

Stockholm, 16 January 2017

Brussels, 16 January 2017

To Finland's Ministry of Social Affairs and Health

***Concerning planned alcohol policy changes in Finland (matter STM075:00/2011)***

Nordic Alcohol and Drug Policy Network (NordAN) and European Alcohol Policy Alliance Eurocare urges Finland's government to reconsider plans to change the limits of public monopoly on sales of alcohol by authorizing the right to sell up to 5.5% alcohol at all retail outlets.

Studies clearly show that restrictions on availability is among the most effective measures to prevent alcohol problems. State alcohol monopolies, high age limit for purchasing alcohol, high alcohol prices, alcohol advertising ban and active measures against drink-driving are measures highly recommended by the World Health Organization.

As it is expressed by one of the world leading alcohol policy experts, professor Robin Room, the whole term and concept of alcohol policy has roots in Finnish (more widely, Nordic) alcohol monopoly. „The broad reach of what was thought of as “alcohol policy” was institutionalized in the extraordinarily broad mandate and scope of Alko, the Finnish state alcohol monopoly, which had functions and provided support for activities reaching far beyond the production and sale of alcoholic beverages (Holder et al., 1998). The term “alcohol policy” thus came into English fairly recently, more or less as an import from the Nordic languages.“

The proposed change would increase availability and goes against all findings and principles of public health policies which aim to safeguard and improve the health of citizens and may lead to increased alcohol related harm. But in addition to increasing availability it also reduces Alko's share of alcohol sales, contributing to weakening their role.

While it may be understandable that much weaker alcohol policy in Estonia (low prices and almost limitless availability) and an extent of cross-border trade has caused problems for Finland and reduced the effectiveness of the otherwise proven alcohol policy measures, the timing of these proposed changes cannot come at a more unexpected moment. As Finland is getting ready to move toward liberalization, Estonia is about to adopt the strongest alcohol policy bill in more than two decades. Beer taxes will be raised by 160% by 2020, alcohol availability will be restricted by a total ban on sale at the petrol stations, by introducing separate departments into major food stores with non-transparent walls. Outdoor alcohol advertising will be banned and alcohol ads (in TV, print-media and internet) will be limited to showing only the product that may be presented on single color background, and without sound and visual design elements.

These changes in Estonia could already in short time be potentially influential also for Finnish situation as alcohol across the sea will be less attractive and Finland will loose a tap of almost free alcohol so close to its borders.

Major changes are planned also in Lithuania, where among other measures, government is thinking about introduction of state monopoly by creating a special shop system. For starters Lithuanian Parliament with overwhelming majority adopted (in December 2016) legal changes which will substantially increase alcohol tax from March 2017. All groups of alcoholic beverages will be affected – while excise tax for beer and wine will increase up to 112%, for strong alcohol by 23%.

Now as the European Commission has decided not to renew its alcohol strategy, it is especially important that Member States fulfil their obligation to tackle alcohol related problems. With these changes Finland seems to be moving opposite to the whole Europe as almost all EU countries are adopting changes that limit availability of alcohol, among other measures.

Evidently, Finland has much stronger position compared to most EU states. With other Nordic countries, you have been leaders in implementing evidence based alcohol policies with exceptions like reduction in alcohol taxes in 2003 which was later considered a mistake. We urge you to keep your decisions on the safe side of public health and listen to your own alcohol and public health experts who have warned against these changes.

Yours sincerely,

Peter Allebeck,  
president, NordAN

Tiziana Codenotti  
president, Eurocare

Lauri Beekmann  
Executive Director, NordAN

Mariann Skar  
Secretary General, Eurocare

*NORDAN was established in September 2000 as a network of non governmental, voluntary organizations who all worked to reduce the consumption of alcohol and other drugs and who supported a restrictive alcohol and drug policy and who did not receive contributions from the commercial alcohol industry. Acting on these principles NordAN today have grown to have 90 non-governmental, voluntary member organisations in all the eight Nordic and Baltic countries (Denmark, Estonia, Finland, Iceland, Latvia, Lithuania, Norway and Sweden), all active in the alcohol and drug field.*

*EUROCARE is an alliance of non-governmental and public health organisations with around 60 member organisations across 25 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in advocacy and research, as well as in the provision of information and training on alcohol issues and the service for people whose lives are affected by alcohol problems.*

Letter is also supported by:

**Belgium**

Vereniging voor Alcohol-en Andere Drugproblemen vzw (VAD)

**Bulgaria**

Foundation Horizonti 21

**Croatia**

Mali Plac

**Czech Republic**

Centrum Alma

**Denmark**

Alcohol and Society

Central Denmark Region, Alcohol and Traffic Secretariat  
NGO Fontana

**Estonia**

Estonian Temperance Union

**Finland**

Finnish Association for Substance Abuse Prevention

**France**

Association National de Prevention en Alcoologie et Addictologie (ANPAA)

**Germany**

Deutsche Hauptstelle für Suchtfragen (DHS),  
Deutsche Guttempler IOGT e.V

**Hungary**

Oasis  
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**Ireland**

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North West Alcohol Forum  
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**Italy**

A.I.C.A.T (Associazione Italiana Club Alcolisti in Trattamento)  
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**Lithuania**

Agapao  
Lithuanian National Tobacco and Alcohol Control Coalition

**Netherlands**

STAP, Stichting Alcoholpreventie

**Norway**

Actis – Policy Network on Alcohol and Drugs  
Frelsesarmeens Rusomsorg  
IOGT Norway

**Poland**

The State Agency for Prevention of Alcohol related problems (PARPA)  
The Polish IOGT Foundation  
Krajowa Rada  
MONAR

**Portugal**

Centro de Alcoologia Nova Rumo  
Sociedade Anti-Alcoolica Portuguesa (SAAP)  
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**Switzerland**

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Swedish Council on Alcohol and Drugs

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Turkish Green Crescent Society

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Institute of Alcohol Studies

Alcohol Concern

Alcohol Focus Scotland

Alcohol Health Network

Balance, North East Alcohol Office

Scottish Health Action on Alcohol Problems (SHAAP)

***International***

ACTIVE - Sobriety, Friendship and Peace

Alcohol Policy Youth Network

Blue Cross International

EUFASD, European

IOGT International

EMNA (European Mutual Help Network for alcohol related problems)