

## **Ministry of Social Affairs and Health**

Department for Safety, Security and Health

### **Draft Act amending the Alcohol Act**

#### **Impact assessment of the proposal**

##### **1. Background**

Prime Minister Petteri Orpo's Government Programme (20 June 2023) states, among other things, that Finland's economic and productivity growth have been slow for a long time. The Government's objective is to promote fair and open competition. The Government has outlined that it will continue to open the market in a determined and responsible manner, create conditions for growth in the domestic market, and increase the wellbeing and freedom of Finns.

In this respect, the agreed Government Programme includes a number of measures related to opening up the alcohol market and increasing competition.

The preparation of this proposal is part of the implementation of the entry agreed in chapter 6 ('A formula for growth') of the Government Programme, according to which the Government will reform Finland's alcohol policy responsibly in a European direction and build on the overall reform of the Alcohol Act carried out in 2018. According to the entry, the government-owned alcohol company Alko and domestic licensed retailers will also be allowed to sell alcohol online, and other retail distribution and collection options will also be permitted, subject to the safeguarding of age limit controls. Domestic sales for home delivery would comply with the derogations for craft breweries, small breweries and farm wines, taking into account the existing strength limits for domestic retail sales.

The proposal has been drafted by the Ministry of Social Affairs and Health as part of official duties.

##### **2. Current status and proposed amendments**

The current section 6, subsection 2, and section 26 of the Alcohol Act provide for the exclusive right of Alko to the retail sale of alcoholic beverages, one of the exceptions to which is the retail sale of lower strength alcoholic beverages to consumers by grocery stores and restaurants, for example.

The objective of the Alcohol Act is to reduce the consumption of alcoholic substances by limiting and controlling the related business activities in order to prevent harm caused by alcohol to its users, to other people and to society as a whole.

The Alcohol Act is structured on a licensing system that allows control of the trade in alcoholic beverages, from their manufacture through wholesale to retail sale and the serving of such beverages on licensed premises. The current rules have made possible effective official controls and have ensured that alcohol is not sold contrary to section 37 of the Alcohol Act. The sale of alcohol at a licensed retail outlet has ensured that alcohol is not sold to, for example, minors or highly intoxicated people. In addition, efforts have been made to reduce the consumption of alcoholic substances, for example by regulating the times during which alcohol can be sold.

The current legislation does not allow the delivery of alcoholic beverages from a retail outlet or the government-owned alcohol company Alko to a location indicated by the purchaser. Provisions would be

added to the Alcohol Act on the delivery of alcoholic beverages from domestic retail outlets directly to the recipient. At the same time, some minor or technical amendments would be made to the Act.

### **3. Solution options**

#### **3.1 Delivery of alcoholic beverages with a retail sales licence**

As an alternative to the amendment now proposed, a regulatory model was considered which would only allow the delivery of alcoholic beverages by the retail licence holders referred to in the Alcohol Act. The alternatives considered included a model where delivery would automatically be covered under the retail licence, without any separate application for a delivery licence. Another option considered was a model where only retail licence holders could apply for a licence for the delivery of alcoholic beverages. In this case, the licence would have been applied for either as a modification to an existing retail licence or in conjunction with an application for a new retail licence.

It was recognised at the preparatory stage that including the possibility to deliver alcoholic beverages in the retail licence would entail the least extensive change to the current licensing system under the Alcohol Act. The model would ensure that the ability of alcohol traders to meet their obligations would be verified at the licence application stage, and their data would be included in the register for official controls. Responsibility for the operations and compliance with the law would clearly lie with the licence holder, who would also have the practical means to supervise the work of their staff based on their rights as manager. Under this model, the necessary changes to the alcohol trade register and their attendant costs would be the least burdensome. Similarly, the scope of official controls and the number of persons subject to such control would be unlikely to increase significantly, as it is not thought that the number of operators licensed for retail sales would change significantly with this option.

Of all the regulatory options, this would probably not have required such extensive changes to the alcohol laws as the other options assessed. The adverse effects of the change enabling the delivery of alcoholic beverages would also probably have been the least severe under this option. On the other hand, this regulatory option would probably make it almost impossible for newcomers to enter the market to the same extent as the option chosen, and would thus be less effective in achieving the underlying objective of the regulation.

