Report of the Youth Alcohol Working Group
# Content

1. BACKGROUND TO THE EUROPEAN YOUTH FORUM WORKING GROUP ........................................ 2

2. SURVEY ANALYSIS .................................................................................................................... 3
   2.1 METHODOLOGY .................................................................................................................. 3
   2.2 SURVEY RESULTS ............................................................................................................. 3
   2.3 INTERNATIONAL YOUTH ORGANISATIONS ................................................................. 7
   2.4 COMPARISON OF YOUTH ORGANISATIONS WITH OTHER STAKEHOLDERS VIEWS .......... 7
   2.5 DISCUSSION ..................................................................................................................... 8

3. KEY RECOMMENDATIONS OF THE WORKING GROUP ON ALCOHOL POLICY ............... 10
   3.2 SOCIAL AND ECONOMIC PROBLEMS OF ALCOHOL .................................................... 10
   3.4 ROLE OF YOUTH ORGANISATIONS ................................................................................ 11
   3.5 YOUTH ENVIRONMENTS ............................................................................................... 11
   3.6 EDUCATION AND AWARENESS RAISING ..................................................................... 12
   3.7 BRIEF AND EARLY INTERVENTIONS .............................................................................. 13
   3.8 PROMOTION AND MARKETING ..................................................................................... 13
   3.9 RESTRICTED AVAILABILITY ......................................................................................... 13
   3.10 PRICE AND TAXES ....................................................................................................... 14
   3.11 DRINK-DRIVING ........................................................................................................... 14

4. CONCLUSION ............................................................................................................................ 15

5. SUMMARY OF WG RECOMMENDATIONS .......................................................................... 16

6 REFERENCES ............................................................................................................................. 18

7 APPENDIX .................................................................................................................................. 19
   6.1 EXAMPLE OF A CONSULTATION FORUM FOR YOUNG PEOPLE: THE IRISH YOUTH PARLIAMENT .... 19
   6.2 EXAMPLE OF INTERNAL ALCOHOL POLICY: THE WORLD ORGANISATION OF THE SCOUT MOVEMENT .... 20
   6.3 EXAMPLE OF YOUTH ORGANISATION ACTIVITIES ON ALCOHOL ........................................ 20
1. Background to the European Youth Forum Working Group

In November 2004 the General Assembly of the European Youth Forum voted to include health in its work plan for 2005—2006. In the same year, the Eurocare Bridging the Gap (BtG) project, funded by the European Commission, was established to create a European alcohol policy network to further the development of an integrated Community strategy to reduce alcohol related harm in the context of a larger Europe. A key strand of the project was the involvement of young people.

It was in this context that the European Youth Forum (YFJ) was approached to facilitate a consultation with youth organisations on the issue of alcohol and young people. In July 2005, the YFJ Bureau thus launched a call for 6 representatives from Member Organisations to constitute the Working Group on alcohol policy. Around the same time, the European Youth Forum had started to participate in the European Policy Centre facilitated roundtable on alcohol policy which was a key consultation process with NGOs and alcohol industry ahead of the EU alcohol strategy.

The group’s mandate was to explore the issues facing young people in relation to alcohol, and generate a youth input into alcohol policy-making. In this endeavour the group aimed at ensuring the views of young people were part of an integrated approach in the development of alcohol policy. To achieve this aim a survey was designed, which focused on a wide range of issues relating to alcohol policy and which was distributed to all members of the European Youth Forum to obtain the views of youth organisations.

During the course of the work, the group reviewed literature on alcohol. Of particular significance were the findings of the principles of the 1995 European Charter on Alcohol, the 2001 WHO Ministerial Conference on Young People and Alcohol, and the European Council recommendations on the drinking of alcohol by young people. These documents served to provide a basis for the work and contained a number of important recommendations which the Working Group endorses and feels, if implemented, would provide a robust framework of evidence based policy measures to help prevent and reduce alcohol related harm throughout Europe.

Throughout the year, the group communicated through email and a series of teleconferences - exchanging ideas and sharing information on policy development and practice on alcohol throughout Europe. In the period between meetings, the members of the group worked on the formulation of policy positions on alcohol that formed the basis for a position paper proposed to the YFJ members. Reports were also prepared for the European Commission and Eurocare on the work of the group, and the survey responses received from youth organisations were collated and analysed, with the results then serving to inform the work of the group. Members of the group also participated in meetings of the Pathways for Health project to inform their work and contribute to the project.

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1 Independently established by youth organisations, the European Youth Forum is made up of more than 90 National Youth Councils and International Non-Governmental Youth Organisations, which are federations of youth organisations in themselves. It brings together tens of millions of young people from all over Europe, organised in order to represent their common interests. For more information, see www.youthforum.org

2 The members of the Working Group and their nominating organisations are: Merilyn Dafla (National Council of Hellenic Youth Organisations; www.esyn.gr), Marte Haabeth Grindaker (European Good Templar Youth Federation; www.egtyf.org), Marie-Claire McAleer (National Youth Council of Ireland; http://www.nyci.ie), Charlotte Stenermark (World Association of Girl Guides and Girl Scouts; www.waggsworld.org), Piotr Swiniarski (International Federation of Medical Students’ Associations; www.ifmsa.org), and Vertti Kukkas (Finnish Youth Co-operation Allianssi; www.alli.fi). Joao Salviano, Bureau member responsible for Health in YFJ has also participated and led the work of the group.
2. Survey Analysis

2.1 Methodology
The survey was undertaken to obtain the views of youth organisations across Europe on what they believe are the important alcohol policy measures to protect young people from the pressures to drink and to prevent and reduce the harm done to them directly or indirectly by alcohol. The Working Group agreed a set of questions to form the basis of the survey. The questionnaire had a total of 27 policy items. Some of the items (10 items) were similar to those used in the Stakeholders’ views of alcohol policy questionnaire (Anderson & Baumberg, 2006). The questionnaire was divided into seven policy sections: youth environment (2 items), alcohol marketing (2 items), education and information (5 items), drink driving (4 items), price (2 items), availability (7 items) and the role of youth organisations (5 items). The purpose was to assess the importance of implementing the different policy measures as viewed by youth organisations. Each policy statement was scored on a scale from zero (meaning not at all important) to ten (meaning very important) and a don’t know category.

The questionnaire was distributed to the Member Organisations of the European Youth Forum with the aim of having a youth organisation from each of the EU Member States, be it a national young organisation or a national member organisation of an international youth organisation. Where more than one youth organisation responded from a country, the official national youth council was selected as representative of that country. The data was analysed using SPSSX (a statistical program commonly used in social science).

