

EUROPEAN ALCOHOL POLICY ALLIANCE (EUROCARE) POSITION ON

Government proposal to Parliament for an Act amending the Alcohol Act

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OUR POSITION

The European Alcohol Policy Alliance (Eurocare) urges the European Commission to reject the proposed amendments to Finland's Alcohol Act. These changes are likely to lead to increased alcohol consumption, greater health inequalities, and more alcohol-related harm. By rejecting this proposal, the European Commission can protect the health of Finnish society in all its policies, including trade.

THE EUROPEAN ALCOHOL POLICY ALLIANCE (EUROCARE)

The European Alcohol Policy Alliance (Eurocare) is an alliance of non-governmental and public health organisations with over 50 member organisations across 19 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 to the public; education and training of community care workers; the provision of workplace and school-based programmes; counselling services, residential support and alcohol-free initiatives for people with alcohol use disorders.

Eurocare's mission is to promote policies that prevent and reduce alcohol-related harm through advocacy at the European level. Its message on alcohol consumption is simple: "less is better."

ARGUMENTATION

If passed, this law will likely increase alcohol consumption, health inequalities and alcohol-related harm.

Home Is Where Most People Consume Alcohol

The Finnish Institute for Health and Welfare THL <u>has identified</u> the home environment – whether one's own home, someone else's, or another private space – as the most common setting for alcohol consumption in Finland. In this context, same-day home deliveries of alcohol are particularly problematic from a risk consumption perspective.

Prolonged Drinking Sessions and Increased Consumption

In Finland, around 15% of men and 9% of women drink above the risk limits. Studies on home alcohol delivery consistently show that it increases alcohol consumption and is



associated with binge drinking. In a study in Australia, up to 20% of home delivery users reported that it enabled them to continue drinking alcohol when their supply ran out. About one-third of these users said they would have stopped drinking if home delivery had not been available.

Adverse Impact on High-Risk Drinkers

In many countries, home delivery is more likely to be used by high-risk alcohol consumers. A <u>recent study</u> found that same-day express delivery was particularly useful for those who consumed alcohol at risk. Hence, the proposal is likely to increase health inequalities in Finland.

Potential Increase in Domestic and Intimate Partner Violence

Increasing the access to alcohol, shifting consumption away from controlled spaces (such as restaurants) to the home, and longer periods of continuous drinking can increase the risk of domestic and intimate partner violence. Much intimate partner violence occurs when the perpetrator, the victim, or both have consumed alcohol. In Finland, 70% of murders and homicides occur under the influence of alcohol (Life Crime Statistics, 2020).

Adverse Impact on Older People

Home delivery can increase the risks associated with alcohol consumption among older people. In the future, an increasing number of older adults will likely use home delivery services. In Finland, there is <u>concern</u> that older adults typically drink alcohol alone at home. It should also be noted that older adults have a much lower tolerance to alcohol, as evidenced by lower risk consumption thresholds. Increased alcohol consumption at home is likely to lead to an increase in alcohol-related injuries, accidents, and deaths in the ageing population.

Increased Accessibility of Alcohol to Young People

The evaluation of the proposal states that <u>one of the main factors</u> contributing to the decline in alcohol consumption among young people has been the increased difficulty in getting access to alcohol, largely due to a stricter enforcement of age limits. These controls have led to a higher average age at which young people begin drinking, which in turn <u>affects alcohol consumption patterns</u> in adulthood and further harm.

Research <u>evidence</u> shows that home delivery of alcohol increases the likelihood of minors gaining access to alcohol, even when operators claim they are checking age. Checking the buyer's age when the order takes place does not eliminate the possibility of a minor opening the door for the driver delivering the alcohol. Increased availability and widespread home delivery of alcohol undermine the well-being of children and adolescents and jeopardize the downward trend in youth alcohol consumption.

Undermining a Cost-Effective & Efficient Alcohol Policy





Preventing alcohol-related harm is more cost-effective for society than providing treatment. The most <u>cost-effective policies</u> for preventing alcohol-related harm are regulating access, controlling prices, and restricting marketing, according to the World Health Organisation. Sweden's Systembolaget monopoly demonstrates the effectiveness of restricted availability in protecting public health.

By permitting fast home delivery of alcohol the amendment threatens the country's long-standing regulatory consistency and public health strategy. It is also undermining the <u>European Framework for Action on Alcohol</u>, which calls for limiting alcohol consumption via national alcohol strategies that prioritize managing availability of alcohol.

Worsening an Existing Conflict of Interest

Allowing home delivery will weaken both the ability of the person handing over the drinks to enforce the prohibitions of the Alcohol Act and the ability of authorities to monitor compliance. Moreover, health-harming industries such as the alcohol industry have an interest in protecting their sales and profits, not improving health. This creates an inherent conflict of interest that the proposed act fails to address. For example, this bill aims to shift the responsibility for age control and supervision of sales to intoxicated individuals to the third-party operators that supply alcohol to customers. This puts couriers in a tough position, due to potential pressure they might face from alcohol vendors. For instance, companies may prioritize avoiding additional costs, such as returning undelivered goods, potentially discouraging couriers from refusing delivery to minors or intoxicated individuals.

CONCLUSION

The European Alcohol Policy Alliance (Eurocare) strongly opposes the proposed amendments to Finland's Alcohol Act, as they risk significantly increasing alcohol consumption, health inequalities, and alcohol-related harm in the Finish society. The introduction of same-day home delivery of alcohol will likely exacerbate serious public health challenges, including binge drinking, domestic violence, risks to older adults, and easier access to alcohol for minors.

These amendments conflict with the World Health Organisation's evidence-based recommendations for cost-effective measures to prevent alcohol related harm, which emphasise regulating access and reducing availability of alcohol. Furthermore, the proposal disregards the inherent conflict of interest between public health goals and the profit-driven priorities of the alcohol industry, weakening enforcement of critical safeguards.

Eurocare calls on the European Commission to reject this legislation, reinforcing its commitment to protecting public health and ensuring the well-being of European citizens, in line with the Article 168 of the Treaty on the Functioning of the European Union.