

International dialogue on sustainable financing for noncommunicable diseases and mental health

Web-based consultation | Feedback template

Organization: Australian Grape and Wine Incorporated

Type of organization (please add X next to your selection):

Member States

UN agencies, programmes and funds, and other multilateral organizations

Non-State actors

- nongovernmental organizations, including those representing lived experience of health conditions
- philanthropic foundations
- academic institutions
- other (specify): **private sector**

Please extend each of the boxes as needed to provide feedback:

Document of the draft emerging messages that will inform the outcome document of the international financing dialogue

The private sector has played a significant and active role in efforts to reduce the harmful use of alcohol, including in response to the UN Political Declaration on NCDs 2018. A whole-of-society approach to reducing the harmful use of alcohol remains a central pillar of global alcohol policy, as set out in the [WHO's Global strategy to reduce the harmful use of alcohol](#) and the [Global Alcohol Action Plan](#), as well as the *WHO Global action plan for the prevention and control of NCDs 2013-2030* and the *Sustainable Development Goals*. The private sector must continue to be included as part of the solution going forward.

Australian Grape & Wine is a member of the of the Partnership Council of the International Alliance of Responsible Drinking (IARD). We and our members have supported the range of global initiative undertaken by IARD to support a reduction in harmful use of alcohol in response to the UN Political Declaration on NCDs 2018. In addition to our work with IARD, Australian Grape & Wine also invests and leads a number of national activities that have supported the industry's priority of ensuring responsible consumption of Australian wine. As such the Australian wine industry also:

- Helps fund the operations of [DrinkWise Australia](#), which runs national information and education campaigns dedicated to promoting responsible drinking and reducing alcohol-related harm. DrinkWise develops and implements public education campaigns to raise awareness about responsible drinking and the potential harms of alcohol misuse. DrinkWise conducts and supports research on alcohol consumption patterns and their impacts on health and society. They provide evidence-based information to help inform public policy and individual decisions about alcohol use. DrinkWise offers resources and tools to help individuals and families make informed choices about alcohol. This includes providing information on standard drinks, safe drinking guidelines, and strategies for reducing alcohol consumption. DrinkWise runs targeted campaigns aimed at specific groups, such as young people, parents, and pregnant women, to address the unique risks and considerations related to alcohol consumption in these populations.
- Helps fund and manage the Alcohol Beverage Advertising Code ([ABAC](#)) which, with Government support, ensures that alcohol marketing and advertising are conducted responsibly. ABAC sets out specific guidelines and standards for the content and placement of alcohol advertisements to ensure they are responsible and do not encourage excessive or inappropriate consumption of alcohol. The ABAC Scheme includes a pre-vetting service where advertisements can be reviewed and approved before they are published or broadcast. This helps advertisers ensure their content complies with the Code. The Code includes guidelines on a range of specific issues, such as not targeting minors, not promoting offensive behavior, and ensuring responsible portrayal of alcohol consumption.
- Runs the [National Wine Foundation](#), which funds projects that address social problems which can lead to alcohol abuse.

- Are members of [Alcohol Beverages Australia](#) who also initiate a broad range of activities to promote responsible consumption. This includes working with other organisations and stakeholders to address issues related to alcohol misuse and harm. ABA promotes high standards and best practices within the industry, encouraging members to adhere to ethical business practices and responsible marketing and sales of alcohol beverages. ABA works to educate consumers about the responsible consumption of alcohol and provides information on issues such as standard drinks, safe drinking guidelines, and the effects of alcohol.

As part of a diversification strategy, the Australian wine sector has invested in innovative products, particularly no and low alcohol wines, which promote moderation and responsible alcohol consumption. This has become a key priority in the sector's diversification agenda. In recent years, significant investments have been made in the technology and development of these products to support these targets. The no and low alcohol category is growing globally and presents a significant opportunity for the industry.

3. Domestic financing for NCDs and mental health: What is the role of health taxes and other fiscal measures?

It is globally acknowledged that taxation and other fiscal measures are blunt instruments for addressing alcohol related harms. These measures can cause welfare losses to non-harmful users while failing to adequately control harmful consumption. Australian Grape & Wine, along with our sector, does not support broad based population-wide measures. Instead, we prioritise targeted approaches that address vulnerable and at-risk consumers. These approaches have been proven more effective at impacting behavioural change in those vulnerable consumers. Taxation or fiscal measures merely shift harmful consumption to other products and impose a negative burden on the vast majority of consumers who drink responsibly.

These measures only impact legitimate alcohol, which is already highly regulated and actively involved in efforts to reduce the harmful use of alcohol. Additionally, such measures drive the production of illicit alcohol which is unregulated and cannot be taxed or controlled by government fiscal measures. Illicit alcohol can be sold in large quantities at lower price as it avoids taxation. Implementing fiscal measures only affects legitimate alcohol production by increasing costs, which risks driving consumers towards illicit products. This shift poses a significant threat to national revenue streams and public health, perpetuating the very issues these measures seek to address.

Taxation of alcoholic beverages should be integrated into a comprehensive fiscal and regulatory framework. It must be proportionate, appropriate to the local context, and consistent with World Trade Organization principles. Taxation should avoid creating market distortions or exacerbating harmful consumption issues. ([IARD taxation statement](#))

Furthermore, analysis of "health taxes" should consider the comprehensive evidence from member states currently implementing them, rather than focusing on isolated examples. Peer-reviewed studies should be prioritized over grey literature.

4. Domestic financing for NCDs and mental health: priorities, purchasing and provider payments

There is significant under-investment in evidence-based preventative approaches to reduce harmful drinking, such as Screening and Brief Interventions (SBIs). The WHO has highlighted the “lack of resources to finance prevention and treatment programs and interventions.” ([WHO](#))

It should be recognised that global trade and private sector investment provides significant value national economies. This economic value generates revenue streams that can be used to combat NCDs.

General comments relevant to multiple papers:

The private sector must be included as a legitimate stakeholder in discussions on financing global health issues such as NCDs. References to the inclusion of the private sector are inconsistent across the papers. While the UN resolution ([A/RES/73/2](#)) calls for inclusion of the private sector, paragraph 6 of the emerging messages document omits listing the private sector as a participant in the dialogue. Similarly, the current form does not list the private sector under non-state actors. It is essential for all documents to align with the resolution and encourage participation from all stakeholders as requested by the resolution.

Please send this completed form to OnTheRoadTo2025@who.int during the period 1–26 May 2024.