2.2 Survey Results
There were a number of countries where more than one response was received from youth organisations. However, given the stated aim of the survey only one response was included for any one country and priority was given to the official national youth organisation. Youth organisations responded from 16 of the 25 EU Member States and a further six youth organisations from non-EU countries responded. There were no statistical differences between the responses from the EU and non-EU countries in all but two of the policy items, which will be addressed later. Therefore, the results of the youth organisations from all 22 countries are presented together. Three international youth organisations also responded and those results are presented separately. For each policy item a score of 8 or higher was considered very important.

The results of all policy items for the 22 countries are presented in Table 1. The vast majority (86%) of the responding youth organisations believed it was very important to implement a policy that protected young people from exposure to alcohol marketing in youth environments. Youth environments were described as educational, sporting, recreational and entertainment. A somewhat similar number (82%) of youth organisations were in favour of protecting young people from exposure to alcohol availability in youth environments. Three-quarters of youth organisations expressed the view that all forms of alcohol marketing that appeal to young people should be prohibited by statutory regulation as a very important policy measure to be implemented.

Implementing education campaigns was strongly favoured both for building greater awareness and support for alcohol policy (96%) as well as a part of an overall strategy to prevent and reduce alcohol related harm (82%). Over two-thirds of the youth organisations believed it was very important that all alcohol advertising, promotion and sponsorship should carry health warnings determined by public health. A similar number believed that youth organisations should take a leading role in alcohol education in the non-formal youth sector. There was total consensus among youth organisations that drink driving should not

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3 The survey analysis and write-up of results was undertaken by Dr. Ann Hope, an experienced alcohol researcher, who is the Chairperson of the Big Task Force on Young People. She also participated as observer in all the meetings of the Working Group.

4 Bulgaria, Norway, Switzerland, Armenia, Russia, Iceland
be allowed. Two measures considered very important to combat drink driving were a common European maximum blood alcohol concentration (BAC .50mg %) level (86%) and random breath testing throughout Europe (82%).

Table 1: Importance of implementing alcohol policy measures

<table>
<thead>
<tr>
<th>Response from 22 countries in the European Region</th>
<th>Very important (8,9,10) %</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>YOUTH ENVIRONMENT</strong></td>
<td></td>
</tr>
<tr>
<td>1.1 All young people should be protected from the harm that can be done, directly or indirectly, by alcohol.</td>
<td>77.3</td>
</tr>
<tr>
<td>1.2 All young people (under the legal age for alcohol purchase) should be protected from exposure to alcohol availability in youth environments (i.e. educational, sporting, recreational and entertainment).</td>
<td>81.8</td>
</tr>
<tr>
<td><strong>ALCOHOL MARKETING</strong></td>
<td></td>
</tr>
<tr>
<td>2.1 All forms of alcohol marketing that appeal to young people (under the legal age for alcohol purchase) should be prohibited by statutory regulation.</td>
<td>77.3</td>
</tr>
<tr>
<td>2.2 All young people (under the legal age for alcohol purchase) should be protected from exposure to alcohol marketing in youth environments (i.e. educational, sporting, recreational and entertainment).</td>
<td>86.4</td>
</tr>
<tr>
<td><strong>EDUCATION AND INFORMATION</strong></td>
<td></td>
</tr>
<tr>
<td>3.1 Education campaigns should be part of a strategy to prevent and reduce alcohol related harm.</td>
<td>81.8</td>
</tr>
<tr>
<td>3.2 Education campaigns should build greater awareness and support for alcohol policy.</td>
<td>95.5</td>
</tr>
<tr>
<td>3.3 Youth organisations should take a leading role in alcohol education in the non-formal youth sector</td>
<td>63.6</td>
</tr>
<tr>
<td>3.4 All alcohol products should carry health warnings determined by public health (ministries of health/DG SANCO).</td>
<td>59.1</td>
</tr>
<tr>
<td>3.5 All alcohol advertising, promotion and sponsorship should carry health warnings determined by public health (ministries of health/European Commission).</td>
<td>68.2</td>
</tr>
<tr>
<td><strong>DRINK DRIVING</strong></td>
<td></td>
</tr>
<tr>
<td>4.1 Drinking and driving should not be allowed</td>
<td>100.0</td>
</tr>
<tr>
<td>4.2 Random breath testing should be in place throughout Europe</td>
<td>81.8</td>
</tr>
<tr>
<td>4.3 A common European maximum limit of alcohol blood concentration (BAC .50mg%) should be in place</td>
<td>86.4</td>
</tr>
<tr>
<td>4.4 A common penalties system for drinking and driving should be in place throughout Europe</td>
<td>59.1</td>
</tr>
<tr>
<td><strong>PRICE</strong></td>
<td></td>
</tr>
<tr>
<td>5.1 The minimum level of taxes on alcohol should be increased throughout Europe</td>
<td>63.6</td>
</tr>
<tr>
<td>5.2 Higher alcohol concentration beverages, such as spirits, should be taxed at a</td>
<td>72.7</td>
</tr>
</tbody>
</table>
proportionally higher level.

### AVAILABILITY

6.1 Alcohol is not an ordinary commodity and should be regulated at EU level in a way that prevents and reduces alcohol related harm  63.6

6.2 A common EU minimum age limit to buy alcohol should be in place  68.2

6.3 The minimum age to buy alcohol should be 18 years.  54.5

6.4 At national level, licensing laws should be regulated in a way that prevents and reduces alcohol related harm among young people  77.3

6.5 The health and social impact shall be considered before new retail alcohol outlets are opened.  72.7

6.6 Alcohol sales to intoxicated/drunk people should be prohibited.  72.7

6.7 Alcohol sales and licensing laws should be regularly enforced.  77.3

### ROLE OF YOUTH ORGANISATIONS

7.1 Youth organisations have a role to play in the formulation of public polices on alcohol at a European and national levels  68.2

7.2 Youth organisations should work with other NGOs and institutions to build capacity and raise awareness to prevent and reduce harm among young people.  81.8

7.3 Youth organisations should take the lead in local community actions to prevent and reduce alcohol related harm among young people.  63.6

7.4 Youth organisations, as a workplace environment, should have in place an alcohol policy to prevent and reduce alcohol related harm among its target groups and workplace staff.  63.6

7.5 The environment where youth programmes and activities are planned and implemented should be alcohol-free  54.5

Three-quarters of the responding youth organisations (73%) believed it was very important that alcoholic drinks with a higher alcohol concentration should be taxed at a proportionally higher level. Two-thirds (64%) of youth organisations strongly favoured an increase in the minimum level of taxes on alcohol throughout Europe. In the section on availability, the policy measures considered most important were national licensing laws that are regulated in a way that prevents and reduces alcohol related harm among young people and the regular enforcement of alcohol laws. A somewhat similar number (73%) of youth organisations supported a law that would prohibit alcohol sales to intoxicated/drunk people and were in favour of examining the health and social impact before new retail alcohol outlets were opened. Over two-thirds (68%) of youth organisations were in favour of a common EU minimum age limit for the purchase of alcohol. However, just over half (54%) considered a minimum age limit of 18 years for alcohol purchase as being a very important policy measure for implementation.

