



Promoting Responsible Drinking

**RESPONSE OF THE PORTMAN GROUP TO WORLD HEALTH  
ORGANISATION STAKEHOLDER CONSULTATION ON HEALTH PROBLEMS  
RELATED TO ALCOHOL CONSUMPTION**

**Please enter your organization's views on the magnitude of health  
problems related to alcohol consumption: (max 300 words)**

The Portman Group (TPG) recognises that alcohol is a special substance that is capable of being misused and thus causing harm to health.

The health risk associated with alcohol misuse is dictated not only, or necessarily mainly, by how much an individual drinks, but by their pattern of drinking. One can identify three patterns of harmful drinking behaviour: drinking to intoxication; long term chronic misuse; and dependence. If one looks objectively at the patterns of alcohol consumption most associated with harm to health, drinking to intoxication or “binge drinking” is the pattern of drinking which is most highly correlated with death, injury and illness as well as potential years of life lost. This type of drinking is also a relatively prevalent behaviour in the UK compared with chronic misuse and dependence.

It is important, however, to recognise that alcohol is not inherently harmful in the same way as, for example, tobacco. Most adults drink moderately and responsibly, without causing harm to themselves or others in society. Indeed, there are recognised health benefits to certain sectors of the population from moderate alcohol consumption. There are also hard to quantify social benefits that are experienced by the many people who enjoy drinking moderately in the company of friends and family.

Government has both a duty and a right to help protect society against the adverse consequences of alcohol misuse, provided that it does this on the basis of the best available evidence and uses policy measures that are based, as far as possible, on broad consensus within society. Other stakeholders, including the industry, have a role to play in supporting these policies and doing whatever they can to reduce the health harms associated with alcohol.

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**Please enter your organization's opinions on effective interventions to reduce health problems related to alcohol consumption: (max 300 words)**

Although the industry's marketing of alcohol is a relatively weak influence on consumer drinking behaviour, it is important that it is done responsibly. In 1996, TPG introduced its Code of Practice covering the naming, packaging and promotion of alcoholic drinks. The Code is designed to ensure that drinks are marketed in a responsible way and only to those over 18 years of age. The Code thus protects both the public from exposure to harmful marketing and the industry from criticism over its behaviour. Complaints under the Code are ruled on by an Independent Complaints Panel. TPG provides an Advisory Service which offers guidance to the industry on compliance with the Code.

The Code is regarded as a gold-star self-regulatory system and has been used as a model by other countries. It has received praise from the UK Government, the media and other bodies including the Better Regulation Commission.

The real evidence, however, of the effectiveness of the Code is in the rate of compliance on the part of the industry with Panel decisions. This is proof that drinks producers, despite their commercial interests, can successfully self-regulate. During the ten year existence of the Code there have been over 150 complaints and approximately 70 products found in breach of the Code have been either withdrawn from the market or modified to comply with Code.

The number of complaints has been in gradual decline over the years. We believe this is down to the effectiveness of the Code, the increase in pre-launch advice requests and the drinks industry adopting a more responsible attitude to packaging and marketing.

The opposite trend is true of TPG's Advisory Service. There has been a consistent increase in requests for pre-launch advice and, in fact, 2006 is set to be the busiest year since it was established.

**Additional comments: (max 300 words)**

TPG was set up in 1989 by the UK's leading drinks producers. Our role is principally to encourage and champion the industry's commitment to social responsibility.

As well as adhering to the Code of Practice, our members practice social responsibility through various voluntary initiatives. They all unit label their drinks containers to allow the consumer to better understand their alcohol intake; they collectively set up a website to provide information on responsible drinking and they all promote that website through their brand advertising (to the value of over £150 million in 2006) and on drinks containers (over 3 billion in 2006); they all

train their staff in responsible marketing; they all have workplace alcohol policies; they have all pledged to contribute funding (over £2 million in 2007) towards a newly-constituted independent charity to carry out alcohol educational initiatives.

We are already working with the UK Government and other stakeholders to reduce the health problems associated with alcohol. We firmly believe that strategies based on a harm-reduction approach (concentrated on reducing alcohol misuse) are more successful in practice, as well as being fairer and more realistic in principle, than a strategy to reduce the overall alcohol consumption of a population.

Finally, the health harms associated with alcohol misuse are multi-faceted and often involve complex mechanisms. We believe that no one type of action is likely to reduce alcohol health problems on its own and that the only effective way of dealing with this problem is a broad policy mix which comprises (a) effective laws, and enforcement of those laws, governing sale and consumption; (b) appropriate and effective self-regulation by those who produce, advertise and sell alcohol, and (c) education and prevention interventions with a strong emphasis on individuals taking personal responsibility for drinking choices.

**David Poley**  
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