



## **Submission on the National Substance Misuse Strategy**

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**National Youth Council of Ireland**

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## **Introduction**

The National Youth Council of Ireland (NYCI) is the representative body for voluntary youth organisations in Ireland. The organisation was established in 1967 through the amalgamation of the principal voluntary youth organisations.

NYCI functions to represent the interests of young people and youth organisations. NYCI's role is recognised in legislation (Youth Work Act) and as a Social Partner. The NYCI aims through its member organisations and its representative role to empower young people to participate in society as fulfilled confident individuals. The work of the Youth Council is based on principles of equality, social justice and equal participation for all. In achieving these aims the NYCI seeks the emergence of a society in which young people are valued citizens who can make a meaningful contribution to their community.

## **Background**

NYCI believes that alcohol misuse is a serious issue facing all of Irish society. We have for some time been concerned about the negative consequences for young people of Ireland's alcohol problem. Our approach to the issue has been wide in scope, including:

- Building the capacity of youth organisations and youth-serving agencies to tackle the problem within their own work (through the National Youth Council of Ireland's Health Programme),
- Advocating the adoption and implementation of policies and actions which would reduce alcohol related harm among young people. This includes full participation in shaping public policy in the main arenas dealing with this area (the Commission on Liquor Licensing, the Strategic Taskforce on Alcohol, the Social Partnership process, the European Youth Forum and European Commission's Alcohol Strategy, Forum and Taskforces.
- Engaging in public debate on relevant issues through the media and other channels.

The Youth Council contends that the alcohol problem facing Irish society is an intergenerational one and does not discriminate against social class. It cuts right across the lifecycle and all sections of society. To effectively address this problem Government need to adopt a multi-faceted evidenced based strategy.

The development of the National Substance Misuse Strategy presents an opportunity for legislators and stakeholders to work together to ensure that a coherent and integrated response to both alcohol and drug misuse is adopted.

NYCI welcomes the opportunity to contribute to the development of the national substance misuse strategy to complement the current National Drugs Strategy. The Youth Council recognises the importance of integrating the work on alcohol misuse with drug misuse and for the purposes of this submission will focus solely on alcohol policy.

## **This Submission**

This submission will address the nature and prevalence of alcohol abuse and the impact on society. It will highlight the important role the youth sector plays in reducing alcohol related harm. The submission will also outline the Council's position in respect of the **3** of the **5** pillars of the National Drugs Strategy namely: **supply, prevention, and research**.

The submission will outline our proposals on the ways and means of ensuring effective integration of alcohol policy into an overall substance misuse strategy. We believe, these proposals, if implemented fully, have the potential to effectively reduce substance misuse.

## **The Current Situation**

### ***The Prevalence & Impact of Alcohol Related Harm***

NYCI is primarily concerned about the levels of alcohol misuse among children and young people under 18 years and the high levels of alcohol related harm. Over a 10 year period (1991 – 2001), alcohol consumption per capita increased by 41% in Ireland - the highest rate of increase in Europe. The vast majority of alcohol related harm occurs among the adult population. The incidences of death from alcohol abuse/dependency increased by a factor of four, cirrhosis

doubled and alcohol poisoning almost doubled. Since 1996, public order offences increased by 247%, assaults by 82% and drink driving offences by 125%. One in four attending the hospital emergency room are presenting with alcohol related problems.

The past 10 to 15 years have seen an upsurge of commitment at international level to addressing the alcohol issue. Ireland is a signatory to a number of crucial documents setting out strategy, policy and action plans to tackle the drink question such as the WHO European Charter on Alcohol, 1995, the WHO European Alcohol Action Plan, 2000 - 2005, and the WHO Declaration on Young People and Alcohol, 2001. At a national level, Ireland has commissioned a series of reports (Commission on Liquor Licensing, 2003, the Strategic Taskforce on Alcohol Report, 2004) and highlighted Alcohol Misuse as a Special Initiative under Sustaining Progress 2003 - 2005).

More recently the Government has incorporated alcohol as part of the broader National Substance Misuse Strategy and established a steering group to develop measures and action to tackle alcohol misuse as part of that overall strategy. Such a move is promising and it is hoped will ensure a more coherent and joined up approach to prevention and reduction of substance misuse.

