

Lausunto

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Lausuntopyyntö luonnoksesta hallituksen esitykseksi eduskunnalle laiksi alkoholilain muuttamisesta

Lausunnonantajan lausunto

Voitte kirjoittaa lausuntonne alla olevaan tekstikenttään

Statement Against Online Alcohol Sales

International Blue Cross (IBC) working in 38 countries and has a member organization in Finland (Sininauhaliitto), advocates for the health and safety of our community, stand firmly against the practice of online alcohol sales. Alcohol consumption is linked to a wide range of harms, including deaths, suicides, injury, domestic violence, road traffic accidents and child abuse and neglect. The introduction of online delivery services has potential to exacerbate these harms, all of which threaten to undermine public health, safety, and social well-being.

1. Harm to Individuals and Society:

Online alcohol sales remove barriers that traditionally prevent over-consumption, especially among high-risk drinkers. In most places, liquor laws prohibit sales, serving or supply of alcohol within a licensed premise to intoxicated persons. Online sales make restricting supply of alcohol to intoxicated persons difficult, with research showing that most people who use alcohol delivery services would have stopped drinking on some, most or all occasions if delivery had not been available. The ease of access associated with online sales and delivery services makes it relatively stress-free for individuals to purchase alcohol in excessive quantities, leading to increased incidences of alcohol poisoning, chronic health conditions, and a rise in alcohol-related accidents. This not only harms the individual but also endangers others, from family members to innocent bystanders on the road.

2. Inadequate Age Restrictions:

The weak and often ineffective age verification processes in place for online alcohol sales potentiate easy access to, and consumption of, alcohol by minors. Research has shown that overall, age verification is worse for online alcohol delivery services than in onsite purchase. This usually takes the form of delivery agents not asking for or checking IDs, someone else accepting the order for the purchaser, and delivery being left unattended at the customer's doorstep. There have been expressions of concerns that online and delivery sales have made drinking by underaged persons easier. It has also increased opportunity for 'social supply', where an adult provides alcohol to someone under 18, and increased exposure to alcohol in the home environment thereby normalizing alcohol as part of everyday life. The risks this poses to our youth cannot be overstated, especially because early exposure to alcohol is linked to a higher likelihood of addiction, impaired brain development, and a lifetime of negative health outcomes.

3. Escalation of alcohol use disorders:

The ease associated with online alcohol sales and delivery services could undermine the management of substance use disorders. The removal of physical distance and efforts to obtain alcohol has been shown to contribute to increase consumption and alcohol use disorder. This not only hinders recovery efforts but also exacerbates addiction. In addition, many alcohol retailers offer promotions and discount sales that encourages purchase and consumption of larger amounts of alcohol. In an Australian study, 81.5% of online retailers offered discounted prices for larger purchases and 53.8% offered free or discounted delivery for purchases over a certain dollar amount. It is somewhat common knowledge that price is a major mechanism for controlling alcohol consumption and reducing related public health harms. A reduction the price of retail alcohol will encourage consumers to drink more, thus exacerbating addiction and other harms.

4. Financial risks for heavy drinkers:

The convenience of online alcohol sales paves the way for impulsive, unchecked spending. This can quickly spiral into financial ruin, as individuals are tempted to make frequent and excessive purchases without fully considering the financial consequences. The resulting economic strain devastates families, destabilizes households, and contributes to broader social and economic issues. Furthermore, marketing strategies employed by alcohol retailers, such 'After Pay' and 'Zip Money', allows customers to delay payment for alcohol purchase and to spread out the payment over a period of time. Apart from encouraging purchase by reducing upfront cost, these strategies increase financial risks for individuals with financial problems who might use these services to purchase alcohol and sink into debt. This risk is further increased as individuals make purchasing decision while intoxicated, potentially leading to expenses and indebtedness that could plunge individuals and households into serious financial jeopardy.

5. Increased availability and access hours:

Online sales and home delivery services are known to make access to alcohol easier and more convenient, including in the night time when alcohol-related harms are most likely to occur. Research has shown that a significant proportion of rapid delivery orders (51% in one survey) were placed between 6-9pm. Alcohol-related assaults are known to increase significantly precisely during

this period and a good proportion of these assaults occur at home (including those related to family violence) . Similarly, alcohol-related suicides and unnatural deaths are also more likely to happen at night and in the home . Online sales and delivery services defeat the purpose of reducing physical availability of alcohol through restriction of outlet density, which is a core component of the set of evidence-based alcohol regulation measures supported by the World Health Organization. Online alcohol sales are not amenable to physical restrictions; alcohol can be delivered to anyone across different postcodes. The combination of online delivery and physical outlets will significantly increase the physical availability of alcohol within the community making it difficult to implement outlet density restrictions to manage alcohol-related harms.

In conclusion, online alcohol sales foster easy access to alcohol and increased consumption and associated harms. These harms include compromising the safety of our communities, weakening protection for our youth, encouraging alcohol use disorders, and contributing to domestic violence and deaths. We strongly oppose this practice and call for immediate and decisive action to put an end to online alcohol sales.

Mojica-Perez, Y., Calinan, S., Livingston, M. (2019). Alcohol home delivery services: An investigation of use and risks. Centre for Alcohol Policy Research/Foundation for Alcohol Research and Education.

See Colbert, S., Wilkinson, C., Thornton, L., Feng, X. and Richmond, R. (2021). Online alcohol sales and home delivery: An international policy review and systematic literature review. *Health Policy*, 125, 1222-1237.

IBISWorld (2021). Online beer, wine and liquor sales in Australia. Market Research Report Online. <https://www.ibisworld.com/au/industry/online-beer-wine-liquor-sales/4087/>

Colbert, S. et al. (2021).

Mojica-Perez, Y. et al. (2019).

Mäkelä, P., & Warpenius, K. (2020). Night-time is the right time? Late-night drinking and assaults in Finnish public and private settings. *Drug and alcohol review*, 39(4), 321-329.

Darke, S., Dufloy, J., & Torok, M. (2009). Toxicology and circumstances of completed suicide by means other than overdose. *Journal of Forensic Sciences*, 54(2), 490-494.

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