Enabling the delivery of alcoholic beverages is driven in particular by the Government's goal to promote fair and open competition. The Government's aim is to create conditions for the growth of the domestic market and for boosting the wellbeing and freedom of Finnish citizens. The Government also intends to continue to open up the market purposefully and responsibly. The Government also aims to reform alcohol policy responsibly in a European direction. At the preparatory stage, it was felt that including the licence for the delivery of alcoholic beverages in the retail licence would not be as effective as the regulatory option chosen in terms of achieving the objectives of the Government and of the proposed amendment to open up the market and promote fairer and more open competition. In the preparation of the draft Act it was thought that, even if the adverse effects of this option were likely to be less severe than those of the regulatory option chosen, the positive effects of regulation would also be less apparent than with the chosen option. In addition, including the delivery licence in the retail sale licence would not make it possible for newcomers to enter the market and, therefore, the regulatory option now chosen will do more to promote the freedom of enterprise than this option.

#### **3.2 Delivery licence for alcoholic beverages only to home and business addresses**

An alternative that would otherwise be in line with the proposed regulation was considered at the preparatory stage, but under this option, alcoholic beverages could only have been delivered to home and business addresses. Alcoholic beverages could have been ordered for delivery in line with the proposed amendment, but delivery would have had to be to a fixed home or business address and thus beverages could not be ordered for delivery to public places, for example.

At the preparatory stage, it was assessed that this regulatory option would have successfully achieved the purpose and objective of the Alcohol Act, but would not have met the stated objective of the Government programme as well and as broadly as the chosen regulatory option. On the other hand, this regulatory option might have more successfully minimised any possible rise in public disorder resulting from the delivery of alcoholic beverages, although, at the same time, it could have created confusion for suppliers of alcoholic beverages as regards the addresses to which alcoholic beverages would be allowed to be delivered and the addresses to which delivery would not have been allowed.

### **3.3 Delivery of alcoholic beverages as an activity subject to notification**

Another option assessed in the preparatory stage was a model whereby operators carrying on the delivery of alcoholic beverages would be required to submit a notification to the authorities prior to the start of delivery operations. The advantage of this model would be that, as with retail licence holders, operators delivering alcoholic beverages would also remain on the official register. On the other hand, in the case of operations subject to notification, there would be no assessment of the operational prerequisites for operators carrying on the delivery of alcoholic beverages, i.e. there would be no prior control by the authorities. Under this regulatory option, the number of operators, and thus the number of operators to be monitored by the authorities, would be likely to increase more, and conversely, it would be more difficult to address illegal activities than under the regulatory option chosen. On the other hand, this model would make it easier for traders to start an alcoholic beverage delivery service than the option chosen and would thus open up competition to a greater extent, which would be in line with the Government's objectives. However, it was thought at the preparatory stage that the problems involved in monitoring activities subject to notification and in dealing with illegal activities, as well as the potential harmful effects of alcoholic beverages, would be significantly greater with this option than with the chosen model. The model chosen also serves the purpose and objectives of the alcohol legislation more effectively than this regulatory option.

### **3.4 Delivery of alcoholic beverages without a licensing or notification procedure**

The assessed options also included a model where the delivery of alcoholic beverages would not require either notification to the authorities or an application for a separate licence. This would be the least onerous model for traders and would allow all operators free access to the market.

With this regulatory option, operators engaged in the delivery of alcoholic beverages would not be included in the official register or the licensing system and would not be subject to an examination of the general requirements for obtaining a licence. In such a case, operators that would not be able to obtain a licence under the Alcohol Act could also start to offer a delivery service. Nor would there be any restriction whatsoever on the number of operators offering delivery, and not even the retailers of alcoholic beverages, let alone the public authorities, would necessarily have any knowledge of operators involved in delivery or the legality of their activities. The risk of greater alcohol-related harm and an increase in the grey economy would be largest with this regulatory option compared with the other regulatory options assessed.

