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**Finnish Association for Substance Abuse Prevention EHYT, Helsinki, Finland**

## **The draft Government proposal to the Finnish Parliament for an Act amending the Alcohol Act**

**TRIS - European Commission**

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### **Opinion of the Finnish Association for Substance Abuse Prevention (EHYT) on the draft Government Bill to Parliament for an Act amending the Alcohol Act**

The Finnish Association for Substance Abuse Prevention (EHYT) is grateful for the opportunity to provide comments on the Government's proposal to Parliament to amend the Alcohol Act. The proposed law would amend the Alcohol Act to allow Alko Oy, the alcohol monopoly, and licensed retailers to sell alcoholic beverages online and through distribution methods such as home delivery and pick-up services.

EHYT opposes the proposed amendment that would allow online sales of alcoholic beverages, the expansion of distribution channels, and new retail concepts. In our view, the amendment contradicts the purpose and objective of the Alcohol Act, which is to protect the public health. Similarly, the proposed amendment conflicts with Article 19(3) of the Constitution of Finland, which requires public authorities to promote the public health. The legislative proposal also does not support the constitutional objective of safeguarding and supporting children's well-being and development.

The proposal does not align with the EU's public health commitments and undermines EU-wide goals related to non-discrimination. Therefore, EHYT calls on the European Commission to dismiss these proposed amendments.

#### **Discriminatory treatment on the EU alcohol market**

The Finnish government has already implemented a law that the EU Commission has flagged as problematic. Now, the Finnish government plans to proceed with enforcing this controversial legislation. The government's earlier proposal to expand the retail sales of fermented beverages with up to 8% alcohol content has proven to be problematic under EU law. It is unclear whether the EU legal risks of the proposed legislative amendment have been assessed thoroughly enough. The government programme explicitly states that "the reforms will be implemented in a manner acceptable from the perspective of EU law".

As highlighted by IOGT Sweden in their submission, the proposal raises serious concerns regarding discrimination within the single market. Allowing home delivery exclusively for Finnish farm wines and craft beers (with an alcohol content of up to 12-13%) creates an unfair advantage that is not extended to similar wine and beer businesses in other EU member states. This approach contradicts EU legal principles, which require that national measures must be non-discriminatory in both law and practice.



Consequently, the proposal risks failing the EU's non-discrimination standards and stands at odds with the Visnapuu ruling. The ruling established that “the objective of promoting tourism” and “limited sales only allowed from the production site” made the derogation from the monopoly permissible under Article 34 of the TFEU, but only for businesses established in Finland.

Allowing derogations from the monopoly without any justifiable objectives or limitations, exclusively for businesses established in Finland, and permitting distance sales of alcoholic beverages only for these businesses raises doubts about whether the Finnish Alcohol Act can continue to uphold public health protections in a consistent and systematic manner, as required by EU case law.

It can also be noted, unrelated to direct public health considerations, that permitting home delivery for domestic products could contradict Finland's current prohibition on cross-border e-commerce for non-monopoly items, such as farm wines and beers with an alcohol content exceeding 8% by volume. While Finnish companies would benefit from this delivery privilege, businesses from other EU member states would be excluded from similar access. This disparity imposes a restriction on free competition within the EU market, giving an advantage to domestic producers over foreign competitors, which could be deemed inconsistent with EU law.

Additionally, IOGT has noted that the retail privileges afforded to craft beers under the current Alcohol Act demonstrate an inherent form of discrimination. This is especially apparent for beverages with an alcohol content between 8% and 12% ABV, which surpass the limit set for fermented beverages sold in food retail but are still allowed for craft beers. While this discrepancy stems from an earlier legislative amendment rather than the current proposal, it continues to be relevant. The European Court of Justice did not examine this inconsistency in the Visnapuu case, as the amendment was introduced later, yet it remains a significant issue under EU scrutiny.

### **The amendments to the Alcohol Act conflict with the EU's public health objectives**

EHYT is also puzzled by the approach of amending the Alcohol Act through several separate bills during the government's term without an overall assessment of the impact of the changes. The proposed amendment should also be assessed in relation to the distance selling from the EU to Finland. The government programme states that the public health status of the current system of an exclusive monopoly on retail alcohol sales will not be changed. In reality, however, the government's proposals move in the opposite direction.