There was strong support (82%) that youth organisations should work with other NGOs and institutions to build capacity and raise awareness to prevent and reduce harm among young people. Over two-thirds (68%) of youth organisations believed they had an important role to play in the formulation of public policy on alcohol at European and national levels.

There were two policy measures where differences were observed between the EU and non-EU countries. Two-thirds of youth organisations from EU countries, considered as very
important, the implementation of a policy measure where alcohol products would carry health warnings determined by public health (minister of health/DG SANCO) in comparison to one-third of youth organisations from non-EU countries. A similar difference was observed where youth organisations from EU countries were more in favour of an alcohol free environment for youth programmes and activities than youth organisations from non-EU countries.

The top 12 alcohol policy measures considered very important in the survey from the responding youth organisations are summarised in Figure 1. There was strong support for the implementation of European wide policy measures to reduce drink driving, in particular the setting of a maximum BAC level of .50mg% and for random breath testing. The protection of young people from the harm that can be done to them directly or indirectly by alcohol was also strongly supported. A number of policy measures strongly favoured by youth organisations were protecting young people from exposure to alcohol marketing and alcohol availability in youth environments and statutory regulation to stop alcohol marketing which appeals to young people. Youth organisations also identified working with other NGOs and institutions to build capacity to prevent and reduce harm among young people. Education campaigns were seen as very important for building awareness and support for alcohol policy as well as part of a strategy to prevent and reduce alcohol related harm. National licensing laws that protect young people and the regular enforcement of such laws were also deemed very important.

Figure 1

Youth Organisations 12 most important alcohol policy measures for implementation
2.3 International Youth Organisations

Among the responses from the three international youth organisations\(^5\), there was total agreement (100%) on eleven policy measures they believed were very important for implementation (Figure 2). The international youth organisations were more inclined to prioritise the role of youth organisations in policy development, having workplace alcohol polices in place and taking the lead in alcohol education in the non-formal youth sector and in local community action on alcohol, in comparison to youth organisations from individual countries. The international youth organisations believed that all alcohol products should carry a health warning determined by public health as a very important policy measure for implementation. Specific drink driving countermeasures or licensing and enforcements policy measures were not included in their top policy priority list as was the case with youth organisations at the country level. However, given the low response rate among international youth organisations, the findings can not be taken to reflect the views of all international organisations. So caution should be taken when using the responses of these three international organisations.

![Figure 2: Top policy measures (total agreement) among three international youth organisations](image)

- Protect young people from exposure to alcohol availability in youth environments
- Prohibit by statutory alcohol marketing that appeal to young people
- Have education campaigns as part of overall strategy to prevent and reduce harm
- Youth organisation take lead in alcohol education in non-formal youth sector
- All alcohol products should carry health warning determined by public health
- No drink driving permitted
- Youth organisations have role in policy development at national and European level
- Youth Organisations should work with other NGOs and institutions to build capacity
- Youth organisations should take lead in local community actions on alcohol
- Youth organisations to have a workplace alcohol policy in place for staff and youth

2.4 Comparison of Youth Organisations with other Stakeholders Views

Ten of the policy items, as mentioned in the methodology section, were similar to those used in the survey questionnaire of Stakeholders’ views of alcohol policy (Anderson P. & Baumberg B. 2006). How different or similar were youth organisations (YO) views from government officials (GO), nongovernmental organisations (NGOs) and alcohol industry (AI) on the importance of implementing a range of policy measures? To examine this question, the mean value for each of the ten policy items for youth organisations was calculated. The mean values of the same ten policy items for the other stakeholders were taken from the published survey results (Anderson & Baumberg, 2006).

Youth Organisations (YO) views were very similar to GO and NGOs in all ten policy items examined (Table 2), in terms of the importance of implementing such policy measures. Youth organisations along with GO and NGOs differed from the alcohol industry (AI) on six of the policy measures including health warnings on alcohol products and on marketing material, a maximum BAC of .50mg% across Europe as well as common penalties for drink driving, an increase in the minimum tax level on alcohol throughout Europe, and higher tax on stronger alcoholic drinks. There were four policy measures which all groups supported - regular enforcement of alcohol sales and licensing laws, random breath testing, education

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\(^5\) European Democratic Students, World Association of Girl Guides and Girls Scouts, Active
campaigns to support alcohol policy and a health and social impact assessment for new retail outlets.

Table 2: Comparison of stakeholders views of the importance of implementing alcohol policy measures

<table>
<thead>
<tr>
<th>Policy importance</th>
<th>YO N=22 mean</th>
<th>NGO N=22 mean</th>
<th>GO N=23 mean</th>
<th>AI N=30 mean</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Education and Information</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.2 Education campaigns to build awareness and support for alcohol policy</td>
<td>8.9</td>
<td>7.2</td>
<td>7.0</td>
<td>8.3</td>
</tr>
<tr>
<td>3.4 All alcohol products should carry health warnings determined by public health</td>
<td>7.8</td>
<td>7.3</td>
<td>6.4</td>
<td>0.9*</td>
</tr>
<tr>
<td>3.5 All alcohol advertising, promotion and sponsorship should carry health warnings</td>
<td>8.3</td>
<td>7.8</td>
<td>8.0</td>
<td>1.6*</td>
</tr>
<tr>
<td><strong>Drink Driving</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.2 Random breath testing should be in place throughout Europe</td>
<td>8.7</td>
<td>9.3</td>
<td>8.8</td>
<td>8.7</td>
</tr>
<tr>
<td>4.3 A common European max BAC limit of .50mg% in place</td>
<td>9.0</td>
<td>9.1</td>
<td>8.1</td>
<td>0.9*</td>
</tr>
<tr>
<td>4.4 Common drink driving penalties system throughout Europe</td>
<td>7.7</td>
<td>7.7</td>
<td>7.2</td>
<td>3.3*</td>
</tr>
<tr>
<td><strong>Price</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.1 Minimum tax level on alcohol should increase throughout Europe</td>
<td>7.4</td>
<td>8.3</td>
<td>8.9</td>
<td>0.04*</td>
</tr>
<tr>
<td>5.2 Higher alcohol concentration drinks should be taxed at a proportionally higher level</td>
<td>8.1</td>
<td>7.8</td>
<td>7.3</td>
<td>3.1*</td>
</tr>
<tr>
<td><strong>Availability</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.5 Assess the health and social impact before new outlets are opened</td>
<td>8.4</td>
<td>8.0</td>
<td>7.2</td>
<td>5.7</td>
</tr>
<tr>
<td>6.7 Alcohol sales and licensing laws should be regularly enforced</td>
<td>8.5</td>
<td>9.1</td>
<td>9.1</td>
<td>9.6</td>
</tr>
</tbody>
</table>

