

**Online open written consultation on the European Programme of Work
World Health Organization Europe**



July 2020



[The European Alcohol Policy Alliance \(EUROCARE\)](#) is an alliance of non-governmental and public health organisations with 52 member organisations across 22 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in advocacy and research, as well as in the provision of information and training on alcohol issues and the service for people whose lives are affected by alcohol problems.

The mission of Eurocare is to promote policies to prevent and reduce alcohol related harm. The message, regarding alcohol consumption is “[less is better](#)”.

Eurocare is registered in the European Transparency Register under number: 01546986656-22.

[Introductory remarks](#)

Eurocare and its members welcomes the online written consultation on the WHO European Work Program. The COVID-19 pandemic has shown the need to significantly boost Europe’s preparedness and capability to respond effectively to major cross border health threats. It has also shown the need for prevention as people with additional problems related to non-communicable diseases has been worse hit.

Given Eurocare’s profile, comments will be given to areas in which it possesses expertise, mainly prevention of alcohol related harm.

Europe is the heaviest drinking region in the world with 9.8 litres of pure alcohol per person (15 + years), well-above the global average of 6.4 litres. Drinking alcohol is associated with a risk of developing more than 200 different types of diseases¹. Every day in EU+ countries around 800 people die from alcohol attributable causes (291.000 per year).² The main cause of death due to alcohol in 2016 was cancer (29% of alcohol-attributable deaths)³.

Eurocare warmly supports the opportunities WHO has given for Non State Actors’ s(NSA) to contribute to the EPW and its flagship initiatives by providing suggestions on its implementation, after the adoption of the EPW by the Member States at the Regional Committee in September 2020. We are delighted to provide our suggestions on how to work together in practical terms on these topics. Non-State actors such as National and European umbrella organisations are serving as grassroots organisations by collecting their voices and representing them to national level decision makers but also to regional organisations such as the European Union, the Organisation for Economic Cooperation and Development or WHO Europe.

Eurocare does not find it appropriate that the WHO consults and has meetings with economic operators like the alcohol producers when health policy and strategies are being discussed. If these meetings take place, they should be open and transparent, with Member State and civil society organisations present.

[Suggested new, additional Flagship initiative 5 – Tackling the Non-Communicable Disease epidemic](#)

¹ WHO (2018), Global status report on alcohol and health

² WHO Europe (2019), Status report on alcohol consumption, harm and policy responses in 30 European countries 2019; results of joint WHO-EU project MOPAC

³ *Ibid.*

Eurocare warmly supports EPHA's suggestions of an additional Flagship initiative – Tackling the Non-Communicable Disease epidemic.

Eurocare would strongly advocate that given the burden alcohol places on people's health and its role as a risk factor for poor health and cancer, WHO should consider having a special strand for work on alcohol and be ambitious in its actions.

There are several areas where divergences exist in Member States not only with regards to the level of knowledge regarding harms caused by alcohol (such as contributory factor for cancer or pandemics) but also in terms of policies, especially in relation to WHO 3 Best Buys (i.e. commercial communication policies, especially with regards to digital advertising)

WHO should show leadership that would consequently also empower Member States to address alcohol related harm and its contribution towards better health for the population.

Eurocare acknowledges and understands cultural differences in attitudes towards alcohol consumption in the region. However, when it comes to prevention cultural viewpoints cannot get in a way of such basic actions as informing people about alcohol being a risk factor for ill health, including cancer and introduction of measures that would help to reduce its burden.

Concrete proposals for actions

- Health promotion and prevention should be given a high priority in the new work program.
- Eurocare gives its full support for the need to focus on inequalities within and between Member states
- Eurocare is calling for better data collection and monitoring at EU level. There is an urgent need for better collection of data. Especially important in connection with the pandemic – did alcohol consumption go up or down, what happened to the harm to individuals, families – did it go up or down – if up what kind of harm -- injuries, accidents, cancer, liver diseases, families and children, mental health etc
- When a new policy is introduced at Member State or EU level, there is an urgent need for evaluation to investigate if the policy implemented fulfils its objective.
- The link between alcohol and cancer is unknown for many (even if almost 30% of cancers are attributable to alcohol). We are therefore calling for:
 - Allocation of funding for campaigns (either national or European) to increase awareness about the connection between alcohol and cancer.
 - Gathering information regarding citizens' knowledge about alcohol and cancer (the latest Eurobarometer asking that question is a decade old).
 - Gathering information regarding prevalence of alcohol-related cancers in the WHO Europe, and good practice examples from Member States on methods to increase awareness and reduce prevalence.

- Alcohol labels are not regulated to provide information on ingredient and nutritional listings nor the harm the product can cause the consumer.
 - Monitoring the voluntary implementation of ingredient and nutritional values as agreed by the alcohol producers in Europe is crucial.
 - Call for evaluation of the labels and how consumers understand them.
 - Prepare a library of health information labels as good practice examples for Member States
 - Regulate the labelling of health-related messages on containers of alcoholic beverages, (among others) informing consumers about the harms related to alcohol consumption.

- Commercial communication
 - There is an urgent need for better monitoring of the developments of alcohol marketing that not only deals with the content, but also the exposure of alcohol marketing to young people.
 - Especially the digital agenda – how are young people being influenced online?
 - Digital tools are a welcomed development of the recent years but Eurocare would like to point out that prevention efforts can be complemented by digital tools and not primarily dependent on them.
 - Access to digital tools relies heavily on the individual actively engaging with them, making a choice to be informed. This can result in increased disparities among EU’s citizens in terms of knowledge. Research in this area is needed.

- Cross border trade, excise duties and price are important issues regarding prevention of health. More knowledge on developments in Member States are needed.

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