The proposed amendment is inconsistent with the EU's public health obligations outlined in Article 168 of the Treaty on the Functioning of the European Union (TFEU), which demands a high level of health protection across all Union policies. The proposal's promotion of increased alcohol availability through home delivery directly opposes the European Action Plan to Reduce the Harmful Use of Alcohol and Europe's Beating Cancer Plan, both of which encourage member states to adopt measures that limit alcohol consumption. Without robust control mechanisms, this amendment could worsen alcohol-related health issues across the population.

Research consistently shows that greater alcohol availability leads to increased rates of alcohol-related harm. The Nordic model of restricting access through alcohol monopolies has proven effective in mitigating these harms, emphasizing the importance of controlling availability for public health. Expanding distribution channels to include products like farm wines and craft beers risks undermining Finland's public health strategy, which is built on limiting alcohol access through a monopoly system.



Allowing additional alcohol categories to bypass this system weakens regulatory consistency. Public health actors, such as IOGT, have stated that the Visnapuu case (C-198/14) recognized the significance of on-site controls; however, this justification becomes less effective when home delivery is permitted for certain domestic products.

### **Estimate of the impact on public finances**

EHYT sees that the proposal has not sufficiently assessed the impact on public finances. Studies have found that the tax revenue is not enough to cover the billions of euros in costs to the public sector from alcohol-related harm (EHYT & FCG, 2024; WHO, 2012; WHO, 2021, Sornpaisarn et al., 2017).

Alcohol has two main effects on a functioning economy: (1) it increases public sector costs and (2) it reduces the number of taxpayers.

Expanding access to alcohol increases costs in public social and health services by increasing the burden of disease and services (cancers, accidents, child protection, etc.). In addition, alcohol is a burden on the police, the judiciary, and emergency services. The welfare regions are already running significant deficits and are unable to fulfil their tasks. According to a study by the FCG Finnish Consulting Group (2024), alcohol could cost the public health service between €648 million and €1.14 billion a year.

Alcohol increases the sustainability gap by taking people out of the workforce, reducing productivity and work capacity, resulting in a significant loss of human capital and labour. In total, alcohol causes more than 37,000 years of premature deaths every year (Potential Years of Life Lost, PYLL), which can result in up to €1.6 billion (FCG & EHYT, 2024) in lost human capital.

Preventing alcohol-related harm is more cost-effective for society than providing substance abuse treatment services and other remedial work. From a public finance perspective, the most cost-effective means of preventing alcohol harm are regulating access, controlling prices, and restricting marketing (WHO, 2021). If deregulation takes place, there should be a heightened focus on prevention, both on the individual and community levels. However, at the same time, this focus will be compromised as welfare areas adapt and funding for organisations decreases.

EHYT recommends conducting a comprehensive study on the impact of alcohol on public finances, considering all societal costs. The most recent study by the Finnish Institute for Health and Welfare (THL) was conducted in 2013. In Finland, research and monitoring of substance abuse are under-resourced, which hampers evidence-based decision-making.

### **Assessment of the impact on businesses**

EHYT stresses that alcohol policy should be guided by social and health policy interests rather than the interests of the alcohol industry. Alcohol is a significant factor in the disease burden and negatively affects the ability to work and function in Finland. Alcohol policy should aim to reduce overall consumption, reduce social and health inequalities, and reduce harm – all based on scientific evidence.

The 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. However, it is unrealistic to expect couriers to refuse delivery to minors and intoxicated persons if this results in added costs, for example in returning the product.



In addition, the impact on delivery personnel should be evaluated, as they may face significant safety risks if they deliver alcohol alone. Particularly vulnerable are drivers operating with a license but without an employment contract. It remains unclear whether delivery personnel would be subject to the same criminal liability as in retail sales and on-premises consumption if they do not perform lawful supervision. The proposal raises the question of what responsibilities a delivery person has if they have concerns about the children of the family that placed the order.

Finns seem to lack confidence in the effective enforcement of age limits and the ban on selling to intoxicated persons if home delivery is allowed. It is striking that in the 2024 Alcohol Policy Opinions survey by the Finnish Institute for Health and Welfare THL, 75% of respondents had little or no confidence in the effectiveness of controls on the possible home delivery of alcohol.

The draft law has assessed the impact of home delivery on businesses whose activity is the production, sale, or distribution of alcohol. However, alcohol has a wider impact on businesses, as the majority of Finns consume alcohol. Alcohol consumption in Finnish workplaces is estimated to cost EUR 500 million a year due to absenteeism, reduced productivity, shortened working lives, and accidents at work (Miettinen & Rantapuska, 2018).

