

Action for health taxes from policy development to implementation

Making the case for alcohol taxes



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1

Introduction

1.1. Background

Introduction

1.1. Background

Alcohol use is a leading cause of preventable death and disability worldwide. It is one of the world's largest risk factors for death and disability,¹ and the leading risk in middle income countries.² In 2019, alcohol resulted in 2.6 million deaths (4.7% of all deaths) worldwide.³ In per capita terms, the amount of alcohol consumed globally increased from 2000 to 2010 and then slightly declined from 2010 to 2019.³ However, in absolute terms, the total amount of alcohol consumed increased partly due to population growth.⁴

In addition to the massive impact of alcohol on unintended injuries, with the resulting health and social harms, the prevention of many other non-communicable diseases (NCDs), particularly strokes, liver disease, and cancers, can be significantly enhanced by lowering or preventing alcohol consumption and abuse. As with taxes on other unhealthy products, alcohol taxes create a price differential compared with substitute products not containing alcohol, meaning that products with alcohol become less affordable and are thus consumed less, leading to improved health outcomes.

Alcohol taxes, like all health taxes, are considered to be a 'triple-win' for governments in that they can lead to 1) improved population health, 2) increased government revenues, and 3) reduce health inequality.^{5,6} Reducing alcohol consumption through the use of alcohol taxation is identified by the World Health Organization as a "best-buy" in preventing and controlling the burden of NCDs.⁷ Furthermore, of all the health taxes now in common use, alcohol probably has the most untapped potential: despite being used as a fiscal tool for centuries and being implemented in over 86% of countries worldwide, alcohol taxes have yet to be utilized to achieve their fullest impact for population health, revenue generation and economic growth.⁸

This document supports policymakers and other stakeholders to implement alcohol taxes more effectively, with a focus on the political economy of alcohol taxation and on how policy processes are shaped at a national level. It is the third in a series of resources that provide a practical overview of approaches to support national stakeholders to develop, strengthen, and implement fiscal policies for health.

It provides a step-by-step approach to demonstrate how the Health Tax Action Framework can be applied to alcohol taxes.

This document focuses on excise taxes levied on alcohol. Governments may apply a variety of taxes on alcohol, including customs duties, value-added or general sales taxes, and excise taxes. Of these, excise taxes are the most important for promoting health because they can be applied in a targeted manner to raise the cost of alcohol products relative to other goods. Increasing excise taxes and prices on alcohol products is one of the key recommendations of the *WHO Global Action Plan for the Prevention and Control of Noncommunicable Diseases*.



2

The case for alcohol taxes

2.1. The current situation

2.2. Understanding alcohol

2.3. Why tax alcohol?

The case for alcohol taxes

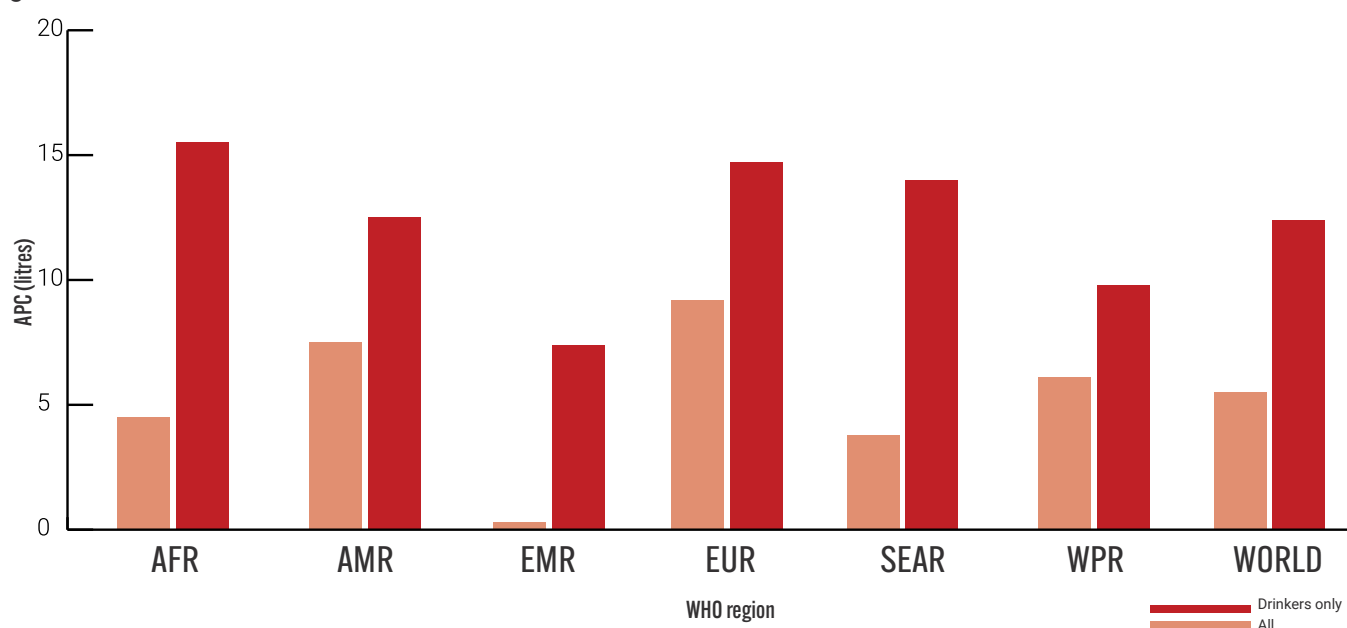
2.1. The current situation

2.1.1. Patterns of alcohol consumption

In 2019 an estimated 2.3 billion people globally were current drinkers (i.e. individuals having consumed a drink containing alcohol in the last 12 months).³ However, alcohol consumption patterns vary worldwide (Figure 1). Alcohol is mostly consumed in the form of spirits (44.8%), followed by beer (34.3%) and wine (11.7%).² To account for differences in the alcohol content of these beverages, alcohol use is measured and reported in liters of pure alcohol per year. In general, the highest alcohol per capita consumption (APC) among all adults is observed in the WHO European region. The highest APC among those who report drinking was in Africa and Eastern Mediterranean regions.²

Within countries, there are often groups with comparatively high levels of alcohol consumption. For instance, in the United States National Epidemiologic Survey on Alcohol and Related Conditions and the National Survey on Drug Use and Health between 2001 and 2005, there was a higher prevalence of alcohol consumption amongst white respondents, but greater levels of risky alcohol use and dependence in Black and Indigenous respondents.⁹ This translates to a greater burden of alcohol related harm in Black and Indigenous populations than the general population.^{9,10} Young people (aged 18–25 years) were also found to demonstrate risky patterns of alcohol use and unintentional injury caused by drinking.¹⁰ Moreover, consumption is rising in developing countries, which are least able to cope with the public health and social problems that alcohol consumption causes.¹¹

Targeting alcohol consumption through taxation may be especially important in regions with high overall consumption (such as Eastern Europe),¹² settings with high sub-group alcohol consumption, and in contexts with high tobacco consumption.^{13–15} Reducing alcohol consumption through taxation should be feasible in most LMICs, where there are currently low tax burdens on alcoholic beverages.¹⁶ Furthermore, considering that the harms from alcohol consumption are generally higher among more disadvantaged socioeconomic groups, reducing alcohol consumption should be a priority to attenuate health inequalities.

Figure 1. Alcohol per capita consumption (APC – Liters of pure alcohol in a year) by WHO region and the World (2019)Source: WHO³

2.1.2. Burden of disease

Alcohol is associated with over 200 health conditions, including NCDs, infectious diseases, injuries, and maternal and child health. It is the world's seventh largest risk factor for death and disability,¹ and the leading cause in middle income countries.² In 2019, alcohol resulted in 2.6 million deaths (4.7% of all deaths) worldwide.³ Alcohol consumption was predicted to lead to an additional 37 million cases of injuries, 24 million cases of cardiovascular disease, 10 million cases of cancer, and 5 million cases of cirrhosis based on simulations for the period 2020–2050 in 52 countries.¹⁷

Alcohol consumption is also associated with substantial costs that are not reflected in the market price of the products (negative externalities) including crime, violence, health system burden and loss of economic productivity.¹⁸ There are both immediate and long-term impacts of alcohol consumption; consuming high levels of alcohol leads to acute alcohol intoxication, which may contribute to interpersonal violence, accidents, injuries, and other forms of antisocial behavior. Longer-term, continued alcohol consumption and intoxication leads to alcohol dependence, or alcoholism, the inability for an individual to control the amount or frequency of alcohol consumption, which like any physical dependency, may contribute to the same set of outcomes mentioned before: crime, violence, accidents, and injuries.^{19,20} These two factors combine with the physiological impact of continued alcohol consumption and often become interrelated and reinforcing, leading to a cluster of health and social harms.