* Anderson & Baumberg reported significant differences (p<.001)

2.5 Discussion

The findings of the survey indicate that youth organisations recognise the vulnerability of young people and the need for effective measures to protect them from alcohol-related harm. This is not surprising given that youth organisations work closely with young people on a continuous basis and have structures in place to listen and hear the voice of young people. The increases in binge drinking among young people over the last decade have highlighted the need for effective actions both at the European and Member State level (Hibell et al 2004, EU Council Recommendation 2001). Youth organisations are ideally placed to observe the risks and consequences of the harm done to young people directly or indirectly by alcohol.

In the survey, youth organisations acknowledged their important role in both the development of public policies on alcohol at European and national levels and in working with other NGOs and institutions to build capacity and raise awareness to prevent and reduce alcohol related harm among young people. The importance of youth participating in shaping decisions that affect their lives, including alcohol policies, has been acknowledged both by WHO (Declaration of Young People and Alcohol) and by the EU (Council Recommendation on the drinking of alcohol by young people, in particular children and adolescents) (WHO 2001, EU 2001).

The responding youth organisations recognise that to prevent and reduce alcohol related harm among young people a variety of effective policies need to be implemented. The most important alcohol policies identified were around measures to combat drink driving, to reduce young peoples' exposure to alcohol marketing, to build awareness and support for
alcohol policy and for better laws to regulate alcohol availability. In other words, policy measures that influence the environment where young people live. WHO has suggested that youth sport and leisure environments free of alcohol and alcohol marketing could help reduce the pressure on and provide a safer social environment for young people (WHO, 2006). Of the policies considered very important by the youth organisations, many policies were for implementation at the European level while others were deemed necessary at the national level.

At European level, the top specific policy measures strongly favoured by the responding youth organisations were; a common European maximum BAC level, random breath testing, education campaigns to build awareness and support for alcohol policy, the protection of young people from alcohol availability and marketing in youth environments, statutory regulations to prohibit all forms of alcohol marketing that appeal to young people. At national level, policy measures strongly supported were licensing laws regulated in a way to prevent and reduce alcohol harm among young people and regular enforcement of laws governing alcohol sales and licensing regulations. Many of the policy measures deemed most important by youth organisations for implementation have a strong evidence base of effectiveness in reducing alcohol related harm (Babor et al 2003; Anderson & Baumberg, 2006).

A comparison was made between the views of youth organisations in this survey and other stakeholders, using a subset of the policy measures common to both surveys (Anderson & Baumberg, 2005). Youth organisations had similar views to government officials and nongovernmental organisations on the ten policy measures examined. However, the alcohol industry differed (did not rate as important) from the other three groups on six key policy measures - a common max BAC level (.50mg%) and drink driving penalties throughout Europe, an increase in the minimum tax level across Europe, higher taxes on stronger alcoholic drinks, and health warnings on all alcohol products, alcohol advertising, promotion and sponsorship as determined by public health. The four measures that the alcohol industry favoured, as did youth organisations, governmental officials and nongovernmental organisations, were; regular enforcement of alcohol sales and licensing laws, random breath testing, education campaigns and an assessment of the health and social impact for new outlets. The alcohol industry did not support effective alcohol policy measures than would affect their business and profit. This is not surprising given that their responsibility it to their shareholders. However, the four policy areas favoured by the industry are policy measures that require a high and continuous cost factor for governments.

Youth organisations are the voice of young people in Europe and work for effective public polices that promote and protect the welfare of young people. The youth organisations from all over Europe that participated in this survey believe in the importance of implementing effective alcohol policies to protect young people from the pressures to drink and to prevent and reduce the harm done to them directly or indirectly by alcohol. The youth organisations showed strong support for a policy mix that includes measures to combat drink driving, to protect young people from exposure to alcohol marketing through statutory regulation and health warnings, to promote education as part of overall strategy and to have better laws and enforcement governing alcohol availability. A clear message is that youth organisations have a role to play in policy formulation at European and national level. There is also an interest among youth organisations to work with other NGOs and institutions to build capacity to prevent and reduce alcohol related harm among young people.
3. Key Recommendations of the Working Group on Alcohol Policy

3.1 Introduction

The Working Group on Alcohol Policy is made up of representatives from Member Organisations of the European Youth Forum (YFJ), which is also the body coordinating the group. The recommendations below are those of the Working Group and do not necessarily reflect those held by the European Youth Forum. Based on the work done by the Working Group, the Member Organisations of the YFJ will discuss the organisation’s position on alcohol policy.

3.2 Social and Economic Problems of Alcohol

Alcohol related harm can cause significant health, social and economic problems for society. Europe is not only the heaviest drinking region in the world\(^6\), but alcohol is also one of the highest risk factors for ill-health on the continent.\(^7\) Alcohol also constitutes a large economic burden through for example accidents, health costs, insurance etc. If a population starts using alcohol at an early age, these costs are likely to be larger (Anderson, P. & Baumberg, B. 2006).

Young people who begin drinking before the age of 15 are four times more likely to develop alcohol-related problems than those who begin drinking at 21. Consequently, there is a need to keep young people alcohol free for as long as possible, in particular those under 15.\(^8\) Moreover, young people are more susceptible to the risks of alcohol, as it remains the leading mortality factor of people aged 15 to 29 - accounting for more than 10% of youth female mortality and around 25% of youth male mortality. In addition, 6% of 15-16 year old students in the EU attribute their involvement in fights, and 4% their engagement in unprotected sex, to their consumption of alcohol; alcohol use is indeed often a contributing factor to many teen pregnancies (Anderson, P. & Baumberg, B. 2006).

3.3 Alcohol and Youth

It is evident that alcohol can cause considerable problems for children and young people, as well as for society as a whole. Many youth organisations working in countries significantly affected by alcohol-related problems play an important role in trying to influence public policy to prevent and reduce alcohol-related harm amongst young people. A significant number of youth organisations have the potential to reach out to a large part of the young population in Europe.

