



Submission responding to the World Health Organization Global Alcohol Action Plan Online Consultation

3 September 2021

Who are we

Australian Grape and Wine Incorporated (Australian Grape & Wine) is Australia's national association of winegrape and wine producers. Our activities focus upon the objective of providing leadership, strategy, advocacy and support that serves Australian wine businesses now and into the future.

We represent the interests of the more than 2,500 winemakers and 6,000 winegrape growers working in Australia. Our role is to help forge a political, social and regulatory environment - in Australia and overseas - that enables profitable and sustainable Australian wine and winegrape growing businesses. These businesses make a significant contribution to underpinning regional economies by driving growth in jobs, regional exports and food and wine tourism.

Australian Grape & Wine's voluntary membership represents over 75% of the national winegrape crush. We represent small, medium and large winemakers and winegrape growers from across the country. Policy decisions by the Australian Grape & Wine Board require 80% support, ensuring no single category can dominate the decision-making process and guaranteeing policy is only determined if it provides significant industry benefit. In practice, most decisions are determined by consensus.

Australian Grape & Wine is recognised as a representative organisation for winegrape and wine producers under the *Wine Australia Act 2013* and is incorporated under the *SA Associations Incorporation Act 1985*. We work in partnership with the Australian Government to develop and implement policy that is in the best interests of winegrape growers and winemakers across Australia.

Executive Summary

Australian Grape & Wine welcomes the opportunity to provide a submission in response to the first draft of the World Health Organization's (WHO) Global Alcohol Action Plan 2022-2030 (GAAP). A well-crafted and evidence-based GAAP will be an important reference point for governments as they seek to design policies to address harmful alcohol consumption in their communities. In the Australian context, Australian Grape & Wine is committed to working to reduce harmful alcohol consumption and fostering a culture of drinking in moderation. Our objective, ideally, is to work government, our members and public health professionals, to achieve this goal – together.

We hope this submission helps strengthen the GAAP by encouraging uptake of more inclusive and credible approach to dealing with harmful alcohol consumption. The key points we wish to make include:

- It is critical that the plan targets harmful alcohol consumption, as opposed to *per capita* reductions in alcohol consumption
- The GAAP should reflect the mandate agreed by the WHO Executive Board in 2020, which did not include a mandate to pursue a Framework Convention on alcohol
- The draft GAAP's references to excluding economic operators from alcohol and health policy setting is short sighted, ignorant to the good work being done by many economic operators in Australia and around the world, and contradictory to the whole of society approach to consultation put forward in the Global Strategy to Reduce the Harmful Use of Alcohol (the Global Strategy)
- The GAAP must be flexible enough to allow member states the room to set policies that are appropriate and proportionate to their local contexts
- Australia has a positive experience of reducing harmful alcohol consumption. To a significant extent, this is driven by the good work of economic operators who have sought to find targeted ways to reduce harmful alcohol consumption.

We are committed to working with governments and our members to drive positive change to Australia's drinking culture and providing a positive example for other member states to draw upon as they form their own alcohol and health policy-settings.

Alignment with 2020 Executive Board Mandate

Focus should be on reducing harmful alcohol consumption

Australian Grape & Wine is mindful of the 2020 Executive Board mandate, which endorsed the importance of the Global Strategy as the primary global alcohol policy. The GAAP should be drafted in a way that is consistent with this mandate. Reducing *harmful* alcohol consumption should be at the core of the plan, and member states should have the flexibility to draw upon the full suite of policy options available to them, in order to pursue a course of action that fits their own unique context.

The draft GAAP's departure from the Global Strategy's focus on reducing *harmful* alcohol consumption to reducing *per capita* consumption is alarming. It contradicts the mandate

provided by the Executive Board and member states, and introduces a new target of reducing by 20 per cent relative consumption of alcohol per capita by 2030. We question how this target came to be set, given it:

- Is inconsistent with the 10 per cent relative reduction by 2025 that member states had agreed as part of the Global Action Plan for the Prevention and Control of Non-Communicable Diseases (GAPNCD)
- The focus on reducing consumption and not harmful consumption is inconsistent with the member state agreed metrics of heavy episodic drinking, alcohol related mortality and alcohol related morbidity.