2.2. Understanding alcohol

To more effectively design and implement alcohol taxes, a useful starting point is to understand alcohol as a product. Alcohol is not an ‘ordinary commodity’.²⁰ It is a socially and economically embedded product that has substantial cultural and societal value attributed to it, despite the known harms associated with its consumption. On the one hand, it is recognized that alcohol use is a leading cause of preventable death and disability, that it contributes to health and social inequality, and that harmful use can be a drain on the economy through factors such as days missed at work or lower productivity due to alcohol consumption.²¹ On the other hand, alcohol is often seen as central to the agricultural, hospitality and entertainment sectors, and creates and supports an array of jobs and local economies. Alcoholic beverages accounted for global revenues of more than US\$ 1.5 trillion in 2019.²² Moreover, the alcohol industry has an increasingly consolidated global presence, investing in mature and comprehensive marketing and advocacy strategies.²³

Heterogeneity in the composition and categorization of alcoholic beverages (Table 1) makes it challenging to develop a standardized category for tax purposes (see Tax Design below). Moreover, national and subnational alcohol consumption behaviors can vary substantially (see Patterns of Alcohol Consumption, above), and so gathering local information on the types of alcoholic beverages consumed and their characteristics is important. For those interested in designing and implementing effective alcohol tax policy it is important to understand the landscape of alcohol production, sales, and consumption at the national level.

Table 1. Common alcoholic beverage types and typical alcohol by volume (ABV) ranges

Form	Category of alcoholic drink	Typical ABV range	Common types
Fermented	Beer	2-8%	Lager, ale, malt liquors
	Wine	5-25%	Unfortified (White, Red, Sparkling),
	Hard Cider	4.5-12%	Apple cider, Perry (Pear) cider
	Mead	8-18%	Honey wine
	Sake	15-17%	Japanese rice wine
	No/low alcohol	0-1.2%	No/low alcohol beers and spritzers

Form	Category of alcoholic drink	Typical ABV range	Common types
Distilled	Liquors and Spirits	35-90%	Gin, Brandy, Whiskey, Rum, Tequila, Vodka, Absinthe, Schnaps, Everclear
	Liqueurs	20-45%	Pastis, Sambuca, Campari, Amaretto, Jägermeister
Other	Alcopops	4-7%	Malt beverages plus fruit juice/flavorings, Wine plus fruit juice/flavorings, Spirits + fruit juice/flavorings
	"Moonshine"	40-60%	Locally produced distilled alcohol beverages (unregulated)

ABV refers to the percentage of a drink that is pure alcohol

Source: Alcohol change UK (ND), Nutrients Review (ND)

2.2.2. Unrecorded alcohol

Unrecorded alcohol refers to alcohol that is not accounted for in official statistics and that is usually produced, distributed, and sold outside the formal sector under government control.²⁴ Unrecorded alcohol can therefore be legal or illegal and can take several forms, such as illicit trade, home and small-scale artisanal production, consumption of surrogate alcohol, or cross-border alcohol shopping. In 2019, WHO estimated that 21% of all alcohol consumed worldwide was in the form of unrecorded alcohol, with a higher prevalence in the South-East Asian and Eastern Mediterranean regions.²⁵

A principal concern is that increasing alcohol taxes will lead to increased consumption and production of unrecorded alcohol. Alcohol consumption has been found to decrease as a result of higher alcohol taxes.²⁶ In addition, tax revenue losses from illicit alcohol trade can be significant. For example, in the United Kingdom an estimated 8% of alcohol tax revenue (equivalent to £1.2 billion) was estimated to have been lost each year.²⁷

While it is important to address unrecorded alcohol consumption, as part of multisectoral alcohol policies including taxation,²⁸ evidence seems to show little impact on unrecorded alcohol production and consumption from increases in alcohol taxes.²⁹ The alcohol industry consistently overstates these concerns in order to lobby against effective policy actions, particularly on alcohol tax and price policies.³⁰ Nevertheless, simplifying alcohol excise tax structures and increasing the share of alcoholic beverages that are subject to taxes can counter incentives to increase unrecorded alcohol production, particularly as

a result of tax avoidance.^{31,32} Tax stamps, track-and-trace systems, license systems and increased enforcement can also be used to reduce unrecorded consumption, but these may require new management and monitoring systems to be implemented and to function effectively.^{33,34}

2.3. Why tax alcohol?

Alcohol taxation has the potential to **1)** generate large health gains, **2)** raise public revenue, and **3)** reduce inequalities, while also being the most cost-effective way to reduce alcohol consumption.³⁵ Alcoholic beverages are an attractive target for taxation because of the health risks associated with their consumption, and their lack of essential nutritional value.

The health and economic burden

Alcohol consumption represents a large health and economic burden for society. Alcohol consumption yields a net negative impact on the economy through its negative impacts on human health. The health repercussions of alcohol consumption, including alcohol dependence, contribute to productivity losses, unemployment, reductions in the size of the labor market, and premature death and disability. Economic losses in high-income settings were found to represent as much as 1.5% to 2.6% of national yearly GDP.³⁶ In OECD countries, employment and productivity losses equal 32.7 million full-time workers per year and US\$ PPP 595 billion per year.¹⁷

Taxation reduces consumption

Alcohol taxes reduce alcohol consumption resulting in improved health. Studies have shown that alcohol taxes have been effective at reducing alcohol consumption, through their increase in price.^{37,38}

As the price of alcohol increases, its consumption decreases. It is generally thought that at least a proportional decrease in consumption is to be expected for any increase in price among all consumers and across all product types (See Box 1).

Increasing the price of alcohol through taxation can help halt progression to heavy drinking, reduce underage drinking, and shape consumer perceptions and preferences.³⁹ Studies have shown that alcohol taxes reduce alcohol consumption, drinking and driving, lower the frequency of diseases, injuries and deaths related to alcohol use and abuse, and contribute to reducing suicides, sexually transmitted diseases, and violence related to alcohol consumption.^{37,40,41} Further studies found reductions in the prevalence of lifetime drinking and delayed alcohol use initiation,^{42,43} and reductions in social inequalities due to alcohol-related harms.^{20, 44–49}

Box 1.

Alcohol price elasticity of demand

Most studies indicate negative price elasticities of demand for alcohol (the proportional decrease in consumption in response to an increase in price). Elder et al.³⁷ estimated median elasticities to be -0.79 for spirits, -0.5 for beer and -0.64 for wine. Differences in price elasticities may differ according to income. For instance, Chaloupka et al.⁵⁰ report values between -0.51 and -0.77 in high-income countries, and -0.64 in low- and middle-income countries. Moreover, responses to price differ according to drinking status, with heavier drinkers being less price responsive than moderate or light drinkers.^{41,51} Moreover, while heavier drinkers appear less responsive in terms of consumption, they are more likely to switch to cheaper alcohol products as prices increase. This highlights the importance of alcohol content-based specific excise taxes and tax floors (See Tax Design below).

Cost-effectiveness

Alcohol taxation is a highly cost-effective way to decrease alcohol consumption, meaning it has a relatively large effect on consumption for the resources required to implement it,³¹ and as such is considered a “best buy” for the prevention and control of NCDs.⁷ It has been estimated that implementing legislation to introduce or increase alcohol taxes has a low cost (<I\$ 0.10 per capita) and a large impact on alcohol consumption and improved health outcomes.⁵² The WHO SAFER initiative highlights alcohol taxes and pricing policies as one of the five high-impact strategies for reducing alcohol-related harms.⁵³

Supply-side effects

Changes in alcohol tax design can lead to changes in the behavior of producers, distributors and retailers of alcoholic beverages. These changes are known as 'supply-side effects'. Supply-side effects include reformulating drinks to contain less alcohol, changing the sizes of containers (usually to smaller units) but also shifting production towards particular or new products whose consumption would be thought to be less affected by the changes in the alcohol tax.

Raising government revenue

Alcoholic beverages represent an enormous potential source of tax revenue.²² A global study estimated that a one-time tax increase resulting in a 20% price change in alcohol products globally would generate over US\$ 9.4 trillion over 50 years, while a one-time tax increase resulting in a 50% price change would generate US\$ 17.8 trillion over 50 years.⁵⁴ Country-specific analyses find similar results. In South Africa, an increase in excise taxes on beer by 40% could lead to increased annual revenues of more than ZAR 14 billion (approximately US\$ 1 billion, or 0.3% of South Africa's GDP).⁵⁵ A modeling study that focused on raising taxes on beer and rum in order to reach target health impacts (reducing national alcohol consumption) found that, for 15 Caribbean Community (CARICOM) countries, an increase in taxes to obtain a 5% reduction in alcohol consumption would yield per-capita tax revenues of US\$ 4.91, larger than the cost delivering a package of essential noncommunicable disease interventions.⁵⁶

