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Response of the Global Alcohol Policy Alliance
to WHO's Draft Global Strategy to the Reduce the Harmful Use of Alcohol
December 2009

In January 2010, the Executive Board of the World Health Organization will consider a Draft Global Strategy to Reduce the Harmful Use of Alcohol. This proposal comes none too soon, considering the enormous impact that alcohol has on global public health. The excessive use of alcohol is the third-leading risk factor for premature deaths and disabilities in the world, accounting for some 2.5 million deaths in 2004. That equates to 3.8% of all deaths and 4.5% of the global burden of disease as measured in disability-adjusted life years lost.

The Global Alcohol Policy Alliance (GAPA)* strongly supports the December 3, 2009 Draft Global Strategy and recommends it to the Executive Board and Member States for approval. Although some of its sections should be improved and strengthened (as indicated below), we believe that the Strategy effectively addresses issues that will be critical in public health efforts to reduce the toll of alcohol throughout the world. In particular, we note the following essential component strengths of the Strategy:

- Its foundation rests on strong, evidence-based policies that can provide guidance for Member States;
- It recommends, in accordance with the evidence base, essential policy interventions regarding price, availability, drink-driving countermeasures and marketing;
- It addresses the need for resource development and issue prioritization in implementing alcohol prevention strategies at the global and national levels;
- It recognizes that the involvement of civil society is essential in creating the political will to address alcohol issues and implement national and global prevention strategies;
- It acknowledges the responsibility for health-sector leadership within multi-sectoral collaboration on efforts to combat alcohol problems at all levels;
- It suggests a special focus on protecting the young, non-drinkers, and populations at risk from harmful use of alcohol, such as women, indigenous peoples and other low-income or minority groups; and
- It anticipates the involvement of all parties, including "economic operators," in implementing strategies at all levels, while pointing to reasonable distinctions in their roles, depending on commercial interests involved.

GAPA believes that the Strategy's **Aims and Objectives, Guiding Principles, and Policy Options and Interventions** are clear, balanced, and comprehensive. They express a vision that can begin to address global harm from alcohol.

GAPA Concerns

Alcohol Marketing Issues

GAPA is disappointed by the weakness of the policy discussion concerning the marketing of alcoholic beverages. In particular, we note that the suggested policy interventions include co-regulation and industry self-regulation as “appropriate” parts of the strategy. Neither of these has an evidence base of effectiveness – in fact, several studies of self-regulation have found it ineffective. Voluntary codes of good marketing practice are routinely violated, nearly impossible to enforce in a timely manner, and condone much of the advertising and promotion, such as sports sponsorship and trans-national marketing messages, about which Member States have expressed concern.

GAPA believes that self-regulation and/or co-regulation are hopelessly inadequate substitutes for strong governmental regulation of alcohol marketing, and that the Strategy should reflect that reality. The strategy also weakens the specific recommendations in this section by removing the word “ban” and leaving “restrict” as the only option. The evidence base is strongest in support of bans on marketing, and various forms of marketing are already banned in numerous Member States. Therefore, bans should be explicitly on the table as options for Member States.

Appropriate Roles for Different Parties

The document contains several references to the need for “partnerships” and GAPA welcomes the call for various governmental and non-governmental entities to partner with WHO to address these problems. The document also addresses the appropriate roles of different parties concerned about alcohol policies. GAPA believes that the Draft Global Strategy should be improved by explicitly addressing the “appropriate” role of “economic operators” in the process of developing and implementing evidence-based, prevention-oriented policies to reduce the harmful use of alcohol.

To avoid conflicts of interest, the strategy should clearly state that policies and programmes to reduce alcohol-related harm need to be developed independent of commercial interests. Economic operators should avail themselves of opportunities to be in dialogue with WHO and other governmental bodies regarding their contributions, in their roles as alcohol producers, distributors, sellers, promoters to the reduction of alcohol problems. Such contributions to the implementation of alcohol strategies at all levels should be consistent with a duty to avoid interfering with public health objectives and public health policy.

* The **Global Alcohol Policy Alliance (GAPA)** is a worldwide coalition of NGOs, medical professionals, and researchers who work to prevent alcohol problems and reduce their toll on society. GAPA, which includes representation from all inhabited continents, was formed in 2003 and is headquartered in London, England.