A 2006 study<sup>1</sup> revealed that drinking amongst young people is prevalence throughout Irish society and spans all socio economic groups. The report revealed that a number of alarming figures in relation to the extent to which young people drink:

- 26% of children of all ages had a drink in the past month.
- Up to 51% of 15-17 year old girls had a drink in the past month
- Up to 15% of 12-14 year old boys had a drink in the past month
- 32% of children admitted to being “really drunk”
- Up to 37% of boys 15-17 admitted to being drunk in the last month
- Up to 41% of girls 15-17 admitted to being drunk in the last month
- Up to 12% of girls 12-14 admitted to being drunk in the last month

## ***Impact of alcohol related harm on young people***

Risky drinking can pose immediate dangers to the health and safety of young people such as accidents and fights, unprotected sex, impact on educational achievement, affect personal and family relations, lead to crime/difficulties with the Gardai, etc. Research<sup>1</sup> is also showing the long term impact of early, frequent and heavy drinking by young people. Over the last decade has also shown that alcohol affects an adolescent brain differently from an adult brain. In adolescence the brain goes through rapid development and ‘wiring’ changes and alcohol use can cause alternations in the structure and function of the developing brain. Alcohol can damage two key areas, the prefrontal cortex responsible for self-regulation, judgment, reasoning, problem solving and impulse control and the hippocampus which is involved in learning and memory. Damage from alcohol use during adolescence can be long term and irreversible.

Not only do Irish people drink too much, drinking patterns are excessive and problematic. A recent study showed that adults in Ireland had the highest reported consumption per drinker, the highest level of binge drinking and experienced more harm than other European countries. Binge drinking is the norm among Irish men: out of every 100 drinking occasions, 58 end up in binge drinking for men and 30 for women. In 2002 fewer children under 15 years reported experimenting with alcohol, drinking on a regular basis or getting drunk, in comparison to 1998. However, for those 15-17 years there was no reported change in the overall pattern of drinking, where about half of the boys and girls were regular drinkers and drunkenness was prevalent.

## Policy Solutions

There are a number of key policy solutions to address the alcohol problem. The following measures are grounded in a strong evidence base and if implemented, would contribute to reducing the prevalence of alcohol related harm. The measures are outlined under the pillars of supply, prevention and research respectively.

### **Pillar 1 - Supply**

#### **Price**

The evidence confirms that increase in price greatly reduces alcohol consumption and in turn alcohol related harm. Furthermore young people are particularly price sensitive. NYCI was opposed to the abolition of the 1987 Groceries Order in 2006 with respect to alcohol which had prohibited below cost selling and the 2010 Budget which reduced excise on alcohol by 20%. Alcohol is not an ordinary commodity, subject to the normal rules of commerce. This principle should be recognised in legislation by ensuring that alcohol is subject to greater controls in terms of monitoring of sales and service practices of licensed premises. The Government must act immediately to legislate to prevent below cost selling of alcohol. We also believe that Government should implement commitments in the Programme for Government to “*use the taxation system to promote low alcohol or alcohol-free products.*”

#### **Recommendation**

- The price of alcohol should be prioritised in the National Substance Misuse Strategy and every effort should be made to ensure that below cost selling of alcohol is prohibited as a means of reducing availability.
- Enact legislation to prohibit below cost selling of alcohol and use the taxation system to promote non alcoholic and low alcohol drinks.

#### **Reducing Availability**

Evidence suggests increased availability will increase alcohol related harm. One of the most effective ways of influencing a reduction in individual alcohol consumption and effectively

reduce alcohol related harm is to regulate and reduce the physical availability of alcohol through minimum age, restricting the number of outlets and time of sales. Ireland already has an adequate supply of licensed premises to meet demand, except in a very small number of areas. In fact the number of off-licences where alcohol can be purchased has trebled in 7 years to 2009<sup>1</sup> We believe that easy access to alcohol in supermarkets, convenience stores and petrol stations is contributing significantly to alcohol consumption, misuse and alcohol related harm among children and young people under 18. We believe that Government should reduce the current number of outlets where alcohol can be sold. We welcome the provision for test purchasing of alcohol by young people in the 2008 Liquor Licensing Act 2008, however this provision has not yet been commenced by the Minister which is disappointing.