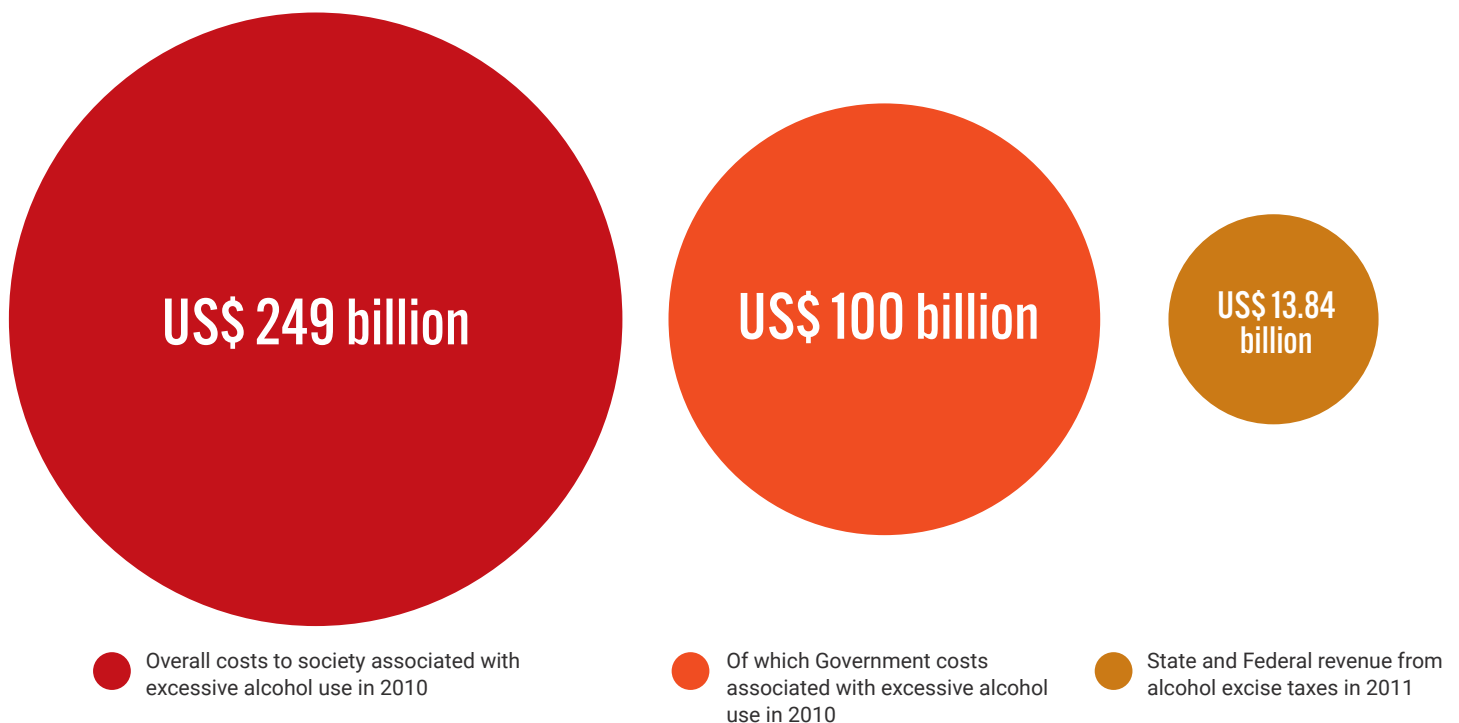
Reducing healthcare spending

Improvements in health from higher alcohol taxes would reduce future healthcare spending for both governments and households. It costs over I\$ 138 billion per year to treat alcohol-associated diseases; in OECD countries this equates to I\$ 61 per capita annually – around 2.4% of total health expenditure in those countries.¹⁷ This burden is increasing in developing countries, which are those least able to cope with the public health and social problems that alcohol consumption causes.¹¹ Given the expected rise in the global NCD-related burden of disease, opportunities to reduce future healthcare spending will become increasingly important.

Correct negative externalities and internalities

Alcohol consumption has both a social cost (e.g. healthcare spending) and an individual cost (e.g. ill health) to the individual, their family and community as well as to the government, which are not reflected in the price a consumer pays for an alcoholic beverage (Figure 2). Other negative externalities, including crime and violence, have often been used to justify governmental intervention.⁵⁷ By increasing the price of alcohol, alcohol taxes can be used to offset not only these social costs (externalities) but also unforeseen individual costs (called 'internalities'). Even when consumers are aware of potential negative health effects associated with alcohol consumption, they may overly discount such costs, and they are often exposed to aggressive product marketing highlighting the supposed benefits of alcohol consumption while failing to provide information about harms.³⁸

Figure 2. The economic potential of alcohol taxes: tax revenue and costs to society. Empirical evidence from the USA



Source: 58, 59

Improved equity

The burden of alcohol consumption and harms is not shared equally within and between countries. An important concept to understand is the so-called alcohol-harm paradox, where individuals in deprived groups experience higher rates of harm related to alcohol consumption

compared with those in advantaged groups despite drinking similar or lower levels of alcohol, due to the clustering of other risk factors in such groups.^{45,48,60} Alcohol expenditure can also exacerbate poverty in low-income households by taking up a significant proportion of income earned.⁶¹ There are also notable differences by gender. Men are more often current and heavier drinkers than women and as such have a higher prevalence of NCDs,⁶² although among heavy drinkers women develop more medical problems. Alcohol consumption is also associated with domestic abuse and sexual assault,⁶³ with a disproportionate impact on women. Certain regions, notably Eastern Europe, have significantly higher shares of the population who consume alcohol or who are heavy drinkers and have notably higher burdens of NCDs than other regions of comparable income or demographics.⁶⁴ Alcohol taxation is likely to reduce these inequalities.

“Alcohol taxation and pricing policies have several public health, economic and social benefits as they have the capacity to:

- 1) generate tax revenue,
- 2) reduce alcohol consumption and associated harms (covering both externalities and internalities) among various groups, including young people and heavy drinkers,
- 3) prevent the initiation of drinking, which is an important preventive strategy in low-and middle-income countries that have a high prevalence of lifetime abstainers.”

WHO Resource Tool on Alcohol Taxation and Pricing Policies

Source: 66

3

Alcohol taxes
and the health taxes
action framework

Alcohol taxes and the health taxes action framework

In "Action for Health Taxes: From Policy Development to Implementation", the Health Tax Action Framework was introduced to guide users of the document through the policy process and expand on the factors that support the success of health taxes (Figure 3).

These steps can be grouped into three main areas: understanding the broader policy environment, developing robust policy content, and advocating to ensure the policy is prioritized. In the following sections, the Health Taxes Action Framework will be applied to alcohol taxation.

Figure 3. Health Tax Action Framework



Source: Authors

4

The policy environment

4.1. Policy context

4.2. Policy actors and stakeholders

4.3. Legal and regulatory analysis

4.4. Policy objectives and framing the tax

The policy environment

4.1. Policy context

Developing a clear understanding of the policy context is a key part of efforts to introduce or amend alcohol taxation. In Toolbox 1 in Action for Health Taxes: From Policy Development to Implementation, the Multiple Streams Approach (MSA) was introduced to help explain why certain policies come to be seen as an idea “whose time has come”. This approach has been championed by alcohol tax researchers and advocates, as it demonstrates how policy change is influenced by the confluence of politics, policy, and prioritization streams. A number of case studies have brought together a rich set of information on the policy processes around the introduction (or the failed introduction) of alcohol taxes and provide models for understanding the political economy around alcohol taxation.^{65,66}

4.1.1. Trade and regional issues

Under the global move towards trade liberalization prevailing over the past decades, tariffs and other ‘price-distorting’ measures have been substantially reduced overall on alcohol as well as on other types of products.^{11,67} However, there is support under international law for governments to regulate to protect public health, including through the introduction of taxes for the protection of the health of their populations.

4.2. Policy actors and stakeholders

The introduction or modification of alcohol taxation requires leadership from the Ministry of Finance or an equivalent level of government, as well as input from other sectors including those related to commerce and trade, education, agriculture, and labor. Civil society organizations and academic research groups can also provide key support. Stakeholder analyses, as introduced in Toolbox 2 in Action for Health Taxes: From Policy Development to Implementation, can identify the relevant governmental and non-governmental actors and illustrate their relative influence and power.

In most settings, the Ministry of Health is likely to be a strong advocate of alcohol taxation. However, it is Ministries of Finance that often determine the success of alcohol taxation. When Ministries of Finance perceive alcohol taxes as aligned with their goals (such as addressing budget deficits), they can be a powerful advocate for policy implementation. However, if industry arguments about job losses and

economic productivity risks gain traction, support may waiver. Alcohol tax advocates should be prepared to address these threats and communicate with Ministry of Finance officials to pre-empt such fears.

Ministries of Agriculture may also be important stakeholders, with support likely to vary based on local agricultural production and Ministry priorities. For example, in settings in which sugar or potatoes are a key crop, an alcohol tax may be viewed as a threat to small farmers – an argument which is often amplified by industry stakeholders.⁶⁸ Other ministries may also play important roles and should be taken into account in comprehensive stakeholder analyses.

Outside of government, civil society organizations and academic centers can be essential in mobilizing public support for alcohol taxation, and the formation of strong pro-tax coalitions strengthen policy arguments.⁶⁹ CSOs with a focus on NCD prevention (rather than treatment only) are likely to be strategic advocates.

Finally, the alcohol industry itself is a very powerful group (including manufacturers, distributors, and members of the hospitality sector), but has private interests that conflict with the public interest.

Experiences in a number of countries have highlighted that the alcohol industry will adopt tactics similar to those used by the tobacco industry in an effort to defeat or dilute proposed alcohol tax policies.⁷⁰ Some of these strategies include presenting misleading arguments and attempting to sway the opinions of the public and policymakers, blocking attempts to promote campaigns.^{23,71,72} These are outlined further below.

