

To the European Commission: Notification 2023/0543/FI – Proposed Amendments to Finland's Alcohol Act

The Nordic Alcohol and Drug Policy Network (NordAN) would like to formally express its concerns regarding the proposed legislative changes to Finland's Alcohol Act, as specified in notification 2023/0543/FI.

NordAN, committed to fostering public health-focused alcohol policy across the Nordic region, stands in agreement with the analysis presented by our member organization, EHYT ry. The potential impacts of the proposed amendments on public health and societal wellbeing necessitate a rigorous examination before their enactment.

Finland's state alcohol monopoly, Alko, has been integral to the country's effective strategy in reducing alcohol-related harms, maintaining levels significantly lower than the majority of European nations. The alcohol monopoly's approach to responsible sales, including controlled outlet distribution, has been critical in preventing normalized excessive alcohol consumption.

The body of research shared by EHYT ry clearly indicates that increased availability of alcohol through liberalized retail sales correlates with a rise in consumption and consequent social and healthcare costs. The proposed shift of revenue generation from the state-controlled monopoly to supermarkets suggests a tendency towards prioritizing economic gain over long-term public health.

The proposed elevation of the retail license alcohol by volume (ABV) limit from 5.5% to 8% ABV is of particular concern. Such a policy change would not only enhance the accessibility of alcohol but also diverge from the conservative approach typical of Nordic countries and the preventative objectives of the Finnish Alcohol Act. The absence of justifiable grounds for differentiating treatment of fermented products within the proposed amendments is inconsistent with public health objectives.

Also, the proposed changes to the taxation of alcoholic beverages, which align with the domestic production statistics—favouring the beer industry where approximately 90% of consumption is domestically produced over wine, with only about 2% produced within Finland—raises questions.

NordAN supports EHYT ry's call for a comprehensive health impact assessment to consider the potential societal impacts before the legislative changes carefully. The European Commission's review process must uphold a balanced and evidence-informed analysis while respecting the autonomy of member states, with the health and wellbeing of citizens being the paramount concern.

To conclude, NordAN urges to maintain Finland's historically balanced and effective alcohol policy. The primary objective of the Alcohol Act is the protection of public health, a goal that commercial considerations should not eclipse. The role of the Finnish alcohol monopoly in regulating alcohol outlet density and availability is crucial and should be preserved in alignment with the Nordic model and the World Health Organization's best practices.

NordAN recommends that a thorough and comprehensive evaluation be conducted before the implementation of any amendments to ensure that Finland continues to prioritize public health within its Alcohol Act.

Submitted by:

Nordic Alcohol and Drug Policy Network (NordAN)