Alcohol related harm does not, of course, only concern the person drinking, but also those around them, and indeed, society as a whole. In this regard, all young people should be protected not only from the harm that alcohol can cause to them directly, but also indirectly. This concerns children and youth affected by domestic violence, violence in public places, drink-driving etc.

Young people are often unfairly depicted only as the perpetrators of alcohol-related problems rather than the victims. Such a portrayal fails to consider that alcohol related harm is prevalent throughout society and does not discriminate against age. It also fails to consider that the attitudes young people hold towards alcohol and drinking behaviour are often inherited from adults. In the determination of legislation and policy, we must all be cognisant of the fact that alcohol related harm is an intergenerational problem. Moreover, youth should not be considered as targets but rather as actors in combating alcohol related

\(^6\) Both the European per capita consumption and the disease burden from alcohol are twice the world average (WHO. 2005).

\(^7\) For example, in the EU alcohol is the third highest of twenty-six risk factors for ill-health behind only tobacco and high blood pressure (Anderson, P. & Baumberg, B. 2006).

\(^8\) For example, young people who begin drinking before the age of 15 are 4 times more likely to develop alcohol problems than those who begin drinking at 21 (Anderson, P. & Baumberg, B 2006). In this adolescent binge drinking is of particular importance.
problems. As a result, long-term approaches to address the problem are required and young people must be involved in the formulation of public policy on alcohol and other issues which affect them.

### 3.4 Role of Youth Organisations

The drinking behaviour exhibited by young people is strongly influenced by their peers and the attitudes surrounding them; this is one reason why youth organisations have an important role to play on this issue. They are, however, significant in many other respects as well; from raising awareness on alcohol-related issues within families or within society in general, to tackling the stigmatisation of alcoholism/alcohol dependence. Youth organisations can also be a bridge - promoting awareness campaigns and meetings in schools between parents and children, and can have a role to play in the reintegration of victims of abuse by providing spaces for young people. Moreover, youth organisations have an advocacy role and are an important forum for discussing issues; through both external communication, and internally, in view of the space they provide for young people to learn about their responsibilities. An internal discussion on relevant issues can often benefit individuals that are themselves affected by alcohol related problems.

Many youth organisations face a challenge in responding to the issue of alcohol in respect to young people under the legal alcohol purchasing age. Such challenges include, running alcohol free events, maintaining and promoting a youth work response that is supportive and non judgemental, as well as supporting and training volunteers. Youth organisations also need to challenge young people in a more proactive way, strengthening local relationships and partnerships; sometimes, addressing the issue implies challenging the attitudes and beliefs of staff and volunteers working with young people. There is also a need to look at ways to challenge the so called ‘drinking culture’. Youth organisations can play an important role in achieving many of the targets set out by policy makers, but this requires a clear strategy as well as support from wider society.

Working Group recommendations:

- Youth organisation initiatives on alcohol related harm should be supported by a European Youth Fund.
- To support the work of youth organisations on alcohol related harm, programmes should be put in place to empower young people and youth workers with methodologies, information, and techniques on how to deal with alcohol abuse.
- Youth programmes designed to focus on the needs of young people should be expanded. Such programmes should aim to enhance the social and personal development skills of their participants.
- Mechanisms should be established to promote youth participation and consultation with young people in public policy-making on alcohol and other issues which affect them.
- Youth organisations with participants under the age of 18 should have a policy or guidelines on alcohol, developed in line with best practice.
- The youth sector can campaign for the formulation and implementation of effective public policies throughout Europe to protect young people from alcohol-related harm.
- Youth organisations, as a workplace environment, could have in place an alcohol policy to prevent and reduce alcohol related harm among its target groups and workplace staff.

### 3.5 Youth Environments

The Working Group would like to reiterate a commitment made in the 1995 European Charter on Alcohol that “all children and adolescents have the right to grow up in an environment protected from the negative consequences of alcohol consumption and, to the extent possible, from the promotion of alcoholic beverages”. Keeping children and young

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9 Examples of such commitments are the WHO ministerial conference targets to “provide and/or expand meaningful alternatives to alcohol and drug use and increase education and training for those who work with young people”, “increase young people’s involvement in youth health-related policies, especially alcohol-related issues”, and “increase education for young people on alcohol”.

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people under 18 free from exposure to the negative consequences of alcohol is of paramount importance - particularly so in youth environments (i.e. educational, sporting, recreational and entertainment). Indeed, 82 per cent of the organisations responding to the questionnaire referred to earlier, rated this as very important. In this regard, youth organisations have an important role to play in keeping young people free from alcohol for as long as possible.

Working Group Recommendations:
- Investment should be made in facilities where young people can socialise in a safe “alcohol free environment”.
- Greater collaboration between youth services and the wider community when addressing alcohol related problems, should be ensured.
- The environment where youth programmes and activities for young people under the legal alcohol purchasing age are planned and implemented should be alcohol-free.

3.6 Education and Awareness Raising
96 per cent of responding organisations stated that education and awareness-raising on the dangers of high risk drinking was important. Although effective legislation is the most important tool, other methods such as awareness-raising should also be used if one is to reach several political targets.\(^\text{10}\) This was also reflected among the responding organisations of whom 82 per cent believe that education, as part of an overall strategy to prevent and reduce alcohol related harm, is important. Related to this is the role of non-formal and informal education. In the case of the former, youth organisations play a particularly significant role.\(^\text{11}\) Including the issue of alcohol related harm in all levels of formal education is also important.

It is imperative, in addition, to consider the role education plays in a youth sector response to alcohol misuse. Undoubtedly, education programmes can influence beliefs and attitudes about alcohol, however international evidence across several contexts and settings - including schools, colleges and within communities - concludes that educational strategies show little or no effect in reducing related harm. With this in mind, education should not be the lead policy measure, but rather a supporting but integral part of an overall strategy. This is not to say that education does not have a part to play in a multi-faceted approach to underage drinking and alcohol misuse, but rather that an over-reliance on education should be avoided.

Working Group recommendations:
- Funding should be provided for the education and training of young people in formal and non-formal education sectors on the prevention and reduction of alcohol-related harm.
- Raising awareness among teachers and parents, as well as other groups such as bar employees, on problems related to alcohol (for example domestic violence) is essential.
- All physicians should raise awareness on all subjects related to alcohol e.g. the risks during pregnancy, the risks of teenage pregnancy, and the protection of unborn babies).
- Education and training should be provided for youth workers on how to respond to young people on the issue of alcohol.