4.3. Legal and regulatory analysis

4.3.1. Domestic legal framework

A useful starting point in alcohol tax policy is first to review the domestic legal environment and identify existing taxes and other price policies applicable to alcohol. It is important to understand how alcohol tax rates have previously been set in the country (e.g. through enactment of legislation, amendment of excise tax schedules, or by executive order). Lessons may be drawn from previous domestic experiences in implementing alcohol taxes or other taxes with a public health objective (e.g. tobacco taxes), including identification of which approaches might be most effective or which to avoid.

The legal infrastructure for the regulation of alcohol should also be reviewed, including the regulation of the marketing, sale or consumption of alcohol and alcohol-product labeling and related monitoring

mechanisms, which are necessary to support the monitoring and enforcement of alcohol taxation and may need to be strengthened; for example, alcohol-content-based taxes may require additional monitoring. Developing policy or policy amendments informed by an assessment of the legal environment will increase the likelihood of successfully producing policy change, as well as decreasing the threat of successful legal action by industry.⁷³

The National Constitution generally provides the government with broad taxation powers and the right and duty to protect public health. It may also guarantee the right to health as a fundamental right of individuals, supporting the right of governments to implement an alcohol tax with a public health objective. However, it is important to be aware of any limitations on government powers of taxation and of how the national courts have balanced the right to health and government's duty to protect public health with other fundamental rights, for example the right to engage in trade or to run a business.

It is also important to assess the government's specific authority (legislative mandate) to levy an alcohol excise tax. In most jurisdictions excise taxes are applied under the authority of a specific law. As above, any existing excise tax laws should be reviewed, and the scope, mechanisms and processes for amending such laws must be clarified.

4.3.2. Regional and international legal framework

It is also important to understand a government's obligations under international law applicable to alcohol taxes, particularly international trade agreements, regional trade agreements or customs unions to which the state may be party and International investment agreements, whether standalone or in investment chapters of free trade agreements.

Under a global move towards trade liberalization over the last decades, tariffs and other "price-distorting" measures have been substantially reduced overall (e.g. both on alcohol and on other types of products).¹¹ This is because governments are generally obliged to set upper limits, or to eliminate tariffs on imported goods including on alcoholic beverages.⁷⁴ There may also be limitations, or harmonization requirements, on taxes and pricing measures under regional customs unions. Opponents of alcohol taxation will often point to the risk of international legal challenges to taxes on imported alcoholic beverages⁷⁵ or threaten such challenges to deter governments from implementing alcohol taxes.

The most relevant obligation is an obligation to ensure that taxes do not discriminate, such as by favoring domestic over imported products. Discrimination can arise through the form or effect of a tax, and taxes should be applied equally to imported and domestic products.

There are a number of cases in which alcohol taxes with differentiated tax rates for different product categories have been found discriminatory under Article III of the General Agreement on Tariffs and Trade (GATT). None of those taxes, however, was designed to pursue an explicit health objective. If such a tax were inadvertently discriminatory in its effect, trade and investment agreements generally include exceptions allowing governments to protect public health (e.g. Article XX(b) of the GATT), applied equally to imported and locally manufactured products of a similar nature) and distinctions in tax treatment between product categories should be justifiable by reference to the government's health objective. Taxes should be not more trade restrictive than necessary to achieve a legitimate public health objective, and the government is in a stronger position if they are applied as part of a comprehensive framework of measures to reduce harmful use of alcohol and supported by evidence of effectiveness. It is also important to ensure that any procedural requirements such as notification of new or amended taxes and public comment periods under trade or customs agreements are complied with.

4.3.3. Possible grounds for legal challenge

While there are limits on the extent to which it is possible to generalize about the legal issues associated with alcohol tax in different jurisdictions, it is also possible to anticipate the types of legal challenges alcohol taxes may face. See Table 8 in *Action for Health Taxes: From Policy Development to Implementation* setting out some possible grounds for threatened or actual legal challenges under international and domestic law with their suggested evidence-based responses.

4.4. Policy objectives and framing the tax

The extent to which alcohol taxation has been framed for health reasons varies widely. Clear regulatory objectives identifying a domestic public health issue(s) based on evidence (local and international) and supporting a tax on alcohol products as an effective and cost effective measure in response to the identified issue(s) should strengthen the government position against potential legal challenges. However, in some settings, taxes have been successfully introduced as a way to finance important social programs.⁷⁶ Despite these differences in framing, behind the scenes, the need for revenue - either to make up for a budget shortfall or to fund new programs - has consistently been part of the context for the creation of a policy window around alcohol taxation.

Another important factor has been election cycles, with newly elected politicians more likely to enact taxes and politicians facing imminent elections less likely to do so.⁷⁷

Alcohol taxes will almost certainly face strong industry opposition, and successful implementation depends on countering industry efforts. Industry opposition and lobbying strategies in the policy environment will be outlined in more detail in Managing Industry Opposition below.

5

Policy content

5.1. Evidence base

5.2. Tax design

5.3. Public financial management and
tax administration

5.4. Earmarking

Policy content

5.1. Evidence base

5.1.1. Alcohol consumption patterns

Understanding baseline alcohol consumption patterns will help tax design and subsequent advocacy efforts. Given the variation in consumption between and within countries, it is important to identify country-specific analyses to provide the strongest evidence for policymaking.

Targeting alcohol consumption through taxation will be especially important in settings with high overall consumption of alcohol, such as Eastern Europe, settings in which sub-group consumption is high, and settings in which alcohol consumption is rising, such as South-East Asia and the Western Pacific.⁴

5.1.2. Mechanisms of impact

Alcohol taxes will lead to changes in health outcomes in several ways:

- **Increasing the price of alcoholic beverages and dampening demand.**

Alcohol taxes have been consistently shown to increase the price of alcoholic beverages and these price increases have been associated with decreases in sales of alcoholic beverages.³⁷ Different tax designs, baseline consumption patterns, and market dynamics can impact the extent to which taxes are passed on to consumers (the 'pass-through rate', see Box 2 below) and thus impact product price.

On average, an increase in alcohol taxes has been associated with a decrease in alcohol purchases, but in some countries, alcohol consumption, particularly for certain subgroups, may be less price-responsive.^{26, 41}

Any tax-induced price changes also should be interpreted in the context of changing affordability. As income increases, alcoholic beverages become relatively more affordable, particularly if prices remain stable. Affordability measures use an estimate of national income (e.g. gross national income per capita, gross domestic product per capita) to estimate the proportion of income needed to purchase a standardized amount of alcohol throughout the year (e.g. 10 liters of beer).

- **Changing public perceptions of alcoholic beverages.**

Alcohol taxes can signal to consumers that there are clear health risks with the consumption of alcohol. Signaling effects may be strongest in settings in which 1) there is a substantial health-related public debate around an alcohol tax, 2) citizens vote on changes to alcohol taxation, and 3) changes to alcohol taxes are presented with an explicit health framing. In addition to conveying information to consumers, alcohol taxes may contribute to shifting social norms around alcohol consumption.

- **Incentivising a range of industry reactions.**

The ways in which industry responds to the introduction of a tax (aside from price changes) may influence overall alcohol consumption. Some tax designs (for example, tiered taxes and taxes based on alcohol content in particular) create an incentive for alcoholic beverage manufacturers to reduce the amount of tax-liable alcohol in their products, or to change product sizes.

Regardless of tax design, alcoholic beverage manufacturers and their allies (such as the hospitality sector) may also respond to an alcohol tax by changing or tailoring marketing efforts to counter any messages about the risk associated with these products.^{71,73} They may also introduce new products, for example at a lower price point, to counteract the price impact of changes to alcohol taxes. Finally, multinational alcoholic beverage companies may respond to changes in alcohol taxes by focusing on targeting other countries and creating additional demand in other settings.⁷⁸

Understanding and anticipating some of these responses may enable policymakers to design changes to alcohol taxes in ways which maximize their effectiveness, and also to consider additional policy options (such as marketing restrictions, package warnings), which may work synergistically alongside alcohol taxes.

Box 2.

Tax pass-through

Tax pass-through is thought of as the impact on retail prices increase when taxes are increased. There are many determinants of the prices consumers face, and an increase in alcohol taxes may not necessarily result in an equivalent increase in the price faced by consumers. For instance, if a new tax of 50% is introduced on beer, breweries and distributors may choose to decrease their share of profit margin, resulting in a smaller percent increase in the final price, in order to prevent consumers from substituting to other goods.

Evidence from OECD countries and South Africa show that price increases in alcoholic beverages are relatively higher or equal than tax increases.^{79,80} However, tax pass-through rates can differ depending on the type of alcoholic beverage⁸¹ and the beverages' price band, with industry 'over-shifting' for more expensive beverages, and the opposite, smaller price increases relative to tax increases, or 'under-shifting,' for less expensive beverages.⁸² This can have implications for the kind, or intensity, of tax reforms to pursue, for instance pursuing tax measures that increase lower priced alcoholic beverages more than higher priced ones, to compensate for under-shifting.⁸ The level of competition in the alcohol market has also been found to impact levels of pass-through, with lower levels found in areas with higher levels of competition.⁸³

5.1.3. Anticipated impact

From a health perspective, the main considerations for tax design would be the expected reduction in alcohol consumption and associated health problems, and prevention of drinking initiation, particularly in countries with a high prevalence of lifetime abstinence.⁸⁴ From a financial standpoint, considerations include the expected magnitude of revenue to be collected, and the support mechanisms and investments needed to identify the tax base and collect tax revenues.⁸⁴

5.1.4. Existing policies

Understanding existing alcohol tax policy enables the identification of ways to strengthen existing taxes as well as opportunities for introducing new taxes. If alcohol taxes are not currently implemented, policymakers can look for information about other health taxes (such as tobacco taxes). In most countries, there is some sort of alcohol taxation in place.