It was concluded during the preparatory stage that a regulatory option allowing alcoholic beverages to be transported freely to customers by anyone at all would call into question the licensing system under the present alcohol legislation and would also blur the boundaries of activities subject to licence. It was also highlighted during the preparatory stage that the prohibition on acting as an agent for remuneration, deemed an alcohol-related offence in the Criminal Code of Finland, would be rendered meaningless in practice as a result of this regulatory option. In this option, doubt would also be cast on the legitimacy of the licensing system under the alcohol-related laws if the supply of alcoholic beverages on licensed premises and at retail outlets were subject to a licence but the same requirement would not apply to deliveries, where studies nevertheless suggest that the risk of being in breach of the prohibitions on supply is higher than on licensed premises and at retail outlets.

In the preparation of the draft Act, it was estimated that the disadvantages of this regulatory option would outweigh the benefits, nor would the option be acceptable from the perspective of the purpose and objective of the Alcohol Act.

#### **4. Comments from stakeholders**

The proposal has been agreed between the government parties in the Government Programme, but comments from stakeholders on its implementation have not yet been requested. The proposal is to be circulated for comment on 5 July 2024.

#### **5. Assessment of the impact of the preferred option**

##### **5.1 General**

The production, sale and marketing of alcoholic beverages generates over EUR 1 billion in tax revenue for society, billions of euro in business income for various enterprises, and earned income for people involved in the production, sale and marketing of alcohol. On the other hand, alcohol consumption costs society, businesses and individuals billions of euro, both directly and indirectly.

Online sales and deliveries of alcohol are relatively new phenomena in the alcohol trade. The COVID-19 pandemic boosted online sales of alcoholic beverages worldwide and the restrictions on online sales and deliveries were relaxed in several countries during the pandemic to improve business conditions in exceptional circumstances. Online sales and deliveries of alcoholic beverages as new distribution channels pose new challenges to compliance with, and the control of, responsible alcohol retail sales. Alcohol is not an ordinary consumer product: it causes a wide range of social and health problems for consumers.

As online sales and deliveries of alcohol are still relatively new phenomena, only a limited number of articles on delivery (or home delivery) have been published in the international scientific literature. In early 2024, the Finnish Institute for Health and Welfare (THL) compiled the existing research and experience data on the impact of home delivery of alcoholic beverages (in this bill, the delivery of alcoholic beverages would include home delivery) in a research publication (the Tutkimuksesta tiivistä series)<sup>1</sup>. It was also possible to make use of this knowledge base in the impact assessment of this draft.

There are no direct research data on whether the delivery of alcoholic beverages affects the overall volume of alcohol consumption at the level of the individual or society. In online trade, consumers may tend to spend more money on alcohol at one time than in a shop, and having large volumes of alcohol in the home

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<sup>1</sup> Mäkelä, P & Warpenius K (2024) Alkoholi juomien kotiinkuljetus – tietopohjaa sääntelystä ja vaikutuksista (Home delivery of alcoholic beverages - knowledge base on regulation and impact). Tutkimuksesta tiivistä 11/2024. Finnish Institute for Health and Welfare, Helsinki

may increase consumption. It is also known that the price of alcoholic beverages has an impact on consumption and the delivery of alcohol may make it easier to acquire alcohol, by saving time, for example. Furthermore, the effort involved in purchasing alcoholic beverages can be seen as a part of the total cost of the drink to the consumer<sup>2</sup>. The ease of ordering the goods could therefore increase the consumption of alcoholic beverages by some consumers. In the future, most of the alcohol consumed would be likely to be purchased in physical outlets and the share of alcohol purchased for delivery would probably be relatively small. Thus, the bill would in all likelihood have implications for a relatively small share of total alcohol consumption and therefore its impact on the overall consumption of alcohol at the level of society is estimated to be somewhat limited. At the level of the individual, the delivery of alcoholic beverages, especially through express delivery, could have an impact in particular on the risks associated with alcohol and binge drinking, and thus on alcohol-related harm. The impact of the bill on alcohol-related harm is described in more detail mainly in the section 'Impact on wellbeing and health'.

The proposal would have the desired positive economic effects as it would promote opportunities for consumption by consumers and business opportunities for operators selling alcoholic beverages on the market by enabling the delivery of alcoholic beverages. Although the proposal would also increase the regulatory burden for enterprises, overall the proposal would help promote business. At the same time, the proposal could also have the effect of leading to a small increase in alcohol-related harms and associated costs. However, the significance of the disadvantages varies, depending on whether they are examined at the level of the individual, the community or society. At the level of society, the impact of the bill on alcohol-related harm would most likely be fairly minor, but for some individuals or communities it could be significant.

