



Web-based consultation on the implementation of the WHO global strategy to reduce the harmful use of alcohol and the way forward

Joint Submission from New Zealand Winegrowers, the Brewers Association of New Zealand and Spirits New Zealand

Introduction

NZ Winegrowers, the Brewers Association of NZ and Spirits NZ welcome the opportunity to participate in the WHO's online consultation on how to continue to reduce the harmful use of alcohol. As the three peak bodies representing the significant majority of importers, exporters, manufacturers and distributors of beverage alcohol we and our members are committed to working constructively with government and other community stakeholders to accelerate the reduction in harmful consumption we are observing in New Zealand – particularly with youth.

We believe there has been much progress towards the creation of a moderate, safe drinking culture globally and in New Zealand but acknowledge that there is much work still to be done to continue the improvements we observe.

Questions for Consideration

What, in your organisation's view, have been the most important achievements, challenges and setbacks in implementation of the WHO global strategy to reduce the harmful use of alcohol since 2010?

Response

1. The WHO consultation document notes significant global improvements in a number of areas such as heavy episodic drinking and in death and disability from harmful use of alcohol.
2. From a New Zealand perspective over the last decade there have also been significant improvements in a number of key areas including:
 - a. Proportion of 15 – 17 year olds who drink hazardously has fallen by 25%
 - b. Drink driving convictions have fallen by 50%.
 - c. Per capita alcohol consumption, measured by alcohol available for consumption, has fallen from 9.6 litres of pure alcohol per capita (15 years and older) in 2010 to 8.8 litres at the end of 2018.
 - d. 80% of New Zealanders drink moderately and responsibly.

3. In addition the New Zealand industry, through its social change charity *Cheers!* (www.cheers.org.nz) has implemented a number of wide-ranging programmes targeting at-risk consumers including pregnant women – through its ‘No Alcohol means No Risk’ activation (see <https://www.youtube.com/watch?v=dDRTImmKtzw>) – and 12/13 year old school children through the internationally acclaimed theatre-based education programme *Smashed* (see <https://cheers.org.nz/our-work/smashedproject/>).
4. *Smashed* aims to provision young people with the knowledge and the social fortitude to say ‘no’ or ‘no more’ to drinking. This year over 20,000 school children participated in the interactive in-school programme.
5. With specific reference to the WHO consultation document we would make comment on relevant challenges and setbacks:

- a. A continued focus on evidence-based interventions

At the core of this challenge is the need for proper data collection and measurement frameworks. We believe this means a continued focus on measuring harmful consumption and not merely reductions in per capita consumption. Reductions in per capita consumption do not reflect relevant changes in harmful consumption – particularly in mature markets therefore a focus on harmful drinking should be set as a standard measure. There is also, in this context, a need to continue to measure heavy episodic drinking, morbidity and mortality as it relates to harmful drinking.

In conversations with Health officials it has been indicated that a measure of per capita consumption is more easily achieved by some third world Member States. We do not accept this position and strongly recommend that the broader set of measures, as indicated, be used and that Member States are supported in their efforts to adopt more meaningful measures.

- b. Maintaining Industry Involvement.

We submit that better and more rapid outcomes are achieved when industry is represented in high level policy discussions on how to reduce the harm caused by excessive drinking. We note that this was supported in the High Level outcome document for the recent UN General Assembly on NCDs which recognised the role of industry as a potential partner for governments to tackle harm.

- c. Implementation of a range of policy options that can be adapted to national contexts.

We also support the development of a range of policy options, and the continued ability of Member States to select evidence-based interventions appropriate for their context and population’s needs. For example, taxation is a sovereign right and any attempt to require a certain form or level of taxation is inappropriate.

What, in your organisation's view, should be priority areas for future actions to reduce the harmful use of alcohol and strengthen implementation of the global strategy to reduce the harmful use of alcohol

Response

6. We would recommend the following as key points for GAS to focus on in the coming years:
 - a. Implement, as per the points noted above, a robust and meaningful measurement framework focusing on harmful consumption not just per capita consumption. With this context in mind we further recommend that the UN Political Declaration on NCDs become the central reference document for GAS.
 - b. Continue to improve the engagement with industry to improve agreed outcomes. Industry has information and insights into everything from consumer behaviour to consumption patterns that, in the context of reducing harmful consumption, are potentially powerful tools. Every effort should be made to encourage industry involvement through GAS.
 - c. Further to the above (but mentioned specifically here because of the concerns raised in the consultation document) we recommend industry's use and knowledge of social media and digital technologies are properly harnessed both as a channel for appropriate harm reduction messaging as well as to ensure social media (in particular) is used appropriately.
 - d. We would also bring to your attention that in 2014 the global companies who are members of the International Alliance for Responsible Drinking (IARD)¹ announced the first-ever set of global guidelines for beverage alcohol producers' online marketing and social media use. These Digital Guiding Principles ensure that the rapidly changing area of digital technology, when used for marketing, only reaches adults of legal drinking age.

Additional Comments

7. The Discussion Paper used as the background document for the purposes of the review of GAS contains some surprising descriptions of the beverage alcohol industry and its perceived role in reducing harmful consumption. The following statement from page 10 of the document best summarises this:

Increased awareness of the commercial determinants of health provides another opportunity to strengthen development and implementation of alcohol control measures by effective counteraction of the industry interference in the alcohol policy development.

8. Firstly, we are unaware as to the meaning of the phrase 'commercial determinants of health' and what it means in the context of GAS. Secondly the implication that industry involvement is interfering with [effective] policy development is both incorrect and unfortunate.
9. Our response to this is to refer again to the UN Political Declaration on NCDs that recommends that industry be involved in developments seeking to reduce harmful drinking.

¹ IARD is a not-for-profit organisation dedicated to reducing harmful drinking and promoting understanding of responsible drinking. Its members are the 11 global leaders in beer, wine and spirits production.