As such, the target of 20% relative reduction in the consumption of alcohol per capita should be removed from the Action Plan.

Recognition of full menu of policy options

It is clear that the rates of harmful alcohol consumption, and the ability of governments and economic operators to address these harms, varies significantly across the WHO's membership. Further to this, rates of economic development, demographic profiles and cultural and religious backgrounds, all provide for a diverse array of issues for governments to ponder when considering alcohol and health policy options.

Given this, it is critical that governments have the opportunity to assess the broadest suite of options available to them when considering how to address harmful alcohol consumption. The Global Strategy provided member states with a broad range of policy options and interventions that could be drawn in seeking to achieve this objective, and it is appropriate that the GAAP continues to provide this suite of options, in line with the 2020 Executive Board Mandate.

Australian Grape & Wine is particularly concerned that the draft GAAP restricts policy options to the so-called SAFER policies, and seeks to define success on the basis of how well a member state implements these options. We believe the true measure of success for government and industry alike will be seen in the continuing reduction of harmful alcohol consumption, and not a government's willingness to implement policies that may be completely unsuitable to their needs or the desires of their population. The exclusive promotion of SAFER policies stifles both policy innovation and the capacity for deeper constructive partnerships between government and economic operators. It also fails to recognise the diversity of economic development across the membership and the need for individual approaches within member states appropriate to their own unique contexts. In short, a one-size-fits-all approach may be simple to recommend, but it is a sub-optimal approach to dealing with harmful alcohol consumption in many countries.

In Australia, for example, the case for implementing the SAFER options is not strong. The data provides evidence that a population-wide shift in drinking behaviours is occurring in Australia (See page 7). The data also tells us where more work needs to be done, and this helps government and industry to identify areas for collaboration and targeted policies and measures. Given this, it would not be appropriate to limit the Australian Government to the SAFER options.

Furthermore, the proposal to evaluate performance in the context of a country's implementation of the SAFER options is illogical for many member states. In the Australian example, this would mean the Government would be assessed for its implementation of policies that may be entirely unsuitable to its needs, while failing to recognise the significant strides made in reducing harmful alcohol consumption. This would be a poor outcome - case of measuring process, rather than outcomes.

Economic Operators

Australian Grape & Wine firmly believes that economic operators should play an essential role in designing policies and interventions that seek to reduce harmful alcohol consumption. It is, therefore, unfortunate that the GAAP makes a number of references to economic operators as 'interfering' and inherently conflicted, with no recognition of our unique ability to positively contribute to harm reduction. We believe we need to consider all options to dealing with harmful alcohol consumption, seeking investments and effort from governments and industry alike, with a view to achieving a common goal of reducing harmful alcohol consumption. Achieving this goal is in the interests of the community, governments and economic operators alike.

Economic operators should continue to be engaged in policy development, formal consultations and ongoing dialogue - viewed and treated as all other stakeholders interested in reducing the harmful consumption of alcohol. The GAAP should embrace the opportunities presented by economic operators and ensure they are treated on par with other stakeholders within the whole-of-society approach to reducing the harmful use of alcohol as set out by the Global Strategy and 2018 UN Political Declaration on non-communicable diseases.

The Global Strategy states that its implementation "will require active collaboration with Member States, with appropriate engagement of international development partners, civil society, the private sector, as well as public health and research institutions". However, this standard is not upheld in the draft GAAP, which:

- Limits dialogue to unreasonably seeking economic operators to focus on the implementation of marketing bans
- Proposes the measure for economic operators to refrain from promoting drinking, which unacceptably requires companies to cease all marketing
- Creates a role for civil society to be 'monitoring and countering undue influences from commercial and vested interests', in turn establishing a combative relationship between civil society and economic operators
- Alienates economic operators by proposing 'actions' for non-state actors but 'measures' for economic operators with no explanation of the different approaches despite both stakeholders being subject to WHO Framework of Engagement with Non-State Actors (FENSA), and
- Makes the unfounded claim of economic operators are 'interfering with alcohol policy development and evaluation'.

