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**Government proposal to Parliament for an Act amending the Alcohol Act
TRIS Notification Number: 20240521FI (Finland)**

Submission from Alcohol Action Ireland

Background

Alcohol Action Ireland (AAI) was established in 2003 and is the national independent advocate for reducing alcohol harm. We campaign for the burden of alcohol harm to be lifted from the individual, community and State, and have a strong track record in campaigning, advocacy, research and information provision.

Our work involves providing information on alcohol-related issues, creating awareness of alcohol-related harm and offering policy solutions with the potential to reduce that harm, with a particular emphasis on the implementation of the Public Health (Alcohol) Act 2018.

AAI is a member of the European Alcohol Policy Alliance, Eurocare.

Summary

We are highly concerned about legislative proposals from the Finnish government as notified to the European Commission Government proposal to Parliament for an Act amending the Alcohol Act TRIS Notification Number: 20240521FI (Finland)

We strongly agree with the points made by Eurocare in its submission to the TRIS process and we urge 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.

In addition, we would also like to point to Ireland's experience in addressing alcohol issues through legislation.

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 [has identified](#) 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 [recent study](#) found that same-day express delivery was popular with high-risk drinkers and potentially undermine other policy efforts to reduce drinking.

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). It is of note that the South Australia government has recently introduced [draft legislation](#) to reduce gendered violence by restricting alcohol sales and delivery timeframes.

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 [concern](#) 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 [one of the main factors](#) 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 [affects alcohol consumption patterns](#) in adulthood and further harm.

Research [evidence](#) 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.

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.

Undermining a Cost-Effective & Efficient Alcohol Policy

Preventing alcohol-related harm is more cost-effective for society than providing treatment. The most [cost-effective policies](#) 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 [European Framework for Action on Alcohol](#), which calls for limiting alcohol consumption via national alcohol strategies that prioritize managing availability of alcohol.

The infographic is titled "World Health Organisation's 'Best Buys' are policy solutions that are highly cost-effective, evidence-based, and yield a significant return on investment for governments to adopt". It features the AlcoholAction Ireland logo in the top right corner. Below the title, there are three columns, each with an icon and a text box. The first column has an icon of a tax document and coins, with the text "Increase excise taxes on alcoholic beverages" and the word "PRICE" in large green letters. The second column has an icon of a megaphone, with the text "Enact and enforce bans or comprehensive restrictions on exposure to alcohol advertising (across multiple types of media)" and the word "MARKETING" in large green letters. The third column has an icon of a clock with a beer glass inside, with the text "Enact and enforce restrictions on the physical availability of retailed alcohol (via reduced hours of sale)" and the word "AVAILABILITY" in large green letters.

Ireland's experience

In recent years Ireland has made efforts to reduce alcohol consumption via implementation of controls on price and marketing through the [Public Health \(Alcohol\) Act 2018](#). This is having some impact with a 10% reduction in alcohol consumption per capita since the passage of the legislation. However, it is being hampered by the widespread availability of alcohol in pubs, shops/supermarkets/off-licenses and [extensive home delivery services](#) which are largely unregulated and which increased significantly during the Covid pandemic.

CONCLUSION

Alcohol Action Ireland 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 Finnish 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.

AAI joins with Eurocare and 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.