

Topic guide – EU and national health care providers and organisations representing them working on health effects of alcohol

1.1 Introduction

1.1.1 Purpose and scope of the study

Interviewer to introduce themselves, the objectives of the study and the purpose of conducting this interview.

The European Health and Digital Executive Agency (HaDEA) has commissioned ICF S.A., a leading research and evaluation consultancy, to conduct a **Study to evaluate the effectiveness of health information on alcoholic beverages**, as part of the European Commission's ongoing preparatory work and evidence gathering regarding the introduction health warnings on labels of alcoholic beverages based on Europe's Beating Cancer Plan. The study has started in April 2023 and will last until April 2024.

The aim of the study will be to gather evidence to enable the Commission's consideration of a suitable policy instrument to introduce health warning labels on alcohol beverages.

As part of the study, we will conduct a series of consultation activities (e.g., targeted surveys, targeted interviews, etc) to gather the views and opinions of key stakeholders at EU, national and international level who will be directly or indirectly affected by the development/implementation of any possible alcohol health warning labels at EU level. This consultation activities will be taking place between September and December 2023.

1.1.2 Method of the study

Interviewer to introduce method of the study below

The methods used for the Study are the following:

- Desk research
- Exploratory interviews
- Literature review
- Targeted survey
- Targeted interview
- Workshops
- Case studies

1.1.3 Consent to take part in the interview

We would like to assure you that everything that is said during the interview will be anonymised and will only be used to inform the study. Information and quotes will not be attributed to organisations and/or individuals.

We would like to know if you would consent for the interview to be recorded. The recording will only be used by the interviewer and could only be accessed by the ICF study team if needed.

Do you consent to recording the interview for note-taking purposes?	yes
Name of interviewee	
Date	23/10/2023

1.2 Overview of stakeholder

Interviewee name:	Alessandro Gallina
Job title:	Policy Manager
Organisation:	European Public Health Alliance (EPHA)
Interviewer (ICF)	
Date:	23/10/2023

1.3 Stakeholder background and involvement

1.3.1 Introductory question

- 1. Could you please introduce yourself and briefly explain how your organisation/institution and your role relates to health warning labels on alcoholic beverages?**

I am Alessandro Gallina and I currently serve as the Policy Manager for Non-Communicable Diseases (NCDs) Prevention Policies at the European Public Health Alliance (EPHA).

With more than 70 members, our organization is a leading alliance in promoting public health in Europe, advocating for 30 years for greater health equity, and working towards tackling Europe's public health challenges with a solid and evidence-based approach.

In my role, I focus on the prevention of NCDs, which includes issues related to alcohol consumption. A plethora of academic papers and WHO's reports indicate that Alcohol is a known risk factor for more than 200 NCDs, including liver diseases, cancers, and cardiovascular diseases. EPHA actively participates in policy dialogues and advocates for evidence-based policy measures to curb alcohol-related harm, which most certainly includes health warning labels on alcoholic beverages.

We view health warning labels as an indispensable element in a comprehensive strategy aimed at mitigating the adverse health effects of alcohol consumption. These labels function not merely as informational tools for the public; they also catalyse important societal dialogues about the often-underrecognized risks

linked to alcohol use. In our policy advocacy efforts, we work closely with our member organizations that specialize in alcohol policies. **Regrettably, the majority of EPHA's most active members working on alcohol policies, namely EuroCare, and IOGT-NTO have not been invited to participate in this particular study.** Despite this, we remain committed to offering our expertise, building strategic partnerships, and advocating for public health with a unified voice in interactions with European institutions. Accordingly, we are keenly interested in the findings of this study and look forward to making meaningful contributions to it.

1.4 General overview of Alcohol health warning messages

1. In your view, what are the most harmful effects of alcohol on human health?

The question concerning the most harmful effects of alcohol on human health should be addressed through an **evidence-based approach rather than soliciting opinions**. To this end, we strongly advocate for consulting established public health authorities, such as the WHO, which has identified more than 200 diseases that can arise from alcohol consumption¹.

It's crucial that the metrics for measuring harm are clearly defined. This should cover not only the number of deaths but also detrimental impacts on physical health, mental well-being, quality of life, and even harm to others and financial repercussions. We recommend relying on public sources of credible data to gauge these dimensions comprehensively.

We must underscore that the alcohol industry should not be consulted on this matter due to **an inherent conflict of interest**, hence we are highly interested in the methodology behind the selection of respondents for this survey, as it's essential that the views represented are diverse yet authoritative.

2. In your opinion, are people/individuals aware of the harmful health effects of alcohol?

No, they do not.

2.1 [If yes] which harmful health effects do you believe are the most commonly known/cited by people/individuals?