However, in many cases the tax design could be improved to strengthen their health impact by amending their structure, tax rate, or the policy coherence around which products are taxed.

There are a variety of tax types (e.g. excise taxes, value-added taxes, import taxes, etc.) and designs, some of which perform better from a health perspective than others. Tax structures can vary substantially between countries.

It is helpful to explicitly identify the type of alcohol taxes that currently exist, including whether they are applied differentially across different types of alcohol products (distilled vs non-distilled beverages), whether they are comprehensively applied on all alcoholic products (e.g. on artisanal production, whether a uniform or tiered rate is used). Furthermore, it is useful to map what the current tax base and rate(s) are, and if possible, identify the amount of the annual revenue being raised.

5.2. Tax design

The technical aspects of alcohol tax policy and administration have been covered in depth in the recently published WHO technical manual on alcohol tax policy and administration¹³¹ and the WHO Resource Tool on Alcohol Taxation and Price Policies;⁸⁴ this should be referenced by national policymakers where possible. Understanding the technical nuances in tax design along with advantages and disadvantages may facilitate more effective engagement with finance authorities during the decision-making process of alcohol tax design. Of note, alcohol pricing policies are not a substitute for effective alcohol taxes and should rather be viewed as a complement to tax policy.

Tax policies can be designed to incentivize changes in the consumption trends of alcoholic beverages. These policies can differ significantly from setting to setting, including the type of tax system in place and at what level rates are set. Deciding how to tax alcoholic beverage products must involve consideration of the interplay of administrative capacity and the stated objective of the tax. For health purposes, alcohol taxes should be a form of excise tax so as to ensure the creation of a price differential of the taxed product with respect to healthier options. There are several key dimensions to consider in the design of alcohol excise taxes: the type of excise tax (e.g. ad-valorem, specific, or mixed), the tax structure (e.g. uniform vs. tiered), the tax base and the tax rate. The structure of taxes used should be tailored to the country context – different tax structures are more appropriate for certain levels of per-capita income, alcohol demand, market competition and structure, tax administrative capacity – and policy objectives.⁸⁴

5.2.1. Tax type and structure

Taxes typically collected on alcoholic beverages include sales taxes or value-added taxes (VAT), customs taxes and excise taxes.⁸⁴ Except for excise taxes, other tax types may fail to increase the relative price of alcoholic beverages (value-added taxes typically do not target alcoholic beverages specifically); may incentivize domestic production (import or customs taxes may increase local alcohol manufacture); may be vulnerable to international trade litigation (import or customs taxes may be seen as discriminatory); or may be less visible or salient to the consumer (sales taxes are sometimes not included in the shelf price of products, reducing their impact on consumers' choices). In contrast, excise taxes allow policymakers to target and raise the price of selected products, making them relatively less affordable and disincentivizing their consumption.

An overview of the advantages and disadvantages of different tax types are outlined in greater depth in Table 3 of *Action for Health Taxes: From Policy Development to Implementation*.

Excise taxes on alcoholic beverages can be either uniform or tiered/ varying rates. Uniform excise taxes have been shown to reduce alcohol consumption and related harms, and incentivize a switch to cheaper products.⁸⁴

Specific excise taxes

Specific excise taxes are often calculated based on the beverage volume, the amount of ethanol a beverage contains, but can also be calculated on other tax bases such as concentration of extract in beer. Specific excise taxation based on alcohol content is likely to lead to larger reductions in health inequalities across income groups and larger reductions in harmful drinking, with minimal effects on those drinking in moderation.⁸⁵ When the rate of an alcohol-content-based specific excise tax increases, the alcoholic beverage price per unit of ethanol will increase, which encourages reductions in consumption, because consumers observe an increase in the price of the drink without a change in its perceived value. Taxes based on alcohol content also create an incentive for industry to reduce the alcohol content of beverages. Alcohol-content-based specific excise taxes with automatic adjustments for inflation are a preferred tax design.

The unitary excise tax (volume-based-specific tax or volumetric-specific tax), is calculated based on beverage volume. Under unitary tax regimes, producers are encouraged to increase the range of high-quality

beverages, because there is no tax penalty associated with it. Unitary taxes also do not differentiate between high- and low-alcohol products (unless they are tiered, see below), nor do they create an incentive for industry to reduce alcohol levels.

Ad valorem excise taxes

Ad valorem excise taxes are calculated based on both quantity and price of alcoholic beverage (retail price, cost, insurance and freight (CIF), producer price) and are more difficult to administer than specific tax. Since the ad valorem rate is based on value, they generally do not have to be adjusted for inflation. When ad valorem rates increase, and the amount of ethanol in a drink and the value of the perceived qualities do not change, the price of the beverage per unit of alcohol will increase, which should decrease consumption in the short term. However, ad valorem taxes can encourage producers to produce higher ethanol content beverages, or lower priced alcoholic beverages, to reduce prices in response to taxes. This may be particularly relevant to heavier drinkers as they may be more likely to circumvent price increases by switching to cheaper beverages.⁸⁶ In addition, revenues from ad valorem taxes may be less stable since pricing (and reported prices) are subject to variability. With ad valorem excise taxes, the point in the value chain at which the product's value is assessed needs to be clearly defined (e.g. either the producer price, the final retail price). Applying an ad valorem tax to the producer price may substantially reduce the effective tax rate, since the tax is applied to a smaller proportion of the final value of the product. See Box 3 for an illustrated example.

Mixed systems

Many countries apply a mix of the excise taxes mentioned above, in so-called 'mixed systems'. The most common approaches are a combination of specific and ad valorem excise taxation. Some countries also apply minimum specific excise tax as a floor, and then an ad-valorem tax for higher price alcoholic beverages.⁸⁴ This tax structure, often referred to as "ad valorem with a specific floor" has been found to reduce total alcohol consumption among heavy drinkers, as well as prevent drinking initiation among young people (who prefer low alcohol content beverages upon initiation).^{84,88} Specific tax floor can also be used with a specific tax. For example, Latvia imposes an alcohol-content-based specific tax of €8.2 per hectolitre per degree alcohol on beers with a minimum volume-based tax floor of €15.2 per hectolitre.¹³¹ This tax structure is thought to have this effect because the tax due is never less than the specific tax rate, meaning low alcohol content beverages are more heavily taxed.⁸⁴

In sum, when deciding upon excise tax approaches, governments should evaluate their impact on alcohol consumption and the prevention of drinking initiation, as well as expected tax revenues and issues related to ease and feasibility of collection.⁴⁷ A comparison of commonly used excise taxes and their advantages and disadvantages can be found in Table 4 of *Action for Health Taxes: From Policy Development to Implementation*.

5.2.2. Tax base

The impact of alcohol taxes depends on the total amount of goods to which taxes are applied. The tax base varies according to method: a specific excise tax is based on alcohol content or a volume of the product and an ad valorem tax is based on the value of the product.

It is important that an alcohol tax includes all alcoholic beverages to avoid incentivizing substitution towards untaxed alcoholic beverages. There are several countries where some alcoholic beverages are untaxed, representing a large opportunity for alcohol tax reform.⁸ There are a few additional considerations to be made with ad valorem taxes and their tax base, as this depends on where in the value chain the tax is charged (see Box 3 below). For example, tax applied early in the value chain (e.g. CIF value, or on the producer price) will have a smaller impact on retail prices than tax that is applied on the final retail price. Tax applied early in the value chain is also vulnerable to transfer pricing and other tax avoidance tactics, particularly in highly vertically integrated industries.^{88, 89}

Furthermore, to maximize the signaling effect of a tax (i.e. information that prompts behavior change for consumers independently of the price pathway), the introduction or increase of alcohol taxes should be complemented with awareness raising and messaging around the health risks associated with alcohol consumption.

Box 3.

Implications of different tax bases for ad valorem tax structures

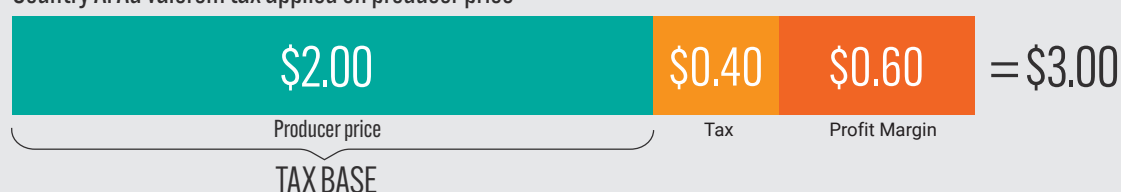
If an ad valorem structure is used, the choice of where in the value chain to assess the product's value is crucial. Some ad valorem taxes are applied to the producer price, and this introduces the risk that companies may underreport the value of the product. Even if no underreporting occurs, this structure diminishes the total value of the tax, because it does not capture the mark-ups that are applied after production. The way the choice of tax base may change the total impact on final prices is demonstrated in Table 2 and Figure 5 below.