The Government Programme of Prime Minister Petteri Orpo states several objectives in relation to the alcohol market. The Act amending sections 17 and 26 of the Alcohol Act (HE 7/2024) entered into force on 10 June 2024. The Act allows fermented alcoholic beverages with a higher alcoholic content than previously allowed to be sold by licensed retailers. The amendments to the excise duty on alcoholic beverages (HE 37/2023); which took effect as from January 2024, will reduce the tax on beer and increase the alcohol tax on wines and other fermented beverages containing more than 5.5 % alcohol by volume, intermediate products and ethyl alcohol beverages. At the level of society, this bill is not expected to lead to any significant effects in combination with other changes in the alcohol market that have already been implemented, as it is thought that it will have a limited impact on alcohol consumption. From a business point of view, the proposal continues to promote the objectives of the Government Programme regarding fair and open competition.

## **5.2 Economic impacts**

### *Impact on public finances*

As described above, there is no direct research evidence related to the effect of the delivery of alcohol on alcohol consumption and, in general, the impact of the proposal on overall alcohol consumption is thought to be minor. Nevertheless, the proposal may have implications for public finances with respect to its impact on the revenue from alcohol consumption and the costs incurred. Alcohol places a major burden on social and health care. If the bill were to increase overall consumption of alcohol or alcohol consumption among heavy drinkers, it could also have a greater impact on the costs of social and health care incurred in treating alcohol-related harm. At the same time, if the proposal were to increase alcohol consumption, this could also have the effect of slightly increasing the tax revenue from alcohol.

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<sup>2</sup> Stockwell T, Gruenewald PJ. (2004) Controls on the physical availability of alcohol, The essential handbook of treatment and prevention of alcohol problems. West Sussex: John Wiley & Sons, 213-33.

The proposal could have an impact on the accrual of tax revenue from alcohol if it were to result in a situation where some foreign online purchases switched to a domestic online store. An estimated 0.7 million litres of alcohol were bought online from abroad in 2023 in terms of 100 % proof alcohol<sup>3</sup>. The amount of tax revenue from these online purchases is estimated at around EUR 30 million. The amount of tax reflects the estimated tax deficit, i.e. the amount of duty on alcohol that should have been paid on these online purchases. However, there would be no corresponding increase in the accrual of tax revenue if, for example, all online sales of alcoholic beverages could be strictly controlled and taxed. Tax has not currently been paid in Finland on most online purchases, as currently the alcohol duty has already been paid, either by the sellers or buyers, in accordance with the regulations, in the amount of approximately EUR 1 million per annum. On the other hand, since the vast majority of customers who make their purchases from foreign online stores are doing so with the aim of buying alcoholic beverages at the lowest possible prices, it is unlikely that a significant number of these buyers would switch to a domestic online store. The impact of the proposal on the accrual of tax revenue from alcohol in this way too is thought to be minor.

The direct budget impact of the proposal would be on the appropriations set aside by the authorities enforcing the Alcohol Act. The proposal would increase the workload and costs of the authorities enforcing the Alcohol Act, i.e. the Regional State Administrative Agencies and the National Supervisory Authority for Social Affairs and Health (Valvira), because a completely new licence for the delivery of alcoholic beverages would be subject to control. The proposal would allow the Regional State Administrative Agencies to charge control fees to cover the increased workload.

### *Impact on business*

In general, the proposal would boost the functionality of the market and competition by allowing the delivery of alcoholic beverages from all holders of licences for the delivery of alcoholic beverages. A licence for the delivery of alcoholic beverages could be obtained, under the conditions laid down in the proposal, by all the holders of a retail licence, the government-owned alcohol company Alko and, for example, transport and food delivery services. The delivery of an alcoholic beverage would be subject to the condition that the alcoholic beverage has been purchased from a retail sales outlet or the government-owned alcohol company Alko. The proposal would therefore also boost business opportunities for domestic operators lawfully selling alcoholic beverages. In addition, the proposal would equalise the status of domestic operators in relation to foreign alcohol sellers, since, in the past, it was possible to purchase alcohol for delivery from foreign alcohol sellers under certain conditions, but not from domestic alcohol sellers.