2.2 [If not] why do you think they are not aware of the harmful health effect of alcohol consumption?

In our opinion, but more importantly, **as reported by a plethora of surveys and research articles, the general public's awareness of the harmful health effects of alcohol is inadequate and often vague**. While people might have a general sense that alcohol can be harmful, there is a significant lack of clarity and understanding regarding the specifics of these health risks.

National surveys from countries like Ireland and Norway, along with studies conducted by public health organizations, all indicate a pervasive lack of knowledge concerning the detailed harmful effects of alcohol. People may know

¹ [Health warning labels on alcoholic beverages: opportunities for informed and healthier choices \(who.int\)](http://www.who.int/nutrition/publications/label_alcohol/en/)

it's "bad for you," but they may not be aware of the spectrum of diseases and conditions related to alcohol consumption or the potential for harm to others and financial repercussions.

For effective public health interventions, it's essential to close this knowledge gap through credible, evidence-based educational campaigns and initiatives.

3. In your view, would improved consumer understanding/knowledge of the harmful health effects of alcohol influence decisions to consume alcohol?

Improved consumer understanding and knowledge about the harmful health effects of alcohol would indeed influence decisions to consume alcohol. **Health warnings have been shown to be effective in raising awareness about the risks and harms associated with substance consumption, as evidenced by the impact of health warnings on tobacco products.**

However, it's important to note that the effectiveness of such health warnings is maximized when they are part of a comprehensive public health strategy.

Introducing health warnings could be particularly impactful when coupled with other strategies like taxation, monopolies on alcohol sales, pricing, and marketing regulations. Studies, such as those conducted in Canada, have shown that labelling can indeed decrease sales of alcohol products when implemented as part of a broader suite of measures².

The wording of these warnings is critical. While the public is generally aware of the link between tobacco and cancer, the connection between alcohol and various diseases, including cancer, is less well understood. **Clear, unambiguous warnings are essential for educating the public effectively. Consumers have the right to this information, and evidence supports that providing it can lead to behavioral changes.**

Therefore, while improved knowledge alone may not be sufficient to drastically reduce alcohol consumption, it is a vital component in a multi-pronged approach to public health policy related to alcohol.

4. [If yes] do you think it can also influence the amount of alcohol they consume? If not, why?

Absolutely, we believe that improved consumer understanding can influence not only the decision to consume alcohol but also the amount consumed. Awareness of the caloric content of alcohol, its detrimental effects on cardiovascular health, and the risk of cognitive decline could make individuals more hesitant and prudent in their alcohol consumption. Increased knowledge empowers consumers to make more informed choices, which may result in reduced intake. Therefore, transparent and clear health warnings are an essential tool in a broader public health strategy to mitigate the harms associated with alcohol consumption.

² [Beer and wine sales in Canada fall to all-time low - BBC News](#)

1.5 Awareness of the harmful effects of alcohol consumption

5. In your opinion, can alcohol health warning labels raise citizen's awareness on the harmful effects of alcohol consumption? If yes, in what way?

Yes, we firmly believe that alcohol health warning labels can effectively raise citizens' awareness about the harmful effects of alcohol consumption if they are designed appropriately. **The literature provides extensive guidance on the elements that make a health warning effective³.**

Labels should be visible and incorporate graphic elements to capture attention, akin to successful campaigns like those in New Zealand⁴. They should also use clear and straightforward language that communicates the risks unequivocally. The objective is to facilitate informed decisions by providing consumers with easy-to-understand yet impactful information. In this way, labels can act as a critical tool in a comprehensive public health strategy aimed at reducing the negative impacts of alcohol consumption.

6. In your view, are there any elements/factors that could limit the effectiveness of health warning labels?

Yes, several factors could limit the effectiveness of health warning labels on alcoholic beverages:

- **Size and Design:** If the labels are too small or poorly designed, they are likely to go unnoticed or be disregarded by consumers.
- **Language and Wording:** The choice of language and the complexity of the wording can either enhance or diminish the label's effectiveness. It is essential to use clear, straightforward language that communicates the risks unequivocally.
- **Visual Elements:** The absence of graphic elements like pictures can significantly decrease the label's effectiveness.
- **Complementary Campaigns:** Lack of public awareness campaigns to inform citizens about the new labeling initiative can reduce its impact.
- **Digital Labeling:** Relying on digital labeling methods that require consumers to take additional steps to access the information (e.g., scanning a QR code) is less effective as many people will not take the time to engage with it, as supported by studies⁵.
- **Multilingual Requirements:** In settings where more than one language is required on the label, the size of the label should be increased to ensure that all information is easily readable.

Thus, for health warning labels to be effective, they should be part of a broader public health strategy and be designed with these factors in mind.