Table 2. Impact of different tax structures on price following a 20% ad valorem tax on beer

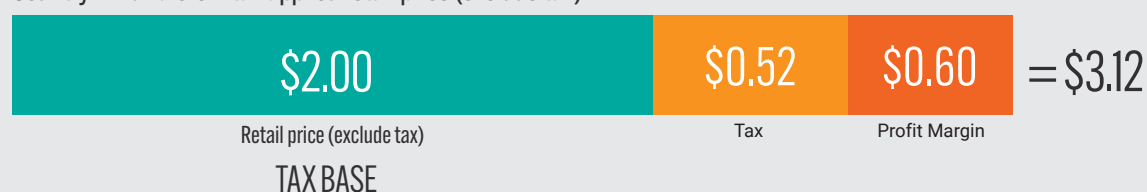
Components and summary measures of price	Country	
	A	B
[1] Producer price (same in both countries)	2.00	2.00
[2] Country A: Ad valorem tax on producer price (20%)=20% X [1]	0.40	-
[3] Retailer's and wholesaler's profit margin (same in both countries)	0.60	0.60
[4] Country B: Ad valorem tax on retail price (20%)=20% X ([1]+[3])	-	0.52
[5] Final price	3.00	3.12
[6] Pass-through rate	100%	100%

Figure 5. Impact of different tax base on price following a 20% ad valorem tax

Country A: Ad valorem tax applied on producer price



Country B: Ad valorem tax applied retail price (exclude tax)

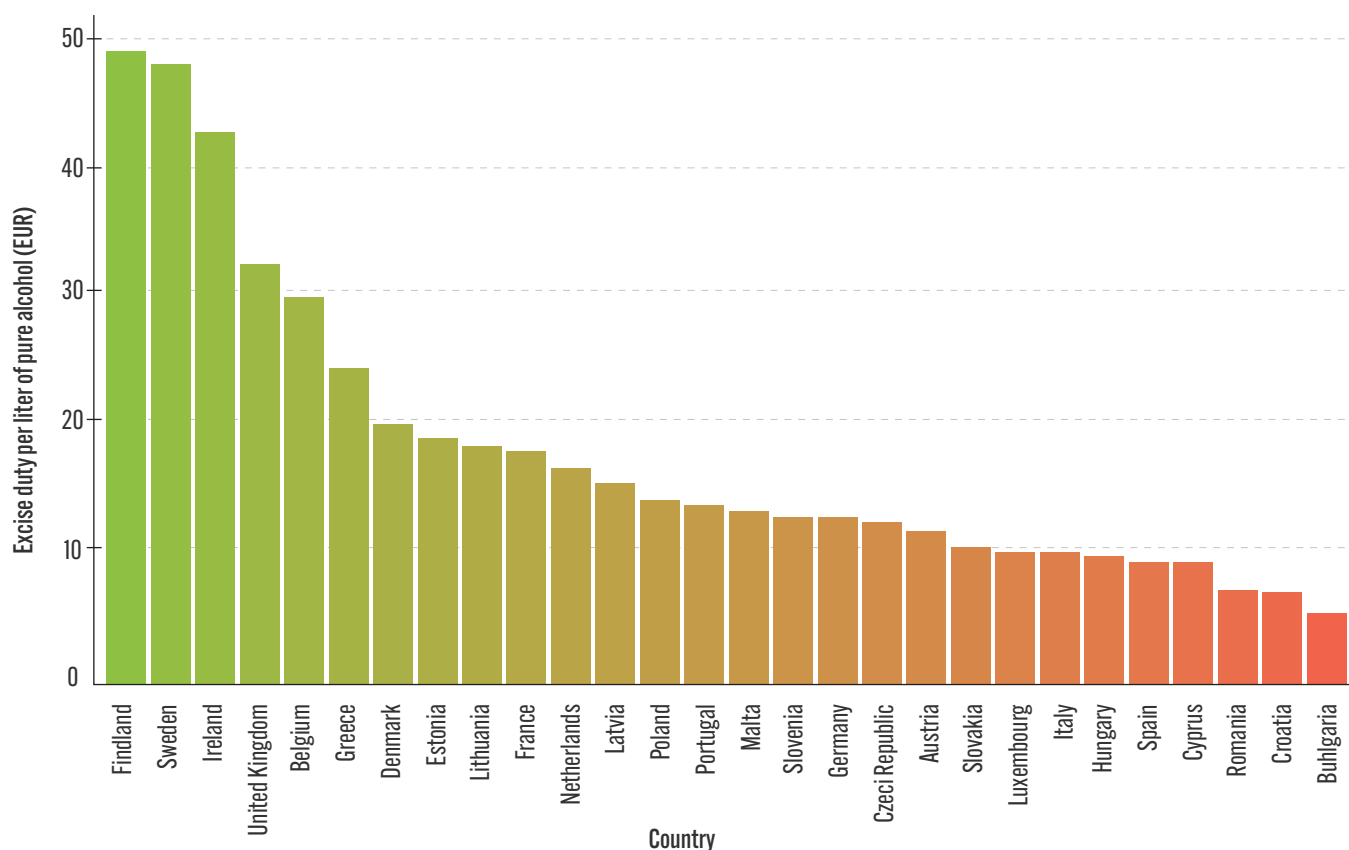


5.2.3. Tax rate

While WHO recommends that excise tax should represent at least 70% of the final retail price of cigarettes,⁹⁰ no similar recommendation currently exists for alcoholic beverages. From an economic perspective, an optimal level of taxation exists, where this tax adjusts the price of alcoholic beverages to include the negative internalities and externalities associated with their consumption.^{91,92} From a public health perspective, high levels of taxation are desirable as a deterrent to alcoholic consumption and to prevent a change of behavior among those who abstain from alcohol.

Unlike tobacco, there is a great deal of price and quality heterogeneity across and within different types of product classes (spirits, wines, beers). As a result, most countries use differential tax rates for different types of alcoholic beverages. For example, there is a 10-fold difference in the duty rate per unit of alcohol across EU member countries for each alcoholic beverage type.⁹³ Figure 6 illustrates the situation for tax duty on distilled alcohol (spirits and liquor) in the European Union in 2020.

Figure 6. Excise duties for distilled alcohol in EU Member States (January 2020)



Source: European Commission (98)

Differences in domestic tax rates may be the result of the existence of alcohol industries in specific countries, such that would result in lower tax rates on wine in wine-producing countries.⁹³ However, it may also be a deliberate policy choice, whereby alcohol taxes are calibrated to target a particular type of beverage, most often spirits.⁸⁴ Nevertheless, such tax policy may have both demand and supply side effects, pushing consumers and producers/retailers towards other types of alcoholic beverages with lower tax rates.

Nevertheless, consensus exists around a few recommendations. First, the principal mechanism that excise taxes work through is the result of higher prices faced by consumers. As such, alcohol excise tax rates should be high enough to reduce the affordability of alcoholic beverages. Furthermore, to counter the general trend of increasing household incomes in LMICs, in such contexts specific excise taxes should be raised periodically, as their real value and their effectiveness in reducing consumption tend to diminish over time if they are not adjusted to account for inflation and income growth.^{84,95}

5.2.4. Minimum unit price (MUP) and other pricing policies

Governments often apply a minimum pricing policy. In practice, in many countries this means a minimum price below which a fixed volume of alcohol cannot be sold to the public. For instance, in Scotland (where MUP was introduced in 2018) the minimum price for a 700 ml bottle of whisky with an ABV of 40% is £14.00. Such policies target heavier drinking in those who favor cheaper drinks, without significantly affecting the price of other more expensive alcoholic beverages.⁸ There is robust evidence that minimum pricing is highly effective and cost-effective in reducing alcohol consumption, alcohol-related hospital admissions, deaths, criminal offenses, and workplace absence.^{96,97} MUP is complementary to tax policies because it prevents producers and retailers from absorbing excise tax increases.⁹⁸ However, while additional revenue from alcohol taxes goes to the government, the additional revenue created with the MUP implementation will be accrued by the alcohol industry. Therefore, MUP should be seen only as a policy complementary to tax policies.

Other pricing policies include, but are not limited to, restrictions on below-cost sales. There is little evidence supporting the effectiveness of restrictions on below-cost sales and it may represent a significant administrative burden to establish the correct cost that should apply to

each alcoholic beverage type.⁸ Restrictions on discounting by alcohol retailers may reduce alcohol consumption but there is no evidence of a reduction in alcohol-related morbidity and mortality.⁹⁹ Evidence from Scotland suggests that restricting discounts for purchasing larger quantities is not sufficient; restricting all types of discounts, irrespective of purchased volumes, may be more effective.¹⁰⁰

5.3. Public financial management and tax administration

5.3.1. Earmarking alcohol tax revenues

An additional consideration around alcohol tax design is whether to earmark the resulting tax revenues. Earmarking means using some or all of the revenue deriving from a tax for a specific budgetary expense.¹⁰¹ Earmarking is part of the global discussion on domestic resource mobilization for health, particularly in low- and middle-income countries. In 2017, at least 80 countries earmarked revenue or expenditure sources for health.¹⁰¹ While earmarking protects revenues to be spent for a specific purpose and links taxation to benefits that can soften public resistance to taxation, earmarked revenues are prone to the influence of lobbies and can create rigidities in the budget that lead to the inefficient allocation of resources. Ministries of Finance may withdraw their support for alcohol taxation if other actors push too hard for earmarking.