For example, the increase in remote work risks increasing costs and other negative effects on working life. Remote work has been linked to higher alcohol consumption, particularly during the interest rate pandemic. In the U.S., for instance, there have been reports of increased alcohol consumption before 5 p.m. The ease of commuting, coupled with working from home, may not only encourage higher alcohol intake but also lead to drinking during or immediately after the workday (Nielsen et al., 2021; Boschuetz, N. et al., 2020).

Alcohol-related impairment and incapacity for work present significant risks to businesses and society and should be addressed in alcohol legislation. However, the effects of alcohol on other business and economic activities have been excluded from the impact assessment.

### **Impact assessment on the functioning of public authorities**

Allowing home delivery will substantially 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.

The proposal contains a comprehensive assessment of the impact on the functioning of public authorities. Currently, age-limit controls rely heavily on operators' self-monitoring activities, developed as part of the PAKKA approach. A major challenge in monitoring age limits is the lack of national data on the effectiveness of these controls, with information coming only from traders themselves and fragmentally from different municipalities.

Therefore, authorities must be guaranteed the possibility of verifying that permit holders are fulfilling their obligations. The law should grant them extensive monitoring possibilities, including the ability to conduct purchase tests and extensive rights to information. A system based solely on self-monitoring does not guarantee high-quality information on the implementation of age and intoxication controls, nor does it provide reliable data on increases in alcohol-related harm. Therefore, assessing the potential impact of the law after its implementation is difficult. The evaluation of the proposal should also account for the need to ensure that the Finnish Institute for Health and Welfare THL has sufficient resources to conduct a thorough impact assessment.



The proposal provides €320,000 (equivalent to four person-years) to regional administrative agencies to support the increased control requirements. This amount is severely underestimated for managing a virtually unlimited number of disposal sites with an approach that has not yet been developed. The control resources should be increased by at least four times. Authorities should be given the right to monitor the technical implementation of age and substance abuse controls, with sufficient resources allocated to support this effort.

### **Impact on well-being and health**

The presentation provides a fairly comprehensive analysis of the impact of the change on people's health and well-being. Alcohol is known to have a negative impact on human health, causing more than 200 different diseases and conditions.

Studies on home alcohol delivery consistently show that it increases alcohol consumption and is associated with binge drinking. In many countries, home delivery is more likely to be used by high-risk alcohol consumers (Grossman, E. et al. 2022). The proposal is likely to increase health inequalities in Finland.

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. Additionally, another study found that same-day express delivery was particularly useful for those who consumed alcohol at risk (e.g. Colbert, S. et al., 2023; Coomber et al. 2024).

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 (Mäkelä et al., 2023). This makes the issue of home delivery of alcoholic beverages particularly concerning. It is clear that fast, same-day home deliveries of alcohol are particularly problematic from a risk consumption perspective.

In Finland, around 15% of men and 9% of women drink above the risk limits. 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 (e.g. Livingston, 2011). In Finland, 70% of murders and homicides occur under the influence of alcohol (Life Crime Statistics, 2020).

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 (Mäkelä, P. et al., 2023.) 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.

### **Impact on children, young people, and families**

Alcohol has a direct and indirect negative impact on children and young people. Children and young people risk hindering their development if they use alcohol. On the other hand, alcohol use in the family can compromise a safe environment for children to grow up in. The proposed change must be



considered with particular attention to its impact on children and young people, who are strongly affected.

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 (Raitasalo et al., 2018), 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 (Härkönen & Mäkelä, 2022) 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 (e.g. Noel & Rosenthal, 2023). 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.

It is important to note that as consumption and shopping increasingly move into the home, adults may become less aware of their child's whereabouts and activities. Studies have shown that when adults drink alcohol at home, their ability to supervise children is impaired (Freisthler et al., 2015).

It is often assumed that harm from alcohol consumption is limited to families with heavy drinkers. However, children affected by parental alcohol consumption are most often found in ordinary working families, where alcohol-related problems may not be immediately apparent.

In Finland, about 89,000 children have parents who have experienced at least one serious substance abuse problem requiring treatment, which is about 8.7% of all underage children. The majority of these parents have a history of alcohol-related problems (Raitasalo, 2024). The actual number of children living with a parent who has a substance abuse problem is likely higher than the above estimate, based solely on register data.

Only the most serious cases and those who have sought and received treatment can be identified from the register data. According to the Fragile Childhood ('Lasinen lapsuus') survey, around one in four adult respondents said they had experienced excessive substance use in their childhood home. Estimates from different countries indicate that between 19% and 32% of children have parents with alcohol problems. In Sweden, for example, the figure is around 20% (Ramstedt et al., 2019).