This is unfortunate for two reasons. Firstly, we believe a departure from the agreed language of the Global Strategy and the mandate of the Executive Board erodes the trust member states and economic operators have in the WHO secretariate to draft proposals in line with what has been agreed. Secondly, as noted before, by seeking to exclude economic operators from policy consultations and accusing them of 'interfering with alcohol policy development and evaluation', the draft GAAP is proposing sub-optimal outcomes for communities and governments, while unnecessarily punishing businesses and their employees.

The examples highlighted in the GAAP noted above require rectification in both approach and language. We want to work with governments, civil society and the community more broadly to achieve positive change, with without respectful engagement environment for all stakeholders,

the GAAP will only create unnecessary barriers to collaboration, innovation, and ultimately, to reducing alcohol related harms.

Framework Convention on Alcohol

Australian Grape & Wine was surprised and disappointed that the draft GAAP makes an explicit reference to the concept of a Framework Convention on Alcohol. The Executive Board did not endorse this approach in its meeting in February 2020, and it is unclear why the draft GAAP refers to it, or its claim that the lack of a framework convention serves as a barrier to implementation of the Global Strategy. We do not believe there is a strong evidence base for making such a claim. Given this, and given the fact that the issue has already been considered by the Executive Board, it is inappropriate for the GAAP to continue to promote this concept. References to a Framework Convention should therefore be removed.

Approach to Labelling

Similar to our comments with regard to providing flexibility to member states in policy development, Australian Grape & Wine believes the draft GAAP's approach to labelling is rigid and overly prescriptive.

In the draft GAAP, the WHO secretariat is tasked with developing international standards for the labelling of alcohol beverages. The draft goes on to propose that member states should introduce labelling requirements to display ingredients, caloric values and health warnings. However, in the Global Strategy, labelling is presented as one of many options available to states to provide consumers with better information. The approach in the draft GAAP does not align with the Global Strategy and does not provide flexibility for local contexts and needs. As such, the draft's alcohol labelling recommendations should be removed. The need to remove this is even more pertinent considering that the matter of labelling on alcoholic beverages is currently being considered by CODEX and the outcome of this process should not be pre-empted.

Taxation

We note the Global Strategy rightly puts the onus on member states to design efficient taxation systems, including for alcohol. However, the draft GAAP proposes that Member States consider a global tax on alcohol. This is significant overreach draft GAAP, based on the premise being that the global tax be governed internationally and used to support the treatment of alcohol use disorders. This suggestion does not align with existing taxation laws or governance and as taxation. It also, once again, seeks to apply a one-size-fits-all approach without considering the needs of individual member states and what they are trying address with regards to alcohol related harm. Taxation is clearly a competence for Member States and, as such, references to a global tax should be removed.

International Trade

The draft GAAP calls for expanding the role of the WHO Secretariat through the inclusion of two actions relating to international trade (both of which relate to alcohol-attributable health burdens on international trade).

This is inappropriate as international trade is a responsibility of member states and at a greater level, the competence of the World Trade Organization (WTO). Furthermore, member states need to be doing everything they can to support global economic growth in the wake of the ongoing COVID-19 pandemic, including through capturing the benefits of free and open global trade. With many economies and societies at risk of becoming more inward looking and suspicious of trade and globalisation, it is not helpful to create more global barriers to trade, and an

environment in which member states may be incentivised to create health-based technical barriers to trade.

It is unclear how this concept emerged in the draft GAAP, as international trade was not part of the remit of the Global Strategy, nor the mandate of the Secretariat. This reference should be removed from the draft GAAP.

Industry Funding of Alcohol Research

Australian Grape & Wine fully supports the argument that there is a need for better data and research at the national and global levels with regard to alcohol consumption trends, and broader alcohol related research. Economic operators have an interest in funding research related to their products, however, historically, research conducted or funded by economic operators has been excluded or discredited by the research community and scientific journals as being biased.

The alcohol industry welcomes discussions to develop new models to allow the private sector to develop critical research partnerships to support high-quality and credible alcohol health and policy research, as well as program implementation and evaluation.

The Australian Experience

Australia is proving that government and economic operators can work together to deliver real improvements in the rates of harmful alcohol consumption. Australian Grape & Wine is proud of the trends we are seeing in the data, and we are proud of our contribution to helping drive these trends.

What are the trends in Australia?