### **Recommendation**

- Reduce the number of outlets where alcohol can be sold and introduce test purchasing.

### **Pillar 2 - Prevention**

The youth sector has the potential to influence a young person's behaviour in relation to substance misuse. The youth work sector has an integral role to play in empowering a young person with the personal and social skills to become confident individuals capable of making informed decisions. It is important to acknowledge the valuable contribution education in the youth work setting makes to informing children and young people about alcohol and drug use and the risks associated with risky lifestyle behaviour. In many circumstances this education provides the recipients with the coping skills to be able to respond to whatever situations life presents.

Many youth work programmes offer young people/youth workers working with young people training on health promotion on a range of health issues to encourage a healthy lifestyle.

Education has a role to play in addressing the prevention and reduction of alcohol-related harm; however, it is important to recognise that education on its own is not effective in reducing alcohol related harm. A recent study commissioned by the EU Health and Alcohol Forum<sup>2</sup>

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<sup>1</sup> Irish Independent, 11<sup>th</sup> February 2009

<sup>2</sup> Synthesis report on the effectiveness of alcohol education in schools in the European Union, Institute of Social Marketing and University of Stirling, September 2009.

concluded that “*education should be a minor part of a broader strategy*”. Education should not be a lead strategy but rather part of board policy mix of evidenced based effective measures to make an impact on reducing the rate of alcohol consumption throughout society. The education provided in the youth work setting is very important but only if it’s accompanied with a multi-faceted strategy to promote awareness of risky drinking and alcohol related harm and to change behaviour.

## **Recommendation**

- Support and adequately resource youth work organisations to continue to work with young people to empower young people with the knowledge and confidence to make informed decisions about their behaviour in relation to consumption of alcohol and use of drugs.

## **Regulation of advertising and marketing**

Marketing has an impact on behaviour in relation to the type of drinks and food children and young people consume<sup>1</sup>. Sophisticated longitudinal studies in U.S have suggested a causal link between alcohol marketing and youth drinking (Ellickson et al, 2004; Stacy et al, 2004; Snyder et al, 2006). A recent systematic review of the evidence base concluded that “alcohol advertising and promotion increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol” (Anderson et al).

The earlier children start to drink, and the more they drink at a young age, the more likely they are to suffer alcohol related harm, now and in the future. Alcohol marketing plays a significant role in young people’s decision to drink and in how they drink. Conclusions of a comprehensive review of the research was that there *is increasingly compelling evidence that alcohol marketing is having an effect on young people’s drinking*. Exposure of young people to alcohol advertising changes their beliefs and expectations about drinking and increases the likelihood of heavier drinking. Young people are particularly drawn to elements of music, characters, story and humour. Websites for promoting alcohol have also elements attractive to young people such as

the possibility to play games and competitions, download sound/music items and photo-galleries. Alcohol sports sponsorship links masculinity, alcohol and sport and embeds alcohol products into the everyday life of the consumer. It reaches the target audience – young males who are the keenest sports fans and heaviest drinkers.

Our study “Get ‘Em Young” demonstrated that children and young people in Ireland are exposed to a high and pervasive level of alcohol advertising and marketing through sixteen different channels. NYCI believes that the current “voluntary code” on alcohol advertising and marketing is weak, ineffective and lacks credibility. We believe that the current code should be replaced by an independently developed and monitored statutory code. NYCI also believes that the Government should move to implement their commitment to phase out the marketing and sponsorship of major sporting and cultural activities by alcohol companies.

### **Recommendation**

- Introduce a statutory code for regulation of advertising and marketing to restrict alcohol promotion targeted at young people under the age of 18.
- Phase out drinks industry marketing and sponsorship of major sporting and cultural events as committed to the Programme for Government.