\(^\text{10}\) For example, the WHO ministerial declaration on young people and alcohol set as a target to «Ensure and/or increase access to health and counselling services, especially for young people with alcohol problems and/or alcohol-dependent parents or family members» and “Reduce substantially alcohol-related harm, especially accidents, assaults and violence, and particularly as experienced by young people”.

\(^\text{11}\) Non-Formal Education (NFE) is an organised process that gives young people the possibility to develop their values and competencies (attitude, skills and knowledge). In NFE activities and projects, participants are the main actors, directly and actively involved in their education and learning process. Informal education is the process whereby every individual acquires attitudes, values, skills and knowledge from daily experience, such as from family, friends, peer groups, the media and other influences and factors in the person’s environment. Youth organisations can play a particularly important role in relation to NFE as they influence young peoples’ attitudes.
3.7 Brief and Early Interventions

The purpose of early intervention is to detect high risk drinking and harmful drinking in individuals before or shortly after the early signs of alcohol related problems present themselves (Department of Health & Children. 2004). Brief interventions are intended to serve to motivate those engaging in high risk drinking and harmful drinking to moderate their alcohol use. Such interventions usually consist of one to three counselling and education sessions and have shown to be effective in reducing high risk and harmful drinking and the associated social and health problems. Brief and early interventions have the potential to play a significant role in reducing high risk drinking as part of an integrated alcohol policy.

Working Group Recommendations:
- Adequate and accessible youth counselling on alcohol/drug services should be provided.
- Provide education and training for parents on how to respond to their children on the issue of alcohol.
- Shelters should be established to provide for children and young people living in families affected by domestic violence. Such centres should provide support in terms of counselling and psychological support, legal aid, etc.

3.8 Promotion and Marketing

One of the issues rated of highest importance by responding youth organisations in the survey undertaken were restrictions on alcohol promotion and marketing. Alcohol promotion and marketing has a high impact in promoting drinking amongst youth. Evidence suggests that restricting promotion and marketing is an effective policy measure concerning alcohol related harm. In order to counter the diverse media for alcohol advertising, a multi-faceted response is required to prevent such promotion being targeted at minors. Furthermore, statutory regulation on alcohol marketing could be based on the Television without Frontiers Directive.

Working Group Recommendations:
- Label alcohol products with warnings about the dangers of alcohol (i.e. labelling in France alerting pregnant women to the dangers of alcohol consumption).
- Make restrictions based on audience profiles, e.g. a ‘watershed’ as to when and where alcohol advertising can be broadcast.
- No exposure should be allowed of alcohol marketing in educational, sporting, recreational and entertainment environments of young people.
- Alternative marketing techniques such as sponsorship and the Internet should be regulated.
- Committees to monitor the marketing of alcohol should be established, and on which civil society representatives (including youth) should be present.
- Alcohol marketing that appeals to minors should be prohibited.

3.9 Restricted Availability

Alcohol is not an ordinary commodity and should be regulated with social and health concerns being taken into account. All countries in the EU should prohibit the sale of alcohol to young people under a certain age. This limit tends to be 18 in northern Europe and 16 in southern Europe. However, four countries have no restrictions on the sale of alcohol to children in shops while others have higher age limits than 18 to buy alcohol. When it comes to age limits, the main issue is enforcement. The Working Group believes

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12 The vast majority (86%) of youth organisations believed it was very important to implement a policy that protected young people from exposure to alcohol marketing in youth environments. Youth environments were described as educational, sporting, recreational and entertainment. Three-quarters of youth organisations expressed the view that all forms of alcohol marketing that appeal to young people should be prohibited by statutory regulation as a very important policy measure to be implemented. Over two-thirds of youth organisations believed it was very important that all alcohol advertising, promotion and sponsorship should carry health warnings determined by public health.
that stricter control is required on the off-license trade including fewer licences, more restricted service hours and more regulation and law enforcement.\textsuperscript{13}

Working Group recommendations:
\begin{itemize}
  \item Increase the availability of low alcohol content beverages.
  \item Health and social impact should be considered before new alcohol retail outlets are opened.
  \item Law enforcement to counter under-age drinking should be stricter.
  \item The minimum purchasing age for alcohol should be at least 18 years of age and this should also be the common EU minimum age limit.
\end{itemize}

3.10 Price and Taxes
Evidence shows that increased availability (i.e. lower prices and longer pub opening hours) increases alcohol related harm. One of the most effective measures by which to reduce alcohol related harm is undoubtedly higher taxation on alcohol products (Babor, T. et al. 2003). At the same time, alcohol taxation generates a substantial income for national governments, which could in turn be used to support initiatives that tackle alcohol related harm. When setting excise duties health aspects should be considered.

Working Group recommendations:
\begin{itemize}
  \item Introduce a common EU minimum taxation dependent upon alcohol volume in beverages.
  \item Make sure that non-alcoholic beverages are always the cheapest option in bars, restaurants etc.
  \item Introduce an additional levy on alcoholic drinks, the proceeds of which would be ‘ring-fenced’ for the financing of local strategies for the provision of recreational facilities and services for young people.
\end{itemize}

3.11 Drink-Driving
It is estimated that drink-driving accidents in the EU cause 10 000 deaths every year, aside from those of the drink-drivers themselves (Anderson, P. & Baumberg B. 2006). At the same time, there are several effective policy measures that can be taken to prevent drink-driving. In the questionnaire sent out to youth organisations, actions against drink-driving were one of the questions rated with highest importance. Policy measures such as random breath testing and a maximum limit for alcohol blood concentration were also rated highly.\textsuperscript{14} The Working Group would therefore like to stress this issue. In addition to more effective and stronger regulations, there is a need for alternative methods of transportation, such as night-buses, in recognition of the fact that many young people use cars when going out because there are no alternatives.

Working Group recommendations:
\begin{itemize}
  \item Introduce alcohol locks in cars (in a first phase, only for those who have previously committed alcohol-related crimes, and professional drivers).
  \item Introduce a common penalties system for drinking and driving throughout the EU.
  \item There should be random breath testing throughout the EU.
  \item Promote free or reduce priced night-buses.
  \item Put in place a common maximum EU limit on blood-alcohol concentration (i.e. BAC 0.50mg%).
  \item Provide state support for victims and families affected by drink-driving.
\end{itemize}

\textsuperscript{13} In the questionnaire, 77 percent of the youth organisations believed that it was very important that ‘Alcohol sales and licensing laws should be regularly enforced’ and an equally large part of the respondents believed that ‘licensing laws should be regulated in a way that prevents and reduces alcohol related harm among young people’ at the national level.