While the draft GAAP makes the subjective assessment that the reduction in global alcohol consumption has not been 'considerable', we are proud of the positive trends we are seeing with regard to the rates of harmful alcohol consumption:

- In 2004, 9.1% of people drank daily compared to 5.4% in 2019. This represents a 40.7% decrease in the proportion of Australians drinking daily.
- The proportion of Australians drinking at lifetime risky levels decreased 20.3% from 2004 to 2019 (21.1% to 16.8% respectively), reflecting a decrease in harmful drinking in Australia.
- In 2004, 30.0% of Australians drank at single occasion risky levels, which has decreased to 24.8% in 2019. This represents a 17.3% reduction in single occasion risky drinking in Australia.

In addition, when it comes to youth behaviours and alcohol:

- In 2004, the average age of initiation for young people aged 14-24 was 14.8 years, compared to 16.2 years in 2019.
- The proportion of youth (aged 15-24) abstaining from alcohol has increased from 22.3% in 2010 to 32.5% in 2019, reflecting a 45% increase in the number of youth drinking and the growing culture of responsible drinking in Australian youth.

DrinkWise, has undertaken research on the status of Australia's drinking culture and the impact of its many awareness campaigns. One of the most comprehensive pieces of research is DrinkWise's [Australian Drinking Habits: 2007 vs 2017](#), undertaken to clarify how Australian drinking culture has changed over that decade, what influenced these changes, and what this

means for health prevention efforts to reduce harm from excessive consumption. This research built on the findings from DrinkWise's 2007 study, [Drinking Patterns in Australia 2001-2007](#), undertaken by independent market research firm GalKal to explore Australian drinking habits.

The results of this research revealed that for the most part, Australians have a positive relationship with alcohol and drink moderately to relax and enjoy a meal with family and friends. This research also shows that Australians are drinking less, and the rate of underage drinking is decreasing. These trends mirror recent government findings from the [Australian Institute of Health and Welfare](#), which suggest that our relationship with alcohol is fundamentally changing to one that is more mature and responsible.

This evidence-based approach has and continues to inform Drink Wise's mass-media campaigns and provides relevant benchmarks to measure success in its future campaigns.

These are exceptional results, driven by policies and interventions of both government and economic operators.

The contributions of economic operators

The contribution of economic operators, including Australian Grape & Wine and its members, has been a significant factor in driving positive change in Australia's drinking culture. We focus on supporting effective programs that focus on education, awareness and changing behaviours relating to alcohol consumption. The alcohol industry works closely with stakeholders such as government, consumer groups and health professionals to implement solutions to excessive drinking.

DrinkWise

DrinkWise is an independent not-for-profit organisation established in 2005 and founded by alcohol industry leaders and community partnerships. Its governing board of eight community and six industry members, delivers unique benefits and insights by bringing together representatives from the health sector, the community and industry. The organisation is funded through voluntary industry contributions from the alcohol sector and has previously also received funding from governments of different political persuasions.

DrinkWise aims to:

- Promote a generational change in the way Australians consume alcohol; and
- Increase the age that young Australians are introduced to alcohol, as evidence has shown that alcohol can impact the development of the adolescent brain.

Since its inception DrinkWise has delivered numerous major campaigns promoting responsible drinking and targeting what the evidence continues to identify as the two key drivers of underage drinking – parental drinking behaviour and peer group norms.

To create generational changes, the organisation develops and implements a range of national awareness and education campaigns and also provides practical resources to help inform and support the community about alcohol use.

DrinkWise is an evidence-based organisation, that relies on independent research and clinical advice, including consultations with experts in public health, neuroscience, epidemiology, and child and adolescent psychology.

Two DrinkWise programs that Australian Grape & Wine has worked closely with DrinkWise on are, the [DrinkWise Australia FASD Program](#) and the [Cellar Door Moderation program](#).

