

Framework to strengthen implementation of the WHO European Action Plan to Reduce the Harmful Use of Alcohol (EAPA), 2022 – 2025

Comments prepared by World Cancer Research Fund International

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Comment on the overall document

World Cancer Research Fund International strongly welcomes the Framework to strengthen implementation of the WHO European Action Plan to Reduce the Harmful Use of Alcohol (EAPA), 2022 – 2025 and appreciates the opportunity to provide comment. As an organisation focused on cancer prevention and survivorship related to diet, physical activity and alcohol, there is strong evidence that there is no safe level of alcohol consumption in relation to cancer risk. Alcohol consumption is [linked to at least six different types of cancer](#).

As there is no safe level of alcohol consumption for cancer risk, we strongly recommend that the phrase harmful use is not used in the Framework, given that implies that there are safe levels of alcohol consumption. As such, we strongly recommend that the 20% reduction target on harmful use of alcohol is changed to a 20% per capita reduction of alcohol consumption across the region.

We support the vision and values of the Framework; however, we also encourage the addition of a “prevention first” value as we strongly promote the investment in healthy populations as the best way to reduce the risk of cancer.

We welcome the general tone and language of the document, particularly its references to the close link between alcohol and cancer and its address of corporate predatory behaviour. Safeguarding policy processes from conflict of interest and undue influence needs to be exemplified throughout the framework. We also believe that there should be a focus throughout the document on socioeconomic inequalities, and the rights of individuals and communities – not just children – to be protected from alcohol industry activities and have both physical and virtual alcohol-free social spaces.

The focus areas are appropriate and we particularly support policy actions included in the NCD Best Buys pertaining to pricing, availability and marketing restrictions. We commend the strong focus of labelling to indicate harm related to alcohol and fully support recommendations to Member States to implement health warning labels and raise awareness on alcohol links to cancer.

However, we make several suggestions which we believe will further strengthen action and support Member States in reducing alcohol consumption which are outlined in the sections below. We believe each of the focus areas would benefit from the development of normative guidance and minimum standards to support Member States develop appropriate policy responses.

Comment on specific areas

Focus Area 1 - Pricing

We appreciate the thoroughness of this section and encourage further strengthening of pricing as the most effective and cost-effective intervention. We welcome the focus on cross-border issues both in actions for Member States and WHO Europe (as enablers of dialogue), however we feel some more guidance and specificity can be provided on how cross-border issues can be overcome, whilst giving WHO a stronger role at negotiation processes.

Recommendations for Member States

We welcome the inclusion of regular reviews of affordability and that taxation levels are adjusted to inflation. We suggest all other pricing policies including Minimum Unit Price (MUP) be adjusted to inflation. We would also encourage Member States to implement fiscal measures across all unhealthy commodities, utilising public health-oriented fiscal policy to shape environments in a comprehensive way, thus including alcohol taxation with sugar-sweetened beverages and tobacco as part of an integrated approach.

Action for WHO Europe

We support suggestions for an Inter-agency initiative for alcohol taxation development. We believe WHO Europe should carry the flag of alcohol control policy in broader discussions over tax systems reform and efforts to prevent tax avoidance and tax evasion (as recommended in NCD Best Buys). We also suggest that WHO Euro lead the development of guidance on minimum standards of public health-oriented alcohol taxation.

Focus Area 2 – Alcohol Availability

Recommendations for Member States

We support recommendations in this area, particularly when an “healthy environments” approach is suggested to regulate consumption in outdoor public spaces, or restrict sales/consumption within transport or at sporting and cultural events where minors are

in attendance. However, we suggest this approach be made explicit by grouping recommendations for alcohol-free spaces into a single bullet point.

We would also suggest the inclusion in the recommendations to Member States that they consider requiring licence-holders to provide data on their alcohol sales to the national public health agency.

Action for WHO Europe

We strongly support WHO Europe taking on a more proactive role in sharing experiences and learning across Member States and help to identify best practice in controlling availability. We consider it would be helpful for WHO Europe to develop tools for Member States to help them utilise the evidence base and consider the questions they should consider in developing or improving national systems to control availability.

Focus Area 3 – Marketing

This section has a very strong core message, and we highly commend the use of language on predatory corporate behaviour when alcohol marketing in digital contexts is described. We suggest the purposes of this policy area are explicitly outlined: to protect children, vulnerable people, and recognise that marketing creates and sustains social norms around alcohol including the harms of the relationship a child creates with an alcohol brand from a young age. We also suggest that alcohol marketing is framed as a human right issue. We support the total ban of any alcohol advertising – including digital marketing, promotion and sponsorship and believe this WHO recommendation should be heightened in the text. A transnational approach to digital marketing restrictions is likely to be the most effective.

Recommendations for Member States

We suggest stronger language is utilised on actions towards internet platform companies, mandating them to restrict alcohol marketing, with accountability mechanisms set in place by regulation. Member States should not be encouraged to hold media companies accountable through voluntary schemes. Only mandatory marketing restrictions should be recommended.

Focus Area 4 - Health Information

We recognise that many people are unaware of the risks of developing a range of cancers due to alcohol consumption, even at very low levels. We strongly welcome WHO proposals for measures that mandate provision of health and nutritional information and lists of ingredients on all alcoholic beverage containers, including health warning labels. Alcoholic beverages should not be exempt from providing the same nutrition and ingredient information as non-alcoholic beverages. We fully support this

intervention to complement other policy actions within a comprehensive approach to reduce alcohol-attributable harm.

The framing however should be shifted away from individual choice, and we recommend replacing it with language about the right to understand the risk of alcohol consumption.

Recommendations for Member States

We welcome the Framework's reinforcement of the importance of label design and WCRF International strongly supports the addition of health warning labels to alcoholic beverages for its potential to educate about the cancer risks of consuming alcohol. There is strong evidence to suggest that alcohol intake increases the risk of at least six cancers, yet there is a significant lack of population awareness of this link.

We therefore support improved labeling of alcoholic beverages in the European region, and call to include the addition of a health warning label about the connection between alcohol and cancer risk, to help people make more informed choices and raise awareness. We also welcome nutrition and ingredient labelling including calories information; given that alcoholic beverages also provide significant calories and can contribute to excess weight. It is important to reinforce that health warnings should be a standard component on labelling, not a separate add-on. We therefore suggest strengthening the language and the recommendations to reflect that labelling and health warnings should be introduced together – complementarily - and not separately.

However, we do not support the recommendation of self-regulation and object to any wording around self-regulation being positioned as acceptable in certain occasions. We stress that self-regulation is a demonstrably ineffective policy approach, and language around voluntary measures should either be changed to mandatory or removed; with the invitation for public health agencies to engage with industry for counsel also to be removed.

Action for WHO Europe

We recommend that WHO Euro play a leadership role in understanding and strengthening the science related to health warning labels.

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