



Feedback from the German Social Insurance Europe Representation on the consultation excise duties on alcohol and alcoholic beverages – evaluation of excise duty rates and tax structures

The German Social Insurance (DSV) welcomes the consultation of the European Commission on the current legislation of excise duty rates and tax structures of alcohol and alcoholic beverages in the European Union (EU). The consultation process should aim to clarify the health-related aspects of alcohol consumption, thus contributing to a reduction in consumption thereof. Alcohol excise tax rate revisions must balance "public revenue" and "health protection".

Europe is still the region with the highest alcohol consumption worldwide. Cancer is the leading cause of alcohol-related deaths – an estimated 750,000 cases of cancer worldwide are related to alcohol consumption. In Germany, alcohol causes cancer in more than 20,000 people each year.¹ In this context, the pricing and fiscal framework of alcohol favours risky consumption.

Unlike tobacco, alcohol taxes have hardly been used to influence consumption over the last 30 years in Germany. One exception was the introduction of the "alcopop tax" in 2004, which led to a significant reduction in the demand for sweetened alcoholic beverages. In a European comparison, Germany is one of the countries with low alcohol taxes.²

At this point, the DSV hopes that the EU will provide significant impetus for its own prevention efforts. Excise taxes must be designed to discourage consumption of high alcohol content products and reduce affordability. The EU should use its leeway to create a framework for the taxation of alcoholic beverages that raises the minimum tax rates and provides targeted health impulses for the Member States via taxation.

In addition to alcohol pricing appropriate to health protection, the DSV supports the initiatives of the European Commission to review the Audiovisual Media Services Directive (2010/13/EU) with regard to advertising of alcoholic beverages, as well as existing alcohol sales promotion measures. Harmonised food labelling with nutritional information on packaging and labels are also important measures to reduce alcohol-related health damage.

According to the recommendations of the World Health Organisation, there is no such thing as safe alcohol consumption – it is always harmful³. Unfortunately, this finding was watered down when the final report of BECA, the European Parliament's special committee on cancer, was adopted in February 2022. It is therefore even more important that the European Commission fulfils its obligation to improve health protection and adapts existing regulations to this end.

1 Rumgay, H. (et. al): Global burden of cancer in 2020 attributable to alcohol consumption: a population-based study. *Lancet Oncol.* 2021 Aug;22(8):1071-1080. doi: 10.1016/S1470-2045(21)00279-5.

2 https://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/Alkoholatlas-Deutschland-2017_Auf-einen-Blick.pdf

3 <https://www.euro.who.int/de/health-topics/disease-prevention/alcohol-use/data-and-statistics/q-and-a-how-can-i-drink-alcohol-safely>