased reporting frequencies
-  Inclusion of Comprehensive Labelling of alcoholic beverages
-  Conflict of Interest

It is crucial to appropriately monitor NCD policy developments, with a set of common indicators and definitions, in order to ensure that regular and comparable data are available.

Eurocare would like to stress the need to include comprehensive labelling of alcoholic beverages as one of the tools to inform and educate consumers. Product labels can serve a number of purposes, providing information about the product to the consumer, enticing the consumer to buy the product and warning consumers of dangers and health risks from the product.

Listing the ingredients contained in a particular beverage alerts the consumer to the presence of any potentially harmful or problematic substances. Even more importantly, providing the nutritional information such as calorie content allows consumer to monitor their diets better and makes it easier to keep a healthy lifestyle. Unfortunately, today only allergens are required to be listed compulsorily.

Eurocare believes that alcohol producers should provide information not only on ingredients, but also about the risks associated with alcohol consumption: damages to health (liver cirrhosis, cancers)



risk of dependence, dangers associated with drinking alcohol during pregnancy, when driving, operating machinery and when taking certain medication. These messages would be, at a low cost to public budgets, easy to implement and an important reminder that alcohol is a hazardous product.

## RECOMMENDATIONS

Introduction of health warning labels on containers of alcoholic beverages determined by state/public bodies.

Containers of alcoholic products should be required to provide the following information about the product to consumers:

- their ingredients
- substances with allergenic effect
- relevant nutrition information (energy value kcal)
- alcoholic strength
- include health warnings

Eurocare has developed a set of alcohol health warning labels that are attached and could prove to be a useful starting point for WHO and Member States.

Last but not least, we would like to stress our concern over the inclusion of economic operators in public health policy-making. Eurocare would suggest under § 11 a sentence around Conflict of interest especially relating to alcohol and tobacco industries. Additionally, we would like to encourage WHO to develop a Code of Conduct and Ethical Framework to protect the integrity and transparency of policy making.

### FOR MORE INFORMATION PLEASE CONTACT:

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<sup>i</sup> Anderson, P., Chisholm, D., Fuhr, D.C. (2009) Effectiveness and cost-effectiveness of policies and programmes to reduce the harm caused by alcohol. *Lancet*, 373: 2234–46.