



Finnish Alcohol Law Consultation:

STM075:00/2011

4th January, 2017

Finland has a **reputation** of good solid alcohol policy within the Nordic Welfare state model that protects the vulnerable population. This has been used as an example of good practice for other countries. (Holder et al., 1998) Key cornerstones for good alcohol policy are **limiting access and availability, ensuring that price and tax are high enough and that marketing is well restricted and monitored**. Additional evidence based good policy measures include **public health approach in prevention, brief intervention and treatment** of alcohol related harm and strict **drink driving measures**. (Babor et al., 2010)

Sadly, the new alcohol law draft in Finland is promoting better access and availability to alcohol and it is in **opposite trend to rest of the World**. As an example Eastern European countries are currently seeking to increase the price of alcohol at their countries and to limit availability and access. (Eurocare, 2016) Finnish decision makers are not just making **public health mistakes** with this new law but they are showing their **ethical views** by allowing one of nation's biggest killers to be more available. The new law clearly does not reduce alcohol harm and it is even clearly stated in the law proposal document.

Finland has had the alcohol monopoly to restrict the access and availability to alcohol. If the restrictions are removed it will be hard if not impossible to convince the EU to agree to return the current measures again. **If the law will be passed there is no going back**. We would recommend that the new law would be a **pilot for 5 years with an evaluation of the situation** at the end and then it would be possible to return to the original law if necessary. **Finland has a special status with the alcohol monopoly and it should be protected**. The future generations deserve an alcohol policy structure that protects their well being- monopoly must not scrapped hastily.

The alcohol law proposal is in **contradiction with the Governmental programme to reduce marginalisation**. It is therefore becoming an **ethical dilemma** of promoting individual's responsibility of their alcohol consumption choices instead of following the Finnish constitution to promote structures that support public health approaches. As stated in the proposal, if Finland wants to reduce alcohol related harm there would be good evidence based methods available- **this law proposal does not aim to reduce alcohol related harm**.

Removing the production method restriction for alcohol sold in grocery stores opens the opportunity for alcopops to be sold in shops. It is mainly the youth who consume such drinks. This change will **increase the risks for harmful youth drinking**. At the same time increasing the alcohol content limit from 4,7% to 5,5% increases the risks of alcohol harm as stronger alcohol is more available. Youth guarantee has been an approach to empower and enable youth to become active citizens and to tackle youth exclusion. Those youth that are in the risk groups are also known to consume more alcohol. With the increased availability it is likely that these vulnerable young people drink even more. The better availability and access will **polarise the problems** even further. (Mackenbach, 2015) The current law with long shop opening hours has already doubled the sales of alcohol by grocery stores although sales of other products is not really increasing. (Luonnos Alkoholilain p.25) Those who already have difficulties with alcohol have easier

access to stronger alcohol for more hours each day. This is **likely to increase alcohol related harm**. This is not a public health approach to bring more alcohol available to vulnerable groups. **We must ask what weighs more- profits and sales in shops or our nation's wellbeing and strong human capital through healthy population.**

International Blue Cross works in over 40 countries in the field of evidence based alcohol policy development and good practice in the field of substance abuse work. In Finland our member organisation is Sininauhaliitto ry. International Blue Cross suggests the following changes to the draft law text:

~~§37 16 year old will be able to serve alcohol when observed by head of staff shift. (the most senior staff member in each work shift)~~ Staff selling/ serving alcohol must be minimum 18 years old.

~~§17 Grocery stores can sell alcohol that has maximum 5,5 % ethyl alcohol content~~ Grocery stores can sell brewed alcohol that has maximum ethyl alcohol content of 4,7 %. (The production method restriction must remain to avoid alcopops coming to shops)

§43 Comment: If the law opens up opportunities to longer alcohol serving hours then more internal and external audit requirements must be put in place and more alcohol free spaces within our cities, parks and public spaces must be created.

Comment: Do not remove the production method restriction from the law, ready to drink alcopops must remain at Alko to reduce the risk of underage drinking.

Comment: Do not remove the rule that denies sales in debt. People with low income are likely to use the option of buying alcohol in debt in small shops. Just add credit card as a payment method.

Comment: Do not let the Happy hour offers be freely advertised again.

Comment: Protect the Finnish Alcohol Monopoly and make the new law a 5- year pilot after which you may choose to return to current law.

Yours Sincerely,



Anne Babb

General Secretary, International Blue Cross

International Blue Cross, Lindenrain 5a, 3012 Bern, Switzerland

Mobile Finland: +358440277880

Phone: +41313019804

Fax: +41313019805



Albert Moukolo

President of International Blue Cross

TOGETHER FOR A WHOLESOME FUTURE! www.ifbc.info

References:

Babor T., Caetano R., Casswell S., Edwards G., Giesbrecht N., Graham K. et al. Alcohol: No Ordinary Commodity—Research and Public Policy. Oxford, UK: Oxford University Press; 2010.

Eurocare 2016:

http://www.eurocare.org/library/updates/why_threaten_the_estonia_government_when_they_are_trying_to_ensure_you_have_healthy_consumers

Hallituksen esitys eduskunnalle alkoholilain ja eräiksi siihen liittyviksi laeiksi (2016)

http://stm.fi/documents/1271139/3513395/Luonnos+HE+alkoholilaini_+221116.pdf/4bcc7307-89e5-4c13-9c78-0f1f8e0fda40

Mackenbach, Kulhánová, Bopp, Borrell, Deboosere, Kovács, Looman, Leinsalu, Mäkelä, Martikainen, Menvielle, Rodríguez-Sanz, Rychtaříková, de Gelder (2015) Inequalities in Alcohol-Related Mortality in 17 European Countries: A Retrospective Analysis of Mortality Registers.

<http://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1001909>