Grocery stores are the largest sales channel for alcohol in Finland. In 2023, almost 50 % of alcohol consumption included in statistics was purchased from retail sales outlets other than Alko, i.e. grocery stores, kiosks and service stations. Buying food online has grown in popularity in recent years, accounting for 2.7 % of grocery sales in 2024<sup>4</sup>. Until now, consumers have not been able to order alcoholic beverages online when ordering food. The bill would allow consumers to do all their grocery store shopping for delivery via an online platform, which could contribute to the growth of online grocery sales. While some businesses in the grocery trade would probably supply alcoholic beverages themselves, a significant number of them could also rely on external transport companies to deliver alcoholic beverages.

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<sup>3</sup> Passenger imports and online purchases of alcoholic beverages 2023. Statistical Report 10/2024 of 1 March 2024. THL. <https://thl.fi/tilastot-ja-data/tilastot-aiheittain/paihteet-ja-riippuvuudet/alkoholi/alkoholin-matkustajatuonti-ja-verkko-ostaminen>

<sup>4</sup> PTY ry (Finnish Grocery Trade Association). (27 March 2024). Grocery sales and market shares 2023. <https://www.pty.fi/blog/2024/03/27/paivittaistavarakaupan-myynti-ja-markkinaosuudet-2023/>

The bill could also boost business opportunities for restaurants. The supply of alcoholic beverages could be exploited, in particular, by restaurants licensed to sell alcohol, which currently deliver food to customers themselves or which have entered into a transport agreement with another company. If the restaurant were to deliver alcohol itself to the customer, a licence for delivering alcoholic beverages would be required. If alcoholic beverages were delivered by another company, such as a food delivery service, that other company would be required to have an alcohol delivery licence.

A member of staff of a holder of a licence for the delivery of alcoholic beverages who is the person delivering the alcoholic beverage will be required to have received training in the delivery of alcoholic beverages (alcoholic beverage delivery passport). The alcoholic beverage delivery passport would be similar in principle to the current passport for serving alcohol. An alcoholic beverage delivery passport would incur minor costs for companies delivering alcoholic beverages in terms of direct training expenses and, for example, stand-in arrangements. The direct cost of the delivery passport test would probably be in tens of euro per person taking the test. The tests for the passport for serving alcohol, for example, currently cost between EUR 30 and EUR 60.

Companies carrying on the delivery of alcoholic beverages would incur costs for applying for a delivery licence. In addition, holders of a delivery licence would be charged an annual control fee. The costs of applying for a licence, as well as the annual control fees, could discourage some small operators from applying. The bill would propose that the control fee for the delivery of alcoholic beverages be set at EUR 100 for every licence holder. Applications for a licence to deliver alcoholic beverages should be made by operators with a sufficient volume of deliveries of alcoholic beverages and revenue from such business operations in relation to the costs of applying for the licence. Operators currently selling alcohol lawfully and who would not themselves start delivering alcoholic beverages under the proposal would be able to use a transport or food delivery service with a delivery licence to deliver alcohol. However, it is unclear as to how some food delivery services, in particular, in Finland would be required to organise matters regarding the delivery licence. Currently, some food delivery services in Finland use self-employed entrepreneurs for transport arrangements, and, under the conditions laid down in the bill, these independent traders would themselves have to apply for a licence to deliver alcoholic beverages. However, the costs to self-employed entrepreneurs in terms of licence and control fees related to applications for a licence could be large in relation to the income earned.

### *Impact on the authorities*

Supervision of the retail sale and serving of alcoholic beverages and their advertising is the responsibility of the National Supervisory Authority for Welfare and Health (Valvira) and the Regional State Administrative Agencies. Under the proposal, Valvira and the Regional State Administrative Agencies would also supervise the delivery of alcoholic beverages. Operators carrying on deliveries of alcoholic beverages would have to apply to the Regional State Administrative Agency for a licence to deliver alcoholic beverages.

In Finland in early 2024, there were around 4 200 valid alcohol retail licences, some 490 Alko stores or collection points and around 9 900 valid licences to serve alcohol. Approximately 1 400 holders of a licence to serve alcohol also had a licence for the retail sale of alcohol. The bill would increase the number of sites to be monitored by the authorities and there would thus be a need to increase the resources of the supervisory authorities. A large number of the applicants for a licence to deliver alcoholic beverages may not necessarily already have an alcohol retail licence. The delivery of alcoholic beverages as a new licensing process would significantly increase the workload of the licence administration, at least upon entry into force of the Act, but also as an additional regular and permanent licensing task.

