

**EUROCARE RESPONSE TO “GREEN PAPER ON PROMOTION MEASURES AND INFORMATION
PROVISION FOR AGRICULTURAL PRODUCTS”**



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The European Alcohol Policy Alliance (EUROCARE)

EUROCARE (The European Alcohol Policy Alliance) is an alliance of non-governmental and public health organisations with around 50 member organisations across 21 European countries advocating the prevention and reduction of alcohol related harm in Europe. EUROCARE is a member of the European Public Health and Agriculture Consortium and broadly supports their consultation response relating to chronic disease and healthy diet, but would like to respond specifically on the issue of alcohol policy.

Europe is the heaviest drinking region in the world, with a consumption level of 11 litres of alcohol per adult per year¹. This is over 2.5 times the rest of the world average. Alcohol is a key health determinant and is responsible for 7.4% of all ill - health and early death in Europe, which makes it the third leading risk factor after tobacco and high blood pressure².

EUROCARE believes that the CAP can play a profound role in improving health and tackling health inequality, but to do this requires a systematic reform. Production of food and agricultural policy are important social determinants of health. The CAP is an important European policy, but needs to change to reflect current and future challenges and be relevant for its citizens. Reducing levels of alcohol consumption and alcohol related harm, and related social inequalities are a major challenge for the EU. Eurocare would also like to stress that currently chronic diseases are a significant burden in the EU and represent a major barrier to sustainable development in the EU. The cost of alcohol-related harm to the EU's economy has been estimated at €125 billion for 2003, equivalent to 1.3% of GDP³. This estimate includes, amongst others, losses due to underperformance at work, work absenteeism and premature death. The actual spending on alcohol-related problems in the EU is estimated at about €66 billion, e.g. on crime, traffic accidents, health, and disease treatment and prevention⁴. Alcohol consumption, together with diet, physical activity and

¹ WHO, World drink trends

² Top 9 risk factors for ill-health in the EU, Adapted from WHO's Global Burden of Disease study (Rehm et al 2004 Alcohol in Europe Anderson P, Baumberg B, Institute of Alcohol Studies, UK June 2006

³ Report on Alcohol in Europe (Anderson and Baumberg), June 2006



tobacco use are the primary modifiable determinants of chronic disease. Excessive consumption of alcohol is a risk factor for obesity and overweight, cardio-vascular disease, cancer and diabetes type II.

Eurocare welcomes the opportunity to contribute to the **“Green paper on promotion measures and information provision for agricultural products”** Although this Green paper, deals with broad range of products, Eurocare would like to highlight the role of the CAP funds relating to alcohol consumption and EU policy coherence.

QUESTIONS

1. To meet the new challenges in local, European and global markets and ensure the greatest possible added value for Europe, what should the aims of the agricultural product information and promotion policy be? In addition to measures already taken by other players (e.g. the private sector), what contribution should this policy make? (800)

The added value for Europe is to promote sustainable and healthy diets. European agricultural products should be healthy, therefore promotion of products that are known to be harmful to health should not be allowed.

Eurocare acknowledges the positive contribution made by the production and sale of alcoholic beverages to the economy of the EU, in terms of revenues and employment. However, alcohol-attributable disease, injury and violence also drain the health, welfare, employment and criminal justice sectors across the EU some €125bn a year (equivalent to 1.3% GDP). Wine and other alcoholic beverages are the third leading global risk for burden of disease and cause some 60 diseases and conditions (WHO, Health Risks 2009). Alcoholic beverages are an addictive substance and should not be promoted as other commodities through the European funds.