The current proposal does not impose limits on the amount of alcohol delivered to homes, which could result in greater amounts of alcohol being kept at home. Home delivery of alcohol has also been found to increase the amount of alcohol purchased. In turn, the amount of alcohol kept in the home has been associated with alcohol experimentation among children and adolescents (Komro et al., 2007).

### **Child protection issues are already a concern, even before alcohol is brought into the home**

Current resources available for child protection is already concerning worrying and cannot cope with the increased burden of alcohol without serious consequences for children's growth and development. In 2023, 110,269 children were reported to child protection services, accounting for over 10% of all children – an 11% increase from the previous year (Forssell & Kuoppala, 2024).



A parent's alcohol problem significantly increases the risk of a child being placed outside the home. Parental alcohol problems and related violence are the most common reasons for removing a child from their care. In 2023, 11,300 children were placed outside their homes, including 4,873 in emergency care – an 8% increase from the previous year. The reform is likely to increase the workload in child protection.

In 2019, the six largest cities in Finland spent a total of over EUR 400 million on child protection, with expenditures of 12,248 to 24,908 euros per child-protection client, depending on the city.

Increased access to alcohol has also been linked to higher levels of domestic and intimate partner violence. Not all studies can attribute this increase in violence solely to socio-economic factors. The number of victims of domestic and intimate partner violence may therefore increase as alcohol is made more readily available through home delivery.

### **Relationship with distance buying and selling from abroad**

A frequent argument for allowing home delivery of alcohol is that purchases from foreign online shops can already be delivered to one's door. The same problems as above apply to distance purchases, and it should be made clearer how age limits and intoxication are monitored when drinks ordered from abroad are delivered, or how much of the alcohol purchased ends up in the hands of young people.

However, a major problem with domestic home delivery is that it would allow for express deliveries of alcohol, even on the same day. Expedited deliveries allow for longer periods of uninterrupted drinking. Distance purchases, on the other hand, can take several days to arrive, which slightly reduces the risks associated with distance purchases compared to express deliveries. However, if the bill passes, express deliveries of alcohol during the same day should be prohibited. There should be a clear time limit in the law to ensure that shipments do not take place during the same day.

The draft legislation on home delivery is partly incomplete, as delivery has different disadvantages depending on the time of delivery. The impact assessment should look at how many countries allow the express delivery of alcohol.

If the reform is to be implemented, it should take into account the following points:

If home delivery is to be allowed despite the above-mentioned disadvantages, EHYT proposes that the reform be implemented as a regional pilot, for example in a selected city or one well-being services county. This would allow for a pilot setting to monitor the effects of the reform in relation to peer groups and to develop a control system to address real problems. A similar pilot was carried out in Sweden when home delivery was allowed for Systembolaget.

EHYT appreciates that the proposal refrains from restricting retail sales and does not allow home delivery for products that exceed the percentage and manufacturing method limits for retail sales, in accordance with the exceptions in the Alcohol Act. If drinks are allowed for home delivery from farms or breweries, the public health status of the alcohol monopoly will be on a slippery slope. This would be contrary to Prime Minister Petteri Orpo's government programme, which explicitly states that 'the government will not change the public health status of Alko'.

EHYT recommends that express delivery should not be allowed. The law should stipulate that an order containing alcohol can only be delivered no sooner than the next day. This would help to prevent



further drinking and harm to at-risk users. The proposal should also limit the amount of alcohol that can be delivered at one time.

The company trading in alcohol must be responsible for the legality of its activities throughout the supply chain. The responsibility for the legal supply of alcohol should always rest with the seller and not just the delivery operator. As noted in the business impact section of the bill, food delivery services often use independent contractors and operate in a platform economy. They are not salaried employees and therefore do not have employment security. Thus, they do not play a role in the overall picture. Responsibility and sanctions should not be imposed on individual vulnerable fast movers.

EHYT stresses that if the supply authorisation model is adopted, it is essential to impose strict conditions, requirements, and penalties for granting the authorisation. The draft law raises the question of whether a licence is also required for deliveries from foreign companies and how it regulates the import of alcoholic beverages delivered from foreign online shops.

The licence must specify the exact requirements for the training, and the supervisory authority must oversee competence. The licence must be issued for a limited period, after which it must be renewed. This will ensure that the licence holder stays up-to-date on their obligations and legislation.

EHYT considers that the proposed maximum fine of EUR 20,000 for non-compliance with the Alcohol Act is too low, given the scale of alcohol traders' businesses and the potential risks of expanding alcohol sales.