The Fetal Alcohol Spectrum Disorder (FASD) program creates awareness that it is safest for their baby if women who are planning a pregnancy, or are pregnant or breast feeding, do not drink alcohol. Partnering with mother and Olympic champion, Sally Pearson and medical expert Associate Professor Luke Burchill, the FASD program included a series of education videos, supported by a comprehensive media and PR strategy, messaging on female and male-centric news sites and a FASD-focused episode on Jam Pakt radio, as well as FASD-themed education programs delivered by Wanta Aboriginal Corporation in school and community settings in the Northern Territory. The consumer reach of this program was measured at 5.95 million, in 2020. The program also engaged two of Australia's most well-known and respected indigenous actors, Deborah Mailman and Aaron Pederson, to appear in educational advertisements and other collateral.

The Cellar Door Moderation program is another key pillar of Australian Grape & Wine's direct engagement with DrinkWise. The program is a partnership between Australian Grape & Wine and DrinkWise which provides visitors to cellar doors with a greater understanding of how many standard drinks they are consuming when consuming smaller tastings (or pours). This is a targeted approach, which gives a practical solution for consumers to moderate their drinking during their winery visits – particularly if they are driving.

To date, Cellar Door Moderation Program resources have been provided to over 1,800 cellar doors and tourism associations across Australia. The resources, which include 'scratch cards' (more than 237,000 have been distributed to date) for tracking tastings and responsible drinking messaging, will help educate the community and have received an extremely positive response from consumers, industry and government. More work is currently underway to create more resources for in-person and virtual wine festivals in 2021 and 2022.

Some other DrinkWise initiatives the WHO should take note of include:

- The role of parents
 - o The Australian alcohol industry understands the importance of delaying the commencement of alcohol consumption until people are over the age of 18, to reduce harm among young people and across their later years.
 - o DrinkWise has developed a number of programs aimed specifically at delaying the commencement of alcohol consumption.
 - o For example, DrinkWise has placed a major focus on parents' roles as influencers and role models in their children's lives when it comes to their future consumption of alcohol. DrinkWise recognised that for many parents talking to their kids about alcohol and setting clear boundaries and expectations was a daunting task.
 - o [DrinkWise's Delay 5 Point Plan for parents](#), is a guide to help parents delay the introduction of alcohol to teens, it provides practical advice on how to be a positive influence and delay the child's introduction to alcohol and is reinforced with a number of educational tools.
 - o These tools include
 - *Kids Absorb Your Drinking*, which was launched in 2008 and marked DrinkWise's first generational change campaign.
 - *Kids and Alcohol don't mix* a campaign to delay introduction of alcohol to kids and

- *You got this* a campaign targeting school leavers.
- How to Drink Properly (18-24 year olds)
 - In 2014, DrinkWise launched an Australian-first social marketing campaign designed to influence young adults (18-24 years) to drink responsibly – by moderating the intensity and frequency of binge drinking occasions. Built around a series of animated online videos, the campaign features a suave, classy and confident character who bestows cheeky words of wisdom upon 'amateur' drinkers.
 - Ongoing tracking research and an independent evaluation by a University consortium has indicated significant attitudinal and behaviour change among those who have seen the campaign, with the target audience indicating drinking less on a night out and utilising the various message platforms to communicate with their social group about the pitfalls of poor drinking behaviour.
 - *How to Drink Properly* has been recognised through numerous international and Australian advertising, creativity and effectiveness awards.
- You won't miss a moment if you DrinkWise
 - *You Won't Miss a Moment if you DrinkWise* is an industry first - a collaborative approach to conveying a unified moderation message which encourages sports fans, music lovers and festival-goers to drink responsibly and ensure they don't miss the most memorable moments of an event.
 - The initiative, targeting event attendees and those watching telecasts, has been seen and heard across AFL and NRL finals as well as the Spring Racing Carnival, Australian Open Tennis, Surfing Australia events and the 2015 World Cup of Cricket.
- Labelling Initiative
 - In 2010, DrinkWise developed consumer information messages for voluntary inclusion on alcohol labels to allow Australian consumers to better understand the facts around alcohol consumption.
 - Pregnancy health information labels indicating "It's safest not to drink whilst pregnant" and an accompanying pregnancy pictogram – were taken up by industry as key message on labels (at the request of Government).
 - The adoption of consumer information messages on product and packaging is voluntary and represents a significant commitment by industry.