\textsuperscript{14} There was total consensus among youth organisations that drink driving should not be allowed. Two measures considered very important to combat drink driving were a common European maximum blood alcohol concentration (BAC .50mg %) level (86%) and random breath testing throughout Europe (82%).
4. Conclusion

A policy-mix and integrated approach is needed for policies to be effective. The formulation and implementation of alcohol policies needs youth involvement. Youth organisations have a role to play in the formulation of public policies on alcohol at both European and national levels. Youth organisations should work with other NGOs and institutions to build capacity and raise awareness to prevent and reduce harm amongst young people.
5. Summary of WG Recommendations

Role of Youth Organisations
- Youth organisation initiatives on alcohol related harm should be supported by a European Youth Fund.
- To support the work of youth organisations on alcohol related harm, programmes should be put in place to empower young people and youth workers with methodologies, information, and techniques on how to deal with alcohol abuse.
- Youth programmes designed to focus on the needs of young people should be expanded. Such programmes should aim to enhance the social and personal development skills of their participants.
- Mechanisms should be established to promote youth participation and consultation with young people in public policy-making on alcohol and other issues which affect them.
- Youth organisations with participants under the age of 18 should have a policy or guidelines on alcohol, developed in line with best practice.
- The youth sector can campaign for the formulation and implementation of effective public policies throughout Europe to protect young people from alcohol-related harm.
- Youth organisations, as a workplace environment, could have in place an alcohol policy to prevent and reduce alcohol related harm among its target groups and workplace staff.

Youth Environments
- Investment should be made in facilities where young people can socialise in a safe “alcohol free environment”.
- Greater collaboration between youth services and the wider community when addressing alcohol related problems, should be ensured.
- The environment where youth programmes and activities for young people under the legal alcohol purchasing age are planned and implemented should be alcohol-free.

Education and Awareness Raising
- Funding should be provided for the education and training of young people in formal and non-formal education sectors on the prevention and reduction of alcohol-related harm.
- Raising awareness among teachers and parents, as well as other groups such as bar employees, on problems related to alcohol (for example domestic violence) is essential.
- All physicians should raise awareness on all subjects related to alcohol e.g. the risks during pregnancy, the risks of teenage pregnancy, and the protection of unborn babies.
- Education and training should be provided for youth workers on how to respond to young people on the issue of alcohol.

Brief and Early Interventions
- Adequate and accessible youth counselling on alcohol/drug services should be provided.
- Provide education and training for parents on how to respond to their children on the issue of alcohol.
- Shelters should be established to provide for children and young people living in families affected by domestic violence. Such centres should provide support in terms of counselling and psychological support, legal aid, etc.

Promotion and Marketing
- Label alcohol products with warnings about the dangers of alcohol (i.e. labelling in France alerting pregnant women to the dangers of alcohol consumption).
• Make restrictions based on audience profiles, e.g. a ‘watershed’ as to when and where alcohol advertising can be broadcast.
• No exposure should be allowed of alcohol marketing in educational, sporting, recreational and entertainment environments of young people.
• Alternative marketing techniques such as sponsorship and the Internet should be regulated.
• Committees to monitor the marketing of alcohol should be established, and on which civil society representatives (including youth) should be present.
• Alcohol marketing that appeals to minors should be prohibited.

Restricted Availability
• Increase the availability of low alcohol content beverages.
• Health and social impact should be considered before new alcohol retail outlets are opened.
• Law enforcement to counter under-age drinking should be stricter.
• The minimum purchasing age for alcohol should be at least 18 years of age and this should also be the common EU minimum age limit.

Price and Taxes
• Introduce a common EU minimum taxation dependent upon alcohol volume in beverages.
• Make sure that non-alcoholic beverages are always the cheapest option in bars, restaurants etc.
• Introduce an additional levy on alcoholic drinks, the proceeds of which would be ‘ring-fenced’ for the financing of local strategies for the provision of recreational facilities and services for young people.

Drink-Driving
• Introduce alcohol locks in cars (in a first phase, only for those who have previously committed alcohol-related crimes, and professional drivers).
• Introduce a common penalties system for drinking and driving throughout the EU.
• There should be random breath testing throughout the EU.
• Promote free or reduce priced night-buses.
• Put in place a common maximum EU limit on blood-alcohol concentration (i.e. BAC 0.50mg%).
• Provide state support for victims and families affected by drink-driving.
6 References


6.1 Example of a Consultation Forum for Young People: The Irish Youth Parliament

A good model of youth participation in the formulation of public policy on alcohol and other policy issues affecting young people exists in Ireland.

Since 2002 Dáil na nÓg has operated in Ireland to engage and consult with young people on issues which affect them. Dáil na nÓg means ‘youth parliament” and is a chance for the children and young people of Ireland to represent the views of all Irish children at national level.

The Dáil na nÓg delegates have the chance to let the decision makers in Government know what they think of issues that affect their daily lives.

Dáil na nÓg meets once a year under the auspices of the Minister of State with Special Responsibility for Children. A report of the outcomes from Dáil na nÓg is published and submitted to the Cabinet Committee on Children.

The objectives of the Dáil are to:

- Provide a place where children, who are representative of the average Irish Child, can raise and debate issues of concern to them;
- Act as a tool for children's concerns to be fed into the development of public policy making;
- Provide a model for children's participation which can be developed at local level with links to the national Dáil;
- Support civic, social and personal development in children;
- Provide a centre for children to hear and learn about the experiences of other children growing up in Ireland.

Led by young people between the ages of 12-18, Dáil na nÓg is an opportunity for Young People to meet and discuss their views and recommendations on chosen themes as a group.

In 2005 the theme of Alcohol & Drug Misuse was the selected theme discussed by eleven Working Groups.

Young people had very different views on the most important issues concerning alcohol and drug misuse and even more diverse views on solving these issues. At the end of the Working Group discussions and the electronic voting, the delegates made their voices heard on all fifteen statements.

Through an effective follow-up process Dáil na nÓg ensures that the outcomes of the event are carried forward and addressed. A democratically elected Coiste group from Dáil na nÓg are supported by the National Youth Council of Ireland and the Office of the Minister for Children to lobby and advocate to progress the policy outcomes of the event. Such lobbying activities range from presentations to the relevant Parliamentary Oireachtas Committees to meetings with the various stakeholders on the key outcomes.

NYCI also incorporates the key policy outcomes of the young people’s deliberations at Dáil na nÓg into its campaign and advocacy work at a national and international level.