In Finland, alcohol sales amount to nearly €5 billion a year across all distribution channels, while the societal costs are also calculated in the billions. The penalty amount should be based on the model in the gambling law currently being drafted. This penalty ranges from 1,000 and 100,000 euros. For legal entities, it is 4% of the turnover, with a minimum of 10,000 euros and a maximum of 5 million euros. Under the Gambling Act, penalties for individuals are capped at 3,000 to 40,000 euros.

The penalty should be proportional to the size of the operator, ensuring that it effectively deters each type of entity – whether it's the licensed source, the platform owner, or a large retailer such as a grocery chain. The authority must also have the clear ability to revoke the licence from both the alcohol seller and the transport service provider.

EHYT considers it problematic that the proposed supply authorisation model shifts the responsibility for age and intoxication control away from the alcohol seller. Since many couriers are self-employed, this responsibility becomes disproportionately high and exposes them to unreasonable safety risks. The proposal also raises concerns about how to handle situations where the buyer and the recipient are not the same person.

EHYT points out that compliance with sales bans or curfews must, even indirectly, cause a loss of income for delivery staff. It is unlikely that a courier will return already paid-for alcohol to a restaurant if the recipient is unresponsive, too intoxicated, or if the sale has expired.

The bill stipulates that both the purchaser and the recipient of an alcoholic beverage must show proof of age each time they buy or receive alcohol. The age limit should always be verified both at the time of ordering and at the time of delivery. EHYT suggests that the supplier should also be obliged to be able to reliably document the frequency and method of age and intoxication checks and how frequently deliveries are refused. Extensive data on this should be collected, for example through a uniform





system. If the data is fragmented and protected by corporate confidentiality, it may be impossible to assess the impact of the law.

EHYT finds it problematic that the draft law fails to concretely address how sales bans under Section 37(2) and (3) of the Alcohol Act will be enforced. In licensed premises or retail outlets, staff can assess a customer's behaviour over time to make informed decisions about whether to refuse a sale. This is not possible with online orders or home delivery of alcohol. The proposal should address the supplier's duty of care. Delivery couriers should be required to file a child protection report and a concern report if they have concerns about an individual's or family's situation.

EHYT stresses that age and intoxication controls cannot be left solely to companies' self-monitoring.

EHYT points out that the proposal clarifies the liability of the employee who supplies the alcohol. Article 90 of the Alcohol Act establishes criminal liability for vendors who violate the prohibition on selling or serving alcohol. Similar criminal provisions should also apply to violations of supply bans.

Under the proposal, alcohol could be delivered not only to home and business addresses but also to public places. EHYT points out that bringing alcohol to public places will likely increase the risk of disorderly behaviour. EHYT also notes that the reform would conflict with Chapter 2, Article 4 of the Public Order Act, which prohibits the consumption of intoxicating substances in public places in urban areas.

EHYT considers it justified to restrict alcohol supply in locations when they are frequented by children and young people. This reflects the positive experience with the tobacco bans established under the Tobacco Act.

Prohibitions on alcohol supply should ensure that it cannot be ordered in places intended for use by children or young people.

The proposal should therefore specify that delivery prohibitions must include, at a minimum, the following locations:

- Indoor and outdoor facilities of vocational training and upper secondary education establishments.
- Playgrounds, for which a safety document must be drawn up in accordance with the Consumer Safety Act.
- Outdoor areas of institutions providing care under the Child Protection Act or the Mental Health Act that are intended for persons under 18 years of age (13.4.2022/283).
- Sports facilities or youth facilities organised by the town or municipality.

EHYT expresses concern that enforcing supply bans at these sites may be difficult in practice, as there is no comprehensive, up-to-date database of such sites and authorities lack the means to monitor compliance. While a mapping service can be used to ban certain sites, monitoring compliance is difficult if the prohibition is only in force during youth activities, even with technical solutions.

EHYT proposes that the law should grant broad access rights to authorities and researchers to data on purchases, sales, age limits, and intoxication checks for surveillance and research purposes.



EHYT stresses the importance of enabling authorities to make test purchases (i.e. mystery shopping) to effectively monitor activities. Failure to comply must result in the possible imposition of significant fines and the loss of the supply licence. Furthermore, authorities must receive adequate resources to ensure effective monitoring and impact assessment.

Overall, home delivery of alcohol involves various risks across society. Therefore, it cannot be considered merely a welcome convenience for moderate drinkers.

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