The bill would increase the number of sites to be monitored by the supervisory authorities and there would thus be a greater need to increase their resources. While there were previously some 14 500 locations serving alcohol or retail outlets monitored by the relevant authorities, there will now be a virtually unlimited number of delivery points for alcoholic beverages to be monitored. Valvira would continue to act as the steering authority for the enforcement of the Alcohol Act, thereby also being responsible for the control of the delivery of alcoholic beverages throughout the country. Similarly, the Regional State Administrative Agencies would control the delivery of alcoholic beverages in their respective regions. Official controls of the delivery of alcoholic beverages would be carried out in part by means of test purchases, which is a completely new form of official control in Finland in connection with the sale of alcohol. This would require the establishment of new operating procedure. It would also lead to a temporary increase in the need for resources for monitoring. Valvira would have the new task of being responsible for the supervision of educational establishments in connection with the delivery passport test.

The Regional State Administrative Agencies would cover the costs of control of the delivery of alcoholic beverages by means of the control fee. A corresponding control fee would also be payable by holders of a retail licence and a licence to serve alcohol. The proposal would also have an impact on the work of Valvira and on the information systems necessary for the control of alcohol. Licensing of the delivery of alcoholic beverages would therefore require changes to the existing alcohol trade register, the relevant e-services and application forms. The changes to the alcohol trade register and e-services, the actual processing of licensing applications, the monitoring of the sites and supervision on the part of the Regional State Administrative Agencies would all require additional resources. The licence and control fees are intended to provide the Regional State Administrative Agencies and Valvira with additional permanent resources amounting to approximately EUR 400 000, corresponding to approximately five person-years, to control and supervise the delivery of alcoholic beverages. The ministries responsible for the performance management of the agencies would allocate a similar amount in appropriations to the Regional State Administrative Agencies and Valvira. For the additional resources, an appropriation of EUR 80 000, corresponding to one person-year, would be allocated to Valvira, and an appropriation of EUR 320 000, corresponding to four person-years, would be allocated to the Regional State Administrative Agencies. In addition, Valvira would be offered one-off additional resources amounting to EUR 375 000 for changes to the alcohol trade register.

The proposal could also have implications for the work of the police. Alcohol is the most common factor behind violence and accidents, including serious ones. Alcohol consumption, in particular binge drinking, increases the risk of both committing and becoming a victim of a violent crime. In 2023, the police responded to approximately 224 000<sup>5</sup> critical alcohol-related incidents. The bill could increase the incidence of public disorder and push up the crime rate, giving the police more to do. In particular, they would have to respond to more domestic disturbances if consumption of alcohol in the home environment increases as a result of the bill. On the other hand, alcohol-related disturbances occur mainly during the evening and night. Since the delivery of alcoholic beverages would only be permitted between 09:00 and 21:00, the bill would be unlikely to have a significant impact on the work of the police at night.

The bill would mean that alcohol could also be delivered to locations where its consumption is prohibited. For example, under section 4 of the Public Order Act (612/2003), it is prohibited to use intoxicating substances in public places in a built-up area, at a border crossing point as referred to in the Border Guard Act (578/2005) and in a vehicle used for public transport, with the exceptions referred to in subsection 2 of that section. The proposal could make it more difficult for the police to enforce these provisions.

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<sup>5</sup> The alcohol-related incidents and police tasks referred to here are physical abuse and assault, disturbances in the home, disorderly behaviour and violence, drink driving and intoxication.



The bill would allow educational establishments to offer delivery passport tests, with the persons sitting the test receiving a delivery passport certificate. The delivery passport would be an indication of the competence of the person delivering the alcoholic beverage. Educational establishments would be entitled to charge a fee for the test. In general, the number of persons sitting the test would depend on the number of companies applying for a licence to deliver alcohol. For any one company applying for a delivery licence, the number of employees sitting the test could be anything from a single individual to dozens of people. There would probably be high demand for the delivery passport tests immediately following entry into force of the Act.