Revenues from taxes on alcohol are typically not earmarked and applied to the general government accounts instead.^{54,84} In 2017, at least nine countries were identified as earmarking all or a portion of revenues from alcohol taxes for health.¹⁰² An example of the effective use of earmarked alcohol taxes for health is outlined in Box 4.

Decisions around whether and how to earmark alcohol tax revenue depend on country context, including the political economy context, budgeting laws and practices, and the degree of priority attributed by governments to specific policies.

Box 4.**Using alcohol tax revenues for health****Sustainable financing for health in the Philippines**

One of the most salient examples of the efficient use of alcohol tax revenues for health is The Philippines's "Sin Tax" reform in 2012. This reform significantly increased excise taxes on tobacco and alcohol and simplified the excise tax regimes from a multi-tiered ad valorem structure to a two-tiered structure which converged to one unitary rate by 2017. The minimum tax on the cheapest cigarettes was raised from P2.72 prior to 2012 to P12 in 2013, and later rose to P31.2 by 2018. Alcohol tax increases were lower but saw an increase in excise tax for the cheapest beer rise from P11 pre-2012 to P24.4 by 2018. Spirits are now subject to a specific tax of P20 per-proof liter (adjusted for annual inflation) and a 20% ad valorem tax.

Revenues generated from the "Sin Tax" law were earmarked to ensure a source of sustainable financing for the country's Universal Health Coverage Program. Fifteen percent of earmarked revenue goes towards tobacco farmer livelihoods. Of the remaining 85%, 80% finances health insurance coverage of the poor and elderly, and the remainder supports health facility improvements. In 2019 the base of earmarks was changed from incremental revenues to total revenues. In 2020 100% of alcohol revenues were earmarked for health.

Overall, the earmarks have expanded health coverage for over 15.2 million families, representing with their dependents about half of the Philippines' population.

Source: 103

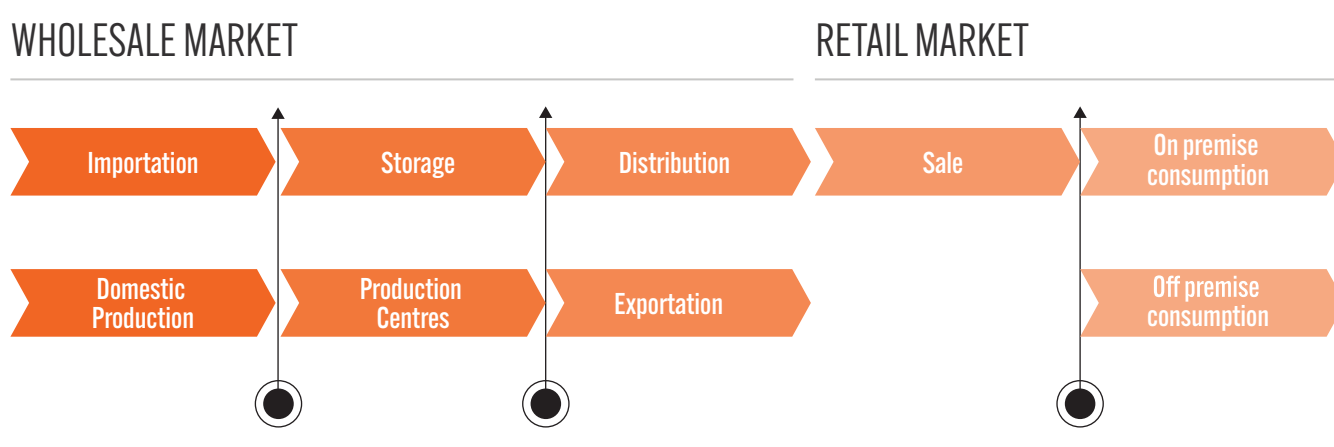
5.3.2. Tax collection and administration

In addition to the general design of alcohol tax policies, it is important to consider the actual collection of taxes, and the administration or management of these additional fiscal resources. This requires technical capacity, knowledge of the alcohol market in the relevant jurisdiction, and effective enforcement. Further guidance on public financial management and tax administration can be found in *Action for Health Taxes: From Policy Development to Implementation*.

Taxes may be collected at different points in the alcohol production process (Figure 7). This includes when beverages are imported,

domestically produced, released for distribution, or sold to consumers. Conventionally this is done when the product enters the wholesale or retail market. In order to effectively regulate and collect tax from importers, producers, distributors or retailers, tax administrators should ensure there is a good understanding of the quantity and variety of alcoholic beverages on the market. This information should be updated regularly to capture new products and markets.

Figure 7. Key points (indicated by stars and arrows) in the alcohol production, distribution and sales process where alcohol taxes can be collected



Source: Authors (based on 84)

As usual, there are incentives to avoid taxation. Details related to the collection, administration and enforcement of alcohol taxes are often an integral part of the policies or regulations that implement an alcohol tax. The WHO recommends that the following procedures are followed in order to enhance compliance with a tax regime:

- Request producers, importers and exporters register for tax purposes and obtain a license for production, distribution and retail sales.
- Monitor domestic production and trade activities by conducting physical controls and requiring tax stamps on alcohol products.
- Require taxpayers, including manufacturers and importers, to file tax returns and pay tax liabilities within a specific period of time after the alcohol products move from the factories or enter the country.

If successfully implemented, the above measures can make complete tax avoidance very difficult, actively monitor products on which alcohol tax should be collected and help keep track of the amount of alcoholic beverages produced and the taxes that should be charged. Registration and licensing is not only a prerequisite for tax compliance but also may help for health and safety purposes.²⁸

Compliance with alcohol excise taxes is based on cooperation between the taxpayer and national administrative body but must be enforced to ensure optimal revenue collection. Compliance is most often enforced through verification in the form of tax audits. Measures to combat tax evasion include conducting physical controls and using tax stamps. Physical controls involve in-person checks at the point of production or manufacturing. Tax stamps can also be used as part of a system of tracking, tracing and monitoring across the production and retail chain, and help authorities to distinguish licit from illicit products.⁸⁴ However, tax stamps can exist without full-blown track and tracing systems, as the latter can require significant investment and effort as a unique identifier on each item is an essential part of such systems.

An administrative structure for the collection and enforcement of taxes is a prerequisite for the implementation of alcohol tax. Administrative agencies connect tax policy with enforcement and the rule of law and thus are a critical element in ensuring effective alcohol tax implementation.⁹⁰ In countries with little administrative capacity, physical controls may be used to promote compliance with tax policies. Investing in capacity-building for tax administration systems will help ensure a strong system that can run efficiently, effectively collect revenue, and enforce compliance where necessary.

5.4. Monitoring and evaluation

The evidence base around the impact of alcohol taxes is robust. Monitoring and evaluation of the impact of alcohol taxes is an important step, both in generating local evidence of a tax's effectiveness, as well as to assess unanswered questions.⁸⁴ Monitoring and evaluation processes need to be planned alongside the implementation or reform of alcohol taxes. In settings in which soft or hard earmarking is used, a proportion of the revenue from alcohol taxation can be dedicated to these efforts.¹⁰²

In order to prevent lobbying to repeal alcohol taxes, evaluations can help policymakers by providing a strong evidence base on effectiveness. These evaluations should be high-quality and impartial to ensure that they are free from industry influence.

Beyond monitoring the impact of alcohol taxes, it is also important to contribute to global or regional monitoring to assess if tax levels are too low. To date, the information collected on taxes applied on alcoholic beverages is not sufficient to build summary indicators at global level.¹⁰⁴ Nevertheless, four recent studies have developed tax share estimates

for groups of countries; one for six countries using tax and price data from the International Alcohol Control Study,¹⁰⁵ one for 26 OECD countries using OECD tax data and price data from The Economist's Intelligence Unit,¹⁷ and the WHO Global Report on the Use of Alcohol Taxes.¹³² However, at the global level, alcohol taxes are monitored through qualitative data. Indicator 6C of the WHO Noncommunicable Disease Progress Monitor is considered achieved if excise taxes are applied on the three main types of alcoholic beverages (beer, wine, and spirits), no tax incentives or rebates for production of alcoholic beverages are applied, and an adjustment for inflation of the level of taxation is implemented.¹⁰⁶ Tax data are collected through the WHO Global survey on progress on SDG health target 3.5, which is also used to track information on per-capita alcohol consumption.¹⁰⁷ The data collected allow for describing the type of tax structure applied to alcoholic beverages and provides limited tax policy information. The information is reported for every WHO Member State in the WHO Global status report on alcohol and health and the WHO Global Information System on Alcohol and Health database.