The Australian Alcohol Beverages Advertising Code (ABAC)

An innovative initiative developed by representative bodies in the Australian alcohol sector is the Responsible Alcohol Advertising Code scheme (ABAC). Australian Grape & Wine was one of the founders of ABAC which is also funded by the Brewers Association of Australia, Spirits & Cocktails Australia and users of the ABAC advertising pre-vetting service. It is a not-for-profit scheme established to promote responsible advertising and marketing of alcohol beverages via agreed standards of good practice, regulation, education and advice to alcohol producers. The ABAC Scheme is:

- administered by a Management Committee which, along with government, includes representatives from industry and advertising;
- quasi-regulatory in nature, given the Australian Government is represented on the Management Committee and a Professor of Public Health, nominated by government, is part of all adjudication panel hearings.

The four key standards of the ABAC outline the requirements of Australian alcohol advertising and marketing in terms of:

- promoting moderate consumption;
- not appealing to minors;
- responsibly depicting the effects of alcohol; and
- not showing the consumption of an alcohol beverage before or during any activity that, for safety reasons, requires a high degree of alertness or physical co-ordination. These standards were designed to help ensure alcohol marketing and promotion is directed at adults and does not appear in media or formats which appeal to young people.

The [ABAC Responsible Alcohol Marketing Code](#) outlines the key standards for the responsible content and placement of alcohol marketing in Australia. Subject to regular reviews, it sets out the key standards for the responsible content and placement of alcohol marketing in Australia. A core element of the Code are the placement rules which include a requirement to implement available age restriction controls for alcohol marketing. The following resources are included to assist alcohol marketers meet this requirement:

- "How to" guides on implementing age restrictions for alcohol marketing via [Facebook](#), [Instagram](#), [Snapchat](#) and [YouTube](#) developed by the International Alliance for Responsible Drinking and World Federation of Advertisers.
- A guide that explains how to age-restrict individual posts on Facebook (useful for alcohol promotion on third party accounts, i.e., social media influencers) is available here, <https://www.facebook.com/help/352402648173466>
- The [Best Practice for Responsible Digital Marketing of Alcohol](#) has been developed to assist alcohol marketers and their agencies in the management of their digital marketing.

The ABAC standards and tools are reviewed frequently in line with community expectations. ABAC's pre-vetting service provides an assessment on whether a prospective alcohol advertisement meets ABAC's requirements before the advert is released publicly. Together, these tools and services are applied to help restrict exposure to alcohol marketing for children, including through digital media.

The ABAC Scheme is already operating effectively, and complaints are being addressed promptly. Australian Grape & Wine notes that the ABAC scheme provides strong protection around the promotion of alcohol to young people and would welcome government support for additional community expectations research. Australian Grape & Wine believes the current liquor licensing requirements for venues and retailers are the best mechanism for managing availability of alcohol.

Retail Drinks Australia

Our colleagues at Retail Drinks

Australia have also been engaging in cutting-edge, industry-led initiatives to help reduce harmful consumption. These include:

- ID-25
 - o A program to educate customers, dissuade attempted purchase by minors and to reinforce staff awareness and confidence to refuse service to minors with point-of-sale material. Under this program, if a customer looks under the age of 25, staff members are encouraged to ask to see proof of age ID prior to selling alcohol to that customer, under an inoffensive promotional line "if you look under 25, take it as a compliment, as we will ask for ID".
- Don't Buy it For Them
 - o A program designed to discourage secondary supply and to educate the community on their shared responsibility not to supply to under-age and highlights the penalties for doing so. It also reinforces staff awareness and confidence to refuse service when in doubt, with back-up point-of-sale material.
- Retail Drinks Online Code of Conduct
 - o Launched in July 2019, the Retail Drinks Online Code is an industry-wide framework developed in collaboration with government and community to enhance compliance in the responsible online sale and delivery of alcohol. The voluntary code has attracted signatories from a broad range of retailers, representing more than 80% of all alcohol purchased online in Australia. More information on the code can be found at www.retaildrinks.org.au/policies-advocacy/online-code-of-conduct.

Conclusion

Australian Grape & Wine hopes this submission helps to strengthen and improve the Global Alcohol Action Plan and drive continuous improvements in member states' efforts to reduce harmful alcohol consumption. We would be very happy to discuss this information in further detail with the Secretariat at any stage.

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