#### *Impact on the position of households and consumers*

While regular consumption of alcohol by Finns has decreased, 48 % of men and 22 % of women consumed alcohol at least once a week in 2023. Teetotallers accounted for 12 % of the population in 2023<sup>6</sup>. The reform would benefit the significant number of Finns who consume alcohol, as the purchase of alcoholic beverages would not require their presence at the physical point of sale of the seller of alcohol. Consumers ordering deliveries of alcohol would save the time and money spent on shopping trips. On the other hand, a significant number of Finns would continue to buy their alcoholic beverages at a physical point of sale. The delivery of alcohol to the consumer would be likely to be easiest and cheapest in densely populated areas, where organising deliveries is more economical. In these areas, the distances to the nearest store or Alko outlet are still mainly short.

### **5.3 Other impacts on people and society**

#### *Impact on wellbeing and health*

In Finland, the number of people dying from alcohol-related diseases and alcohol poisoning, relative to the population, is more than three times higher than in Sweden and Norway. Alcohol is also a background factor in many diseases. Linked to alcohol consumption is a significant increase in the risk of developing cancers of the oral cavity, larynx, throat, oesophagus and liver, and a slightly increased risk of breast and colon cancer. For example, alcohol already increases the risk of breast cancer at low levels of consumption and the risk grows in proportion to greater alcohol consumption. Although overall consumption of alcoholic beverages and consumption levels associated with risk have decreased steadily over the past decade, high-risk consumption of alcohol in Finland remains common.

The scientific literature suggests that online purchases and deliveries of alcohol (in the studies the term used is *home delivery*) are associated with users of alcohol at more than average risk<sup>7</sup>. However, it is possible that high-risk alcohol consumers are more likely to buy online compared with other consumers, rather than that online shopping as such leads to increased consumption of alcohol by those ordering it. However, the bill may have an adverse impact on alcohol-related harms, especially among those who already drink heavily.

Many people with alcohol problems have needed to be fit to drive to purchase alcoholic beverages, which would no longer be the case if alcoholic beverages can be delivered. If meeting the legal conditions for the

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<sup>6</sup> Finnish alcohol consumption patterns 2023. THL Statistical Report 59/2023, 30 October 2023.

[https://www.julkari.fi/bitstream/handle/10024/147677/Tilastoraportti\\_59\\_2023\\_Suomalaisten\\_alkoholink%C3%A4ytt%C3%B6tavat\\_2023\\_s.pdf?sequence=1&isAllowed=y](https://www.julkari.fi/bitstream/handle/10024/147677/Tilastoraportti_59_2023_Suomalaisten_alkoholink%C3%A4ytt%C3%B6tavat_2023_s.pdf?sequence=1&isAllowed=y)

<sup>7</sup> Coomber K. and Others (2023) Characteristics of high and low-risk drinkers who use online alcohol home delivery in Western Australia. Drug and Alcohol Review, 1-9.

delivery of alcoholic beverages cannot be sufficiently ensured, there is a risk that alcohol consumption among those addicted to alcohol will increase if it is no longer necessary to be occasionally sober to acquire alcohol. In general, it is far more difficult to assess the state of intoxication at the time of the delivery of alcoholic beverages, as the person who delivers the beverages is not able to check for signs of intoxication in the same way as in a store.

Indeed, the supply of alcoholic beverages may lead to prolonged drinking sessions among some people and to the consumption of large quantities of alcohol in connection with an order<sup>8</sup>. In a study carried out in Australia, this problem has been linked in particular to express orders. Callinan et al. (2023)<sup>9</sup> have pointed out that express deliveries may heighten impulsivity where it concerns the consumption of alcohol, and this is a key factor for high-risk alcohol consumption and related harms. On the other hand, the bill would limit the supply of alcoholic beverages to between the hours of 09:00 and 21:00. This would prevent, in particular, orders of alcoholic beverages made on impulse very late in the evening. In particular, binge drinking among Finns (five or more units) often occurs in the evening. In all, 74 % of the binge drinking sessions in Finnish homes (occupants aged 20–79) took place outside the time between 09:00 and 21:00<sup>10</sup>.