³ [Eurocare Alcohol labelling position paper.pdf](#)

⁴ [direct \(mpi.govt.nz\)](#)

⁵ [Assessing the impact of providing digital product information on the health risks of alcoholic beverages to the consumer at point of sale: A pilot study - PubMed \(nih.gov\)](#)

1.6 Citizen's decision to consume alcohol

7. In your view, can alcohol health warning labels influence people/citizen's decision to consume alcohol? If yes, in what way?

Yes, alcohol health warning labels can significantly influence people's decisions to consume alcohol. When individuals are informed about the risks and consequences associated with alcohol consumption, they are better equipped to make more informed choices. Labels that are well-designed, clear, and concise can act as immediate reminders at the point of purchase, potentially causing individuals to reconsider their decision to consume alcohol. However, it's important to note that labels are most effective when they are part of a comprehensive strategy for reducing alcohol consumption, which could include public awareness campaigns, taxation, and marketing restrictions.

8. In your view, are there any external factors (i.e. social and cultural norms) that could influence the way people will respond to the introduction of health warning labels on alcoholic beverages?

External factors such as social and cultural norms can indeed influence the effectiveness of health warning labels on alcoholic beverages. However, it's important to consider that the issue goes beyond just social norms and dives into the Commercial Determinants of Health (CDoH). **The packaging and marketing strategies employed by the alcohol industry are designed to promote their products while minimizing public awareness of the associated health risks.**

As previously mentioned, it's crucial that the introduction of health warning labels not be done in isolation but as part of a comprehensive strategy. **This could include public awareness campaigns targeting various communities and demographics, and even incorporating additional information campaigns alongside the labels, similar to what has been done in Ireland⁶.** By making the warning labels a part of a broader public health initiative, their impact can be optimized.

9. Of those factors, which ones do you think are the most important?

The most important factors affecting the effectiveness of health warning labels on alcoholic beverages are the Commercial Determinants of Health (CDoH). These are largely influenced by industry practices, including pricing strategies and advertising campaigns. Over time, these commercial factors have the power to shape social determinants, effectively shaping cultural norms around alcohol consumption. As evidenced by historical data, the alcohol industry's marketing tactics have contributed to a significant increase in alcohol consumption since the 1960s.

In this context, it's not merely a matter of individual choice but a systemic issue where industry practices significantly influence public behaviour and perceptions.

⁶ [The latest Irish campaign to promote more moderate drinking - Drug and Alcohol Information and Support in Ireland - Drugs.ie](https://www.drugs.ie/campaigns/moderate-drinking)

Therefore, addressing these commercial determinants—such as through regulatory measures on pricing and advertising—is paramount for the effectiveness of any health warning labels.

1.7 Health warnings labels on similar products

10. In your view, what type of content should be included/considered when developing health warning messages for alcoholic beverages? Why would you suggest including/considering this type of content?

The development of health warning messages for alcoholic beverages should be rooted in evidence-based research and employ a multi-modal approach for maximum impact. We recommend a combination of statistical data and narrative elements to engage consumers on multiple levels. While people may not immediately react to numerical information, a storytelling approach can help in making the data more relatable and emotionally impactful.

Furthermore, visual elements like pictures should be incorporated but should be complemented by explanatory text for clarity. Messages should be brief and straight to the point, providing consumers with critical information in an easily digestible format.

The overall objective should be to design warning labels that not only inform but also resonate emotionally, triggering thoughtful reflection on the risks associated with alcohol consumption. This multi-pronged approach is more likely to effect change in behaviour, particularly when implemented as part of a comprehensive strategy that includes other regulatory measures like pricing and advertising restrictions.

1.8 Alcohol consumption patterns

11. Do you think that in the future there could be a organic/natural changes in the populations' alcohol consumption patterns in the absence of policy interventions? If so, what type of change? Why do you think that?

In my view, the notion of "organic" or "natural" changes in populations' alcohol consumption patterns in the absence of policy interventions is misleading. It's critical to recognize that consumption patterns are predominantly influenced by industry tactics including price, promotion, marketing, and product availability. While there may be a mild decline in alcohol consumption among younger demographics, this change is not substantial enough to mitigate the risks or societal impact of alcohol abuse. Moreover, Europe has the highest alcohol consumption rates globally, while showing a clear steep rising of NCDs incidence and burden, further emphasizing the urgent need for policy intervention.

The most effective levers for influencing public behaviour include regulation of marketing, price strategies such as taxation, minimum pricing per alcohol unit, and controlling product availability. Other approaches, like educational campaigns in schools, may have a minimal effect, but we need more robust, ambitious actions to see significant change. In an EU-wide survey, one-fifth of smokers reported that health warnings have been effective in getting them to

smoke less and in helping them try to quit⁷. For example, tobacco consumption rates dropped substantially not due to organic change, but due to targeted, ambitious policy actions.

