

18<sup>th</sup> of December, 2024

**Re: TRIS Notification FOR Finland's proposed amendments to the Alcohol LAW BY THE LITHUANIAN TOBACCO AND ALCOHOL CONTROL COALITION (NTAKK)**

The Lithuanian Tobacco and Alcohol Control Coalition (NTAKK) urges the European Commission to reject the proposed amendments to Finland's Alcohol Act. These changes are likely to increase alcohol availability and consumption, contribute to greater alcohol related harm and health inequalities. By rejecting this proposal, the European Commission would contribute to protection and health promotion in Finnish society and more sustainable health care system.

The proposed amendments damage evidence-based alcohol control policy in Finland, which currently ensures low alcohol related harm in the region burdened by massive alcohol related harm. By permitting same-day home delivery of alcohol the amendment undermines the European Framework for Action on Alcohol, which calls on limiting alcohol consumption via national alcohol strategies that prioritize managing availability of alcohol.

It also favors narrow alcohol industry profit interest, over the public health of the whole population and public good. The introduction of same-day home delivery of alcohol will likely exacerbate public health challenges, including binge drinking, domestic violence, risks to older adults, and easier access to alcohol for minors. Research shows that alcohol harm mediated by home delivery will likely to impact problem drinkers and vulnerable populations more, thereby contributing to health inequalities.

We call on the European Commission to reject this legislation, demonstrate the commitment to protect public health and well-being of European citizens, in line with the Article 168 of the Treaty on the Functioning of the European Union.

The Lithuanian Tobacco and Alcohol Control Coalition (NTAKK) is an umbrella advocacy organization for evidence-based control policies for all psychoactive substance use, uniting over 30 organizations working in the public health field in Lithuania. We have strong presence in policy research and advocacy, and consistent civil society backing by medical, addiction and public health professionals, youth organizations, organizations dealing with the consequences of the substance harm.