As described above, the key risks associated with the bill in connection with increased alcohol-related harms relate in particular to prolonged drinking sessions and a rise in the number of units consumed at any one time, which may be seen to be linked in particular to express orders. These risks are thought to be particularly evident among those who are already heavy drinkers. Men suffer from severe alcohol problems far more frequently than women. It is therefore likely that if home deliveries were to cause more alcohol-related harms, more men than women would experience these additional problems. Efforts to contain the risk include regulation, licensing and official controls related to the delivery of alcoholic beverages. In particular, the extent to which the delivery of alcoholic beverages complies with the prohibition in the proposal regarding the supply of alcohol to intoxicated persons is of particular importance in order not to make alcohol more readily available to intoxicated persons as a consequence of the bill.

Alcohol is also a major background factor in domestic violence. If the bill were to lead to an increase in alcohol consumption, especially in the home, the risk of increased domestic violence could also be expected to increase. Women suffer from domestic violence more often than men. The perpetrator of domestic violence is intoxicated in just under half of violent situations, and the consequences of alcohol-related domestic violence are often more serious than those of such incidents where no alcohol is involved. In Finland, changes in alcohol consumption levels are linked to an increased trend in violent crime, so that, although the bill is unlikely to have a major impact on consumption, it is also not likely to reduce the incidence of alcohol-related domestic violence.

### *Impact on children and young people*

In Finland, alcoholic beverages are most usually consumed in the home (one's own or someone else's home or some other private space)<sup>11</sup>. The bill could lead to an increase in alcohol consumption, especially in domestic surroundings. Finland currently has an estimated 65–70 000 children (accounting for around 6 % of minors) one or both parents of whom have a substance abuse problem. At the age of 13–17, the risk of mental health issues in children with parental substance abuse is approximately one and a half times

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<sup>8</sup> Colbert S. et al (2023) Cross-sectional survey of a convenience sample of Australians which use alcohol home delivery services. *Drug Alcohol Rev.* 42, 986-995

<sup>9</sup> Callinan S. et al. (2023) In order to assess the impact of home delivery expansion within Australia, researchers need regulators to collect and share data on sales. *Drug Alcohol Rev.* 42, 1309-1311.

<sup>10</sup> Information based on the THL 2023 Drinking Habits Study data

<sup>11</sup> Mäkelä P. et al. (2023) Drinking in the home: what does it entail for younger and older Finns? *Drug and Alcohol Review* 42, 1004-1012.

greater than among children whose parents have no such problem, and the risk of harmful substance abuse is twice as high. However, the adverse effects of alcohol on children and adolescents are not linked merely to the children of parents who are seriously dependent on intoxicants. In many families, high-risk alcohol consumption is also common. In families where the risk is high there is additionally an increased risk of feelings of insecurity among children and adolescents, and they may be prone to various states of fear and suffer from a lack of care. If the use of alcohol in the home increases as a result of the bill, especially in families where a parent has a drinking problem or is at risk concerning alcohol consumption, the wellbeing of the children in such families may also suffer.

In Finland, one of the key factors contributing to the decline in alcohol consumption among young people has been their difficulty getting hold of it<sup>12</sup> i.e. in practice, more effective age-limit checks. Both private retail outlets and the Alko stores stepped up age-limit checks just prior to the 2010s. According to the scientific literature on the delivery of alcoholic beverages (referred to in the literature as home delivery of alcoholic beverages), the main problem with responsible sales and sales controls in the delivery of alcoholic beverages relates to the checking of age limits. However, the proposal would provide that the delivery of alcoholic beverages should, where appropriate, be subject to a verifiable age check of the recipient and that alcoholic beverages should not be made available to anyone under 18. However, if age verification checks are not effectively implemented, the delivery of alcohol may make alcohol more readily available, especially to young people.

In a study conducted in Australia, express orders were particularly common among people under the age of 25. As a result, express orders can lead to prolonged drinking sessions and an increase in the quantities of alcohol consumed at any one time, especially among young people. On the other hand, the bill would not allow deliveries after 21:00, which would prevent express orders from being placed late in the evening and drinking sessions from running late into the evening and night. Around 60 % of the drinking sessions of young people (aged 20-34) in the home also took place outside the time between 09:00 and 21:00. In all, 90 % of drinking sessions in the home among young people, and where binge drinking took place, ended outside the hours between 09:00 and 21:00.

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<sup>12</sup> Raitasalo K and et al. (2018) What is going on in underage drinking? Reflections on Finnish ESPAD data. Drug and Alcohol Review 37, 76-84.