Therefore, relying solely on "natural changes" is not sufficient. We need a comprehensive, evidence-based approach that adapts to an evolving framework, including the digital landscape, to create a clear, substantial change in alcohol consumption patterns.

12. Do you think that in the future there could be a change in the level of populations' awareness of the harmful effects of alcohol consumption? If so, what type of change? Why do you think that?

Yes, there is potential for a significant change in populations' awareness of the harmful effects of alcohol consumption, but this largely depends on the strategies employed. If we introduce evidence-based, graphic health warnings on alcoholic beverages, there is a good chance that the level of awareness will increase. However, **the efficacy of such interventions is not guaranteed in a landscape where the alcohol industry, particularly the wine sector, yields considerable influence and has the resources to disseminate misinformation.**

It's important to note that the alcohol industry has direct channels to reach younger demographics and influence their behavior. For instance, there have been misleading messages claiming that "wine is good for the heart" or that the relationship between alcohol and cancer is "complicated". Alcohol is a Group 1 human carcinogen, as specified by WHO⁸. Such disinformation campaigns can offset the positive impacts of health warnings or educational initiatives.

Therefore, to achieve a meaningful change in awareness levels, it's imperative that we adopt a comprehensive approach. This includes introducing robust, evidence-based health warnings alongside other policy measures like regulation of marketing and pricing strategies. Additionally, **efforts must be made to counterbalance the industry's influence by ensuring that health messages are clear, straightforward, and widely disseminated.**

1.9 Relevant EU/International policies on alcohol

13. In your view, are there any existing relevant international/EU policies that could have an effect on consumers awareness of the harmful effects of alcohol consumption? If yes, which ones?

While policies themselves may not directly impact consumer awareness, their effective implementation certainly can. One example is the **alcohol monopoly system, which has demonstrated that its abolition correlates with**

⁷ [Health warning messages on tobacco products: a review | Tobacco Control \(bmj.com\)](https://www.bmjjournals.org/doi/10.1136/tobaccocontrol-2018-054272)

⁸ [Health and cancer risks associated with low levels of alcohol consumption - The Lancet Public Health](https://www.thelancet.com/journals/lph/article/101330)

increased alcohol consumption⁹. Therefore, maintaining such monopolies can be considered a form of public health intervention that impacts consumer behaviour and, indirectly, their awareness of alcohol's harmful effects.

Additionally, taxation policies at both the EU and Member State levels can play a pivotal role. By **setting a minimum taxation level on alcoholic beverages, the EU provides a framework within which Member States can work to manage consumption rates, thereby influencing consumer awareness indirectly.** The role of taxation in affecting consumption cannot be overstated, and it serves as a countermeasure to mitigate the impact of advertising by the alcohol industry.

Furthermore, the **banning of alcohol brands in advertising across all platforms can significantly impact consumer awareness.** Such bans serve to reduce the alcohol industry's influence and its ability to disseminate misinformation, while glamourising alcohol consumption.

In summary, while existing international or EU policies like alcohol monopolies and taxation may not directly raise consumer awareness, their effective implementation has the potential to create an environment where consumers become more cognizant of the risks associated with alcohol consumption.

14. In your view, are there any relevant international/EU (general or specific) policies that could have an effect on the populations' alcohol consumption patterns? If yes, please explain.

International and EU policies can indeed have a substantial impact on populations' alcohol consumption patterns. For instance, the EU trade rules, including those that enable online sales and direct purchases from producers, could pose a challenge to national alcohol monopoly systems, like the one in Sweden. **It is critical to recognize the public health value of such monopoly systems at the EU level to mitigate the potentially negative impact of such trade rules.**

Taxation is another key policy that has been shown to affect alcohol consumption. **Empirical evidence suggests that an increase in taxation correlates with a decrease in alcohol consumption¹⁰.** By setting minimum taxation levels, the EU provides a framework that enables Member States to enact policies effectively targeting alcohol consumption rates. This can also be corroborated by the success observed in tobacco control, where increased taxation led to decreased consumption.

In summary, policies related to trade rules, monopolies, and taxation all have the potential to significantly influence alcohol consumption patterns within the EU.

⁹ [Estimating the public health impact of disbanding a government alcohol monopoly: application of new methods to the case of Sweden | BMC Public Health | Full Text \(biomedcentral.com\)](#)

¹⁰ [Pricing as a means of controlling alcohol consumption | British Medical Bulletin | Oxford Academic \(oup.com\)](#)

The effective implementation and management of these policies are crucial for public health outcomes.