Regional and local markets

2. What information and promotion measures should be put in place to develop stronger local and regional markets? (500)



4. What measures should be developed to achieve the aims set and thus optimise the European Union's intervention in the internal market? (800)

3. What are the specific needs in relation to information on and promotion of European products and what should the aims be in the internal market? Max 800 characters

- The overall aim of the information and promotion initiatives should be to encourage consumption of healthy products and creation of healthy lifestyles. As such promotion of any form of drinking alcohol (including moderate, responsible drinking) is contradictory to the motion of protection of health of the European citizens. As alcohol even in small quantities has been identified to be a risk factor for developing a number of diseases, for example cancer (IARC, Monograph, 2010)

Promotion in the external market

5. What are the specific needs in terms of information on and promotion of European products and what should the aims be in the external market? Max 800 characters

- Promoting "European products" must not be at the expense of low and middle income countries efforts to develop their own agriculture production systems and markets.
- Non-Communicable diseases, related to lifestyle factors including diet, are a growing problem in developing countries and adoption of western diet and food habits is one of the main factors.
- In 2008, 36 million people died from non-communicable diseases, representing 63 per cent of the 57 million global deaths that year. Non-communicable diseases affect the developing world and lower-income populations hardest. Alcohol is the third risk factor for non-communicable diseases

6. What measures should be developed to achieve the aims set and thus optimise the European Union's intervention in the external market? Max 800 characters

Low income countries often lack alcohol policies to protect their nations and citizens and this makes them vulnerable to the growing commercial pressures. This lack of regulation and control of the sale and marketing of alcohol offer the industry an opportunity to market their products without restrictions, leaving the rules they apply in the West behind.



The EU should ensure that its external promotional activities are in compliance with the policy the EU recommends for its Member States.

Beneficiaries

7. Who should benefit? Should priority be given to certain beneficiaries? Max 500 characters

- European citizens should be the main beneficiary, in terms of improved quality of products, better health.

Synergies with other CAP instruments

8. In order to develop more effective and more ambitious strategies for accessing local, European and global markets, are there any conceivable synergies between the various promotion and information tools available to the EU? Max 800 characters

- Promotion funding should not contradict EU activities in other policy areas, such as prevention of alcohol related harm (EU Alcohol Strategy).

Eligible products

9. Which agricultural and agri-food products should be eligible and what criteria should be used to decide? Max 500 characters

- Promotion of products known as damaging to human health, encouraging even “moderate and responsible drinking levels” of products containing alcohol is incoherent with EU Public Health Policy, EU Alcohol Strategy and EU commitments to WHO activities (WHO Global Alcohol Strategy)

- Public health, social and environmental criteria should be the main focus when developing the overall objectives for promotion and information measures and determining what products made eligible.



Actions and messages

10. To be more incisive, which means of promotion should be used? Should the focus be on promoting key messages, such as '5 portions of fruit and vegetables a day' or 'the taste of Europe', or on product ranges (such as cheese, wine, etc.)? max 500 characters

- Promote key messages/themes that are flexible, adaptable to national contexts. They should encourage greater intake of fruit and vegetables, as well as buying local products.
- They should not focus on specific products

Origin

11. Would it be appropriate to provide more space for the indication of origin of the product and what criteria should be used to decide? Max 500 characters

Brands

12. Would it be appropriate to use brands as a promotion tool in the external market and what criteria should be used to decide? Max 800

Multi country programmes

13. What is stopping the presentation and implementation of Multi-country programmes? What would need to be done to encourage these programmes with a greater European dimension? Max 800

14. Do any other types of programmes and/or tools need to be developed? Max 500

- Funding of workshops and seminars around identified themes or messages would encourage new networks, exchange of information and multi-country programmes.

Implementation

15. How can the selection and implementation of programmes be simplified and improved?

General comments

16. Participants are invited to raise any questions concerning the information and



promotion policy for agricultural products that have not been covered in this document.

Max 800

- Policy coherence needs to be ensured in the European spending, resources should not be wasted on promotion of products that are harmful to health of the Europeans.
- Public funding for promotion of alcohol in any form is inconsistent with the EU public health goals. Alcohol products should be excluded from the CAP information and promotion policy. The programme currently funds promotion of wine and spirits on both the internal and external markets to “promote responsible alcohol consumption”. We do not find it appropriate, nor the role of wine or alcohol producers, whose incomes depend on the maintenance and increase of the alcohol consumption levels, to promote responsible consumption. Such promotion activities could be better accomplished by independent public health bodies.

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