For further information please visit http://www.dailnanog.ie/2006/site/home.php
6.2 Example of Internal Alcohol Policy: The World Organisation of the Scout Movement

The World Organisation of the Scout Movement (WOSM) adheres to an internal alcohol policy which, inter alia, prohibits the organisation entering into partnership with an entity whose core business is the direct manufacture or sale of products widely recognised to be deleterious to health.15

Another example are the guidelines of the World Scout Jamborees that state: “The use of tobacco and alcohol is not permitted on the site. Some confined exceptions may be made for adults in accordance with the host country habits. Such exceptions should not create difficulties to participants. Drug consumption, under any form, is strictly prohibited. Furthermore, the laws of the country of the Host National Scout Organisation related to this matter are applicable.”

The last World Jamboree that took place in Thailand had the following rule: “For health, educational and safety reasons the WSJ is a non-alcohol event. Therefore it is not permitted to carry, consume or sell alcoholic drinks during the event. The Risk Management services may search participant’s property - preventively or for given reasons - and confiscate alcoholic drinks, which will not be returned.”

6.3 Example of Youth Organisation Activities on Alcohol

Many different youth organisations work on alcohol policy, an example being the Swedish Youth Temperance organisation (UNF) which is an organisation working for a world free from drugs. UNF has 7000 members in 100 local clubs all around Sweden.16

UNF is working within the fields of politics and prevention - through, for example, lobbying politicians and influencing public opinion through different types of campaigns and manifestations.

Within the field of prevention, efforts are mainly focused on activities in local clubs. UNF holds more than 10 000 different drug-free activities all around Sweden every year - from weekend camps on alcohol policy or dealing with drug addiction within family life, to weekly activities in our local clubs.

A lot of the work is also done in schools through UNF’s two prevention projects: UNG and VÅGA:
- VÅGA is a school project which is carried out during normal school hours together with teachers, parents; police and other local partners. The project is aimed at students in the 7th grade and comprises between 9 and 18 lessons.
- UNG is a project aimed at students in the 8th grade. The project is carried out during students’ free-time with students forming their own study group. The project focuses on issues important for young people, including on drugs and emotional issues.

15 See http://www.scout.org/front/docs/C0504corpart_e.pdf.
16 See www.unf.se
Introduction
The European Youth Forum set up a Working Group on Alcohol Policy to obtain the views of youth organisations on the issues, to develop a youth policy on alcohol and to have youth policy input into the European Union DG SANCO communication being prepared on alcohol policy.

Aim of questionnaire
The aim of this questionnaire is to obtain the views of national and international youth organisations on what they believe are the important alcohol policy measures to protect young people from the pressures to drink and to prevent and reduce the harm done to young people directly to indirectly by alcohol. A summary of alcohol policy issues and an explanation of terms is in an attached document.

Completion of the questionnaire
The answers to the questions should reflect the overall youth organisation’s response and not the opinion of the individual completing the questionnaire. The analysis will summarise the findings with a focus at European and regional levels. Therefore, individual organisation’s answers will remain confidential. The questionnaire is divided into different policy areas. Each policy statement is scored on a scale from zero (meaning not at all important) to ten (meaning very important) and a don’t know box is also available. It is preferable that you complete the questionnaire electronically as a word document.

If you have any queries, please contact Ludwig Hubendick
Please return the completed questionnaire as soon as possible and certainly by
**Name of Organisation:**

**Country:**

**Contact person:**

**Email**    __________________________

**Tel:** _________________________________________

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<tr>
<th>Alcohol Policy measure</th>
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1. **Youth Environments**

1.1 All young people should be protected from the harm that can be done, directly or indirectly, by alcohol

1.2 All young people (under the legal age for alcohol purchase) should be protected from exposure to alcohol availability in their educational, sporting, recreational and entertainment environments.

2. **Alcohol marketing (products, advertising, promotion and sponsorship)**

2.1 All forms of alcohol marketing that appeal to young people (under the legal age for alcohol purchase) should be prohibited by statutory regulation.

2.2 All young people (under the legal age for alcohol purchase) should be protected from exposure to alcohol marketing in their educational, sporting, recreational and entertainment environments.
### 3. Education and information

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<th>3.1</th>
<th>Education campaigns should build greater awareness and support for alcohol policy.</th>
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<td>3.2</td>
<td>Youth organisations should take a lead role in alcohol education in the non-formal youth sector</td>
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<td>3.3</td>
<td>All alcohol products should carry health warnings determined by public health (ministries of health/DG SANCO)</td>
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<td>3.4</td>
<td>All alcohol advertising, promotion and sponsorship should carry health warnings determined by public health (ministries of health/DG SANCO)</td>
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### 4. Drink-driving

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<th>4.1</th>
<th>Random breath testing should be in place throughout Europe</th>
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<td>4.2</td>
<td>A common European maximum limit of alcohol blood concentration (BAC .50mg%) should be in place</td>
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<td>A common penalties system for drinking and driving should be in place throughout Europe</td>
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### 5. Price

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<th>5.1</th>
<th>The minimum level of taxes on alcohol should be increased throughout Europe</th>
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<tr>
<td>5.2</td>
<td>Higher alcohol concentration beverages, such as spirits, should be taxed at a proportionally higher level</td>
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### 6. Availability

6.1 Alcohol is not an ordinary commodity and should be regulated at EU level in a way that prevents and reduces alcohol related harm.

6.2 A common European minimum age limit to buy alcohol should be in place.

6.3 The minimum age to buy alcohol should to 18 years.

6.4 At national level, licensing laws should be regulated in a way that prevents and reduces alcohol related harm among young people.

6.5 Impact assessments on health and social environments should be undertaken when opening new or changing existing retail outlets for alcohol.

6.6 Alcohol sales to intoxicated/drunk people should be prohibited.

6.7 Alcohol sales and licensing laws should be regularly enforced.

### 7. Role of Youth organisations

7.1 Youth organisations have a role to play in the formulation of public policies on alcohol at a European level.

7.2 Youth organisations should work with other NGOs to build capacity and raise awareness to prevent and reduce harm among young people.

7.3 Youth organisations should take the lead in local community actions to prevent and reduce alcohol related harm among young people.

7.4 Youth organisations, as a workplace environment, should have in place an alcohol policy to prevent and reduce alcohol related harm among its target groups and workplace staff.

7.5 The environment where youth programmes and activities are planned and implemented should be alcohol-free.
8. List, in descending order of importance, up to 5 of the policy measures that your youth organisation believes should be prioritised for implementation at European Level as a matter of urgency to prevent and reduce alcohol related harm among young people?

1.
2.
3.
4.
5.

9. List, in descending order of importance, up to 5 key youth policy measures that your organisation has implemented since 2001 that has helped to prevent and reduce alcohol related harm among young people?

1.
2.
3.
4.
5.

Additional Comments: