

IOGT International submission

European Commission consultation Modernizing and Simplifying the Common Agricultural Policy (CAP)

IOGT International welcomes the opportunity to contribute our expertise to the process of modernizing and simplifying the EU's CAP.

IOGT International is the premier global network of civil society organizations working to prevent and reduce alcohol-related harm through evidence-based policy measures and community-based interventions. IOGT International was founded in 1851 and has today 143 Member Organizations in 57 countries; based in Stockholm, Sweden we represent 60 civil society organizations from 26 European countries, out of which 14 are EU Member States. IOGT International has special consultative status with the United Nation's Economic and Social Committee (ECOSOC).

Alcohol harm in Europe

Europe is the heaviest alcohol consuming region in the world. Harms related to the high levels of alcohol use are a heavy burden on public health, social welfare and economic productivity in the European Union. For example, alcohol harm costs €155.8 in the EU every year.

Alcohol harm is pervasive and a heavy burden in Europe:

- Alcohol is the 3rd leading risk factor in Europe for ill health and Noncommunicable diseases (NCDs) such as cancer, diabetes or heart disease.
- 12 million people in the EU are alcohol dependent.
- Around 9 million children in the EU are growing up in homes with parental alcohol problems.

- 1 of 4 road fatalities in EU are alcohol related. In 2010 nearly 31,000 Europeans were killed on the roads of which 25% of deaths were related to alcohol.
- Alcohol is the leading risk factor for ill-health and premature death for the core of the working age population (25 to 59 years of age).
- Alcohol is responsible for 1 in 7 male deaths and 1 in 13 female deaths in the age group of 15 to 64 years, resulting in approximately 120 000 premature deaths.

Our specific answer and their evidence sources with regard to the CAP consultation

12. What are the main problems/obstacles preventing the current policy from successfully delivering on its objectives? What are the drivers behind these problems?

The CAP is out of touch with both scientific evidence, changing societal imperatives as well as developments in the legal framework for EU policy action. Article 168 of the TFEU mandates "A high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities."

This obligation has not been mainstreamed into CAP policy-making. Europe is the heaviest alcohol-consuming region in the world. Resulting harm is staggering: Economic costs of €155.8 billion, per year¹; by the European Commission's own admission "Alcohol related harm is a major public health concern accountable for over 7% of all ill health and early deaths. Even moderate alcohol consumption increases the long-term risk of certain heart conditions, cancers and liver diseases...²"

Health impact assessments (HIA) of agricultural policy are essential for operationalizing Article 168 within the CAP.

The CAP has a special budget of more than €1 billion per year predominantly used to finance productivity enhancement of vineyards and wine promotion measures. The European Court of Auditors considers this measure unnecessary.

¹ European Parliament, At A Glance – Plenary 24 April 2015:

[http://www.europarl.europa.eu/RegData/etudes/ATAG/2015/554195/EPRS_ATA\(2015\)554195_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/ATAG/2015/554195/EPRS_ATA(2015)554195_EN.pdf)

² European Commission: DG Sante: https://ec.europa.eu/health/alcohol/policy_en

The CAP modernization should aim to reduce overproduction, phase-out expensive market intervention measures and stop alcohol promotion; the ECA recommends lowering aid rates below the original scheme from period 2008-2011. The current CAP is inadequate in terms of public health, EU economy and sustainable agriculture and development.

13. Which elements of the current CAP are the most burdensome or complex and why?

Across policy areas, in response to levels of alcohol harm and within EU efforts to implement the 2030 Agenda, a policy priority should be to reduce overall alcohol consumption and associated levels of harm, including a reduction in the economic costs.

Alcohol is a burden to the achievement of 13 out of the 17 Sustainable Development Goals, adversely impacting SDG1, 2, 3, 4, 5, 6, 8, 10, 11, 12, 13, 16 and 17³. E.g., the water footprint of wine and beer production is terrible. To get one liter of wine, 870 liters of water are needed. It means that one glass of wine (125ml) costs 110 liters of water⁴. Per one liter of beer, 298 liters of water have to be used. One glass of beer (250ml) costs therefore 74 liters. One bottle of beer (500ml) costs 148 liters⁵. For instance, Garnett⁶ showed: "the contribution made by the alcohol sector to the UK's greenhouse gases is significant at nearly 1.5% of the UK's emissions total."

In its current form, the CAP is fueling a risk factor for human and planetary health, as well as for social and economic development. Modernizing CAP, it should be brought in line with evidence, to play a part in promoting socioeconomic welfare and human and planetary well-being, i.e. sustainable development. Promotional funds should be abolished which could save at least €1.595.013.000. The fact that promotion funds are used for advertising of wine runs contrary to TFEU Article 168 and must be addressed.

³ Alcohol, obstacle to development: evidence overview: <http://iogt.org/the-issues/advocacy/obstacle-to-development/>

⁴ Water Footprint Network: Gallery – wine: <http://waterfootprint.org/en/resources/interactive-tools/product-gallery/>

⁵ Water Footprint Network: Gallery – beer: <http://waterfootprint.org/en/resources/interactive-tools/product-gallery/>

⁶ Tara Garnett, Food Climate Research Network: The Alcohol We Drink And Its Contribution To The UK's Greenhouse Gas Emissions: A Discussion Paper, 2007:

<http://www.fcrn.org.uk/sites/default/files/ALCOHOL%20final%20version%20TG%20feb%202007.pdf>

33. Do you have more ideas for modernizing the CAP?

Modernizing the CAP means updating its policy framework and starting a transition pathway towards an integrated EU common food and agricultural policy. Agricultural policy should be oriented towards supporting the uptake of sustainable healthy diets. Health-harmful subsidies should be removed. Tobacco cultivation should be excluded from receiving public support. Specific support measures for sugar and wine, and promotional budgets that are not aligned with public health, should be discontinued. Historical entitlements should be phased out entirely. The specificity of the wine sector should be abolished. Wine is evidently harmful to human and planetary health. European wine producers should not receive preferential treatment and the EU should discontinue the protection of the wine sector.