Some regional mechanisms exist to monitor alcohol taxes. For example, in the European Union, all countries apply volume-based specific excise taxes on intermediate products (e.g. port, sherry) and content-based specific excise taxes on beer and spirits, regulated through Directives 92/83/EEC and 92/84/EEC, which define the tax structure, products taxed, and minimum rates applied. This harmonization of tax approaches allows monitoring and comparisons of excise tax levels across countries.⁹⁴ However, in most regional settings, where uniform tariff and trade policies do not exist, statutory tax rates cannot be used to compare taxes between countries because alcohol taxes vary substantially in terms of structure, base, rate, and products on which they are applied to.^{84,108} It is not straightforward to compare, for example, Argentina's 14% ad valorem excise tax on beer with Jamaica's JMD 1,230 specific tax per liter of pure alcohol, nor to tease apart tax effects across beverage types of varied alcohol content and volume sizes.

More recently, the Global report on the use of alcohol taxes assessed taxed applied to alcohol beverages at the global level and compared alcohol taxes and prices for the first time at the global level.¹³² In sum, while there is no clear consensus on how to optimally monitor and compare the alcohol tax policies of countries, the studies mentioned above have contributed to the evidence base that tax burdens on alcoholic beverages are generally low and suggest that there is ample room for increasing alcohol excise taxes.

6

Political advocacy

6.1. Cross-sectoral alignment

6.2. Public engagement

6.3. Managing industry opposition

Political advocacy

6.1. Cross-sectoral alignment

As discussed earlier, several government ministries are key in reforming alcohol taxation. Coordination between ministries does not always happen in practice, but without Ministry of Finance commitment, alcohol tax reform is unlikely to move ahead; without Ministry of Health support, key tax design decisions may not align with public health priorities. Ministries of Health and other allies have to be able to communicate using the concepts, terms and priorities that will resonate with Ministries of Finance.

For a Ministry of Finance, fiscal and economic motivations are most important. The stable and predictable revenue potential of additional or higher alcohol taxes should be clearly outlined. Arguments around the larger economy tend to be convincing, as is reducing absenteeism and presenteeism and boosting labor productivity and labor supply. Finally, an argument that may help relates to the social cost of alcohol consumption, and how taxes on the price of alcohol can move such products towards their real prices, taking into account their relevant internalities and externalities.¹⁰⁹

Even when several ministries are aligned behind higher alcohol taxes, where the introduction of a tax is subject to a legislative process (rather than being introduced, for example, by the executive branch of government) the political negotiations required for passage may lead to compromises in tax design (e.g. lowering tax rates or excluding particular alcoholic beverages),¹⁰³ which tend to weaken the impact and effectiveness of the tax.

In many places, key actors that would help support alcohol tax reform, such as national and sub-national governments and civil society organizations and interest groups, are not well-coordinated and effective multisectoral action is challenging.¹¹⁰ Strong leadership by Ministries of Finance and Health, and active engagement with these other actors can serve to counter opposition to alcohol taxation.¹¹¹

Key arguments for alcohol taxes can be thought of as either emphasizing a unified, whole-of-government approach, or as audience-specific messaging emphasizing particular benefits relative to others. Some of this messaging for cross-sectoral advocacy are summarized in more detail in Table 3 below.

Table 3. Key messages to advocate for alcohol taxes

Message	Key points
Alcohol consumption is a leading cause of preventable death and disability	<ul style="list-style-type: none"> • Seventh largest risk factor for death and disability globally • Causes over 2.6 million deaths • Reduces life expectancy • Drives dependence, injuries, heart disease, cancer, mental illness and other noncommunicable diseases. There are over 200 health conditions associated with alcohol consumption
Alcohol consumption harms more than physical health	<ul style="list-style-type: none"> • Associated with over 200 health conditions • Mental illness, dependence and addiction are the result of sustained alcohol use • Violence and injuries • Social impacts of alcohol • Economic impact of harmful use is substantial
Harmful alcohol consumption drains the economy	<ul style="list-style-type: none"> • Increased health expenditures • Decreased labor force participation • Reduce productivity • Lower than potential GDP
Alcohol is associated with health and social inequality	<ul style="list-style-type: none"> • Gender inequality: men are more likely to drink alcohol, and drink heavily compared to women • Socioeconomic inequality: morbidity and mortality higher in poorer drinkers despite similar or lower levels of consumption (alcohol-harm paradox)
Increasing alcohol price reduces alcohol consumption	<ul style="list-style-type: none"> • Reduces prevalence of lifetime drinking • Delays initiation of alcohol use • Prevents underage drinking • Halts progression to heavy drinking
Alcohol taxes contributes to improve health	<ul style="list-style-type: none"> • Reduces overall alcohol consumption • Prevents drink driving • Lowers frequency of diseases, injuries and deaths related to alcohol use and abuse, • Contributes to reducing suicides, sexually transmitted diseases, and alcohol-related violence and other crimes.
Alcohol taxes generate government revenue	<ul style="list-style-type: none"> • Enormous revenue generation potential
Alcohol taxes are effective and cost efficient	<ul style="list-style-type: none"> • It is a “best buy” for the prevention and control of NCDs • Low cost (< I\$ 0.10 per capita) and a favorable cost effectiveness ratio (< I\$ 100 cost per healthy life year gained) • Tax increases are the cheapest alcohol control policy to implement.
Alcohol taxes make economic sense	<ul style="list-style-type: none"> • Alcohol taxes boost the economy by improving labour force participation and productivity (preventing absenteeism, presenteeism, premature deaths and disability) • Revenue from alcohol taxes can be reinvested in job creation opportunities
Alcohol industry tactics must be actively managed	<ul style="list-style-type: none"> • Unrecorded alcohol: Increasing excise taxes does not necessarily increase unrecorded alcohol use and can be effective in decreasing overall alcohol consumption • Cross-border shopping: the impact of cross-border shopping on overall per capita consumption is limited • Distributional impact: Alcohol taxes may positively benefit the poor • Macroeconomic impact: Although they may impact the alcohol industry, overall alcohol taxes are a major boost for economies. • Employment: Alcohol-related job losses would be offset by job gains in other industries and sectors.

6.2. Managing industry opposition

The production, sale and consumption of alcohol are promoted by a global industry with sophisticated marketing, promotional and lobbying strategies. This is particularly the case for multinational corporations, who have used corporate political advocacy to influence national policy and regulations.¹¹⁸ When developing alcohol tax policies to prevent alcohol-related harms, industry representatives employ a myriad of arguments, often shifting the focus onto individual responsibility (See Table 4, below).¹¹⁹ The actors, interests, and power dynamics to be affected by changes to alcohol taxes should be made explicit to forge national consensus and/or mitigate the impact of industry strategies.

The opposition to alcohol taxes can extend beyond manufacturers and distributors of alcoholic beverages to include agriculture in countries that produce the products that serve as inputs to alcohol production, such as sugarcane; it can likewise include the hospitality sectors, where restaurants, bars and nightclubs generate revenue from the sale of alcoholic beverages, and it may also include chambers of commerce if alcoholic beverages are exported.²⁰ Approaches to alcohol taxation must take into consideration the ways in which alcohol is an economically embedded product, for example by mapping local industries that are supported directly or indirectly by the alcohol industry so that sectors that are impacted by alcohol taxes can be actively managed. It may also be possible to reduce the opposition of some of these sectors, particularly if the additional alcohol tax revenues can be used to address distributional effects of the tax.¹²⁰

The alcohol industry is closely aligned with the agricultural sector, which benefits from the demand for a wide array of primary ingredients – including fruits, grains, plant matter and dairy – to supply alcohol production. However, it is possible to engage with the agricultural sector and minimize its opposition to increasing alcohol taxes. First, just as the overall economy would benefit from higher alcohol taxes, so the agricultural sector would benefit from more productive laborers as a result of the health impacts of health taxes (which would predominantly benefit agricultural and farm workers). Second, particularly if public authorities agree to earmark some funds, agricultural sectors could be incentivized to alter the sale of their products towards alternative markets, such as bio-ethanol, or alter the selection of crops on their land, or the use of the land altogether, towards products that are not used as inputs to alcoholic beverage production.

The hospitality industry also relies on alcohol production and consumption. National hospitality industries are diverse and span tourism and travel, food and beverage, accommodation, recreation and other sectors. Each of these sectors depend to an extent on the sale and consumption of alcohol. The industry is characterized by a number of small and medium-sized businesses which may benefit directly from alcohol companies (i.e. through product placement or sponsorship) or indirectly (i.e. through patterns of behavior related to alcohol consumption). As with the agricultural sector, there are benefits to alcohol taxes, including those related to labor productivity and supply. Furthermore, experiences have found that diversifying tourism and leisure activities from a focus on binge drinking and alcohol consumption has led to increasing tourism and hospitality from other demographic groups. Furthermore, for workers in the hospitality sector, it would be useful to convey the overall net increase in jobs expected from higher alcohol taxes and how hospitality workers have highly transferable skills to other sectors.¹²¹

Anticipating the arguments that industry actors use can enable advocates to pre-empt them and prepare effective and evidence-based responses.³⁰ Common industry arguments and potential evidence-based responses are summarized in Table 4, also detailed