### **Structural Separation**

In 2008 the Government enacted legislation which would ensure the “structural separation” of alcohol products from other products in mixed trading outlets. While the Act was passed the Government have chosen not to commence this part of the legislation. Instead they have chosen to defer this important measure in return for the implementation of a voluntary code devised by the retailers themselves. The first report on implementation claimed wide compliance, however it would appear they only plan to monitor the code once a year. We are concerned that even if the codes are breached, no sanctions or penalties can be applied. We are therefore calling on the Government to enact and commence section 9 as originally planned in line with recommendations of the independent alcohol advisory group established by the Department of Justice, Equality and Law Reform in early 2008.

## **Recommendation**

- Commence section 9 of the 2008 Intoxicating Liquor Act to provide for the structural separation of alcohol from ordinary products in mixed trading outlets (supermarkets, convenience stores and petrol stations).

## **Pillar 5 – Research**

Under the pillar of research, NYCI recommends that further research is done on alcohol marketing and sponsorship in Ireland. There is a dearth of national quantitative research assessing the exposure and impact of alcohol marketing and sport sponsorship on young people under 18.

## **The International Evidence**

The international evidence is overwhelming strong confirming the link between alcohol marketing and its impact on youth drinking.

The Report of an independent Science Group established by the European Alcohol & Health Forum of the European Commission conducted a review of longitudinal studies on the impact of marketing communication on the volume and patterns of consumption of alcoholic beverages, especially by young people. The scientific opinion of the Group concluded from the studies reviewed that alcohol marketing increases the likelihood that adolescents will start to use alcohol, and to drink more if they are already using alcohol.

## **National Research**

National data of this nature is vital to substantiate the international evidence that exists which confirms that alcohol marketing and sponsorship has a definite influence on when a young person takes their first drink, what they drink and the amount they drink on any one occasion.

## **Recommendations**

- Conduct quantitative research assessing the exposure and impact of alcohol marketing and sport sponsorship on young people under 18

- Independently evaluate the impact of the self regulated code restricting alcohol advertising in Ireland.

## **Conclusion**

This submission has outlined the nature, prevalence and impact of alcohol related harm in Irish society. It has described the important role the youth sector and the National Youth Council of Ireland play both at a policy and practice level to reduce alcohol related harm. It has identified key policy issues which need to be addressed (under **3** of the **5 pillars** outlined in the current National Drugs Strategy) as a matter of urgency to reduce supply and prevent alcohol misuse.

NYCI fully endorses the recommendations of the Report of the Strategic Taskforce on Alcohol (2004) specifically the measures outlined above to reduce supply and prevent substance misuse. These policy measures should be prioritised when the Steering Group defines the strategic direction the National Substance Misuse Strategy should take in relation to alcohol policy. Furthermore careful consideration should be given to the recommendations contained in the Report of Strategic Taskforce on Alcohol (2004). Consideration should also be given to ensuring that alcohol policy is integrated with the National Drugs Strategy in a coherent and complementary manner to reduce overall substance misuse.

## **Summary of Recommendations**

- Implement the recommendations of the Report of the Strategic Taskforce on Alcohol (2004).
- Prioritise the measures outlined in this submission under the pillars of supply and prevention of alcohol misuse in the National Substance Misuse Strategy.
- The price of alcohol should be prioritised in the National Substance Misuse Strategy and every effort should be made to ensure that below cost selling of alcohol is prohibited as a means of reducing availability.
- Enact legislation to prohibit below cost selling of alcohol and use the taxation system to promote non alcoholic and low alcohol drinks.

- Reduce the number of outlets where alcohol can be sold and introduce test purchasing.
  - Support and adequately resource youth work organisations to continue to work with young people to empower young people with the knowledge and confidence to make informed decisions about their behaviour in relation to consumption of alcohol and use of drugs.
  - Introduce a statutory code for regulation of advertising and marketing to restrict alcohol promotion targeted at young people under the age of 18.
  - Phase out drinks industry marketing and sponsorship of major sporting and cultural events as committed to the Programme for Government.
  - Commence section 9 of the 2008 Intoxicating Liquor Act to provide for the structural separation of alcohol from ordinary products in mixed trading outlets (supermarkets, convenience stores and petrol stations).
  - Conduct quantitative research to assess the exposure and impact of alcohol marketing and sport sponsorship on young people under 18
  - Independently evaluate the impact of the self regulated code restricting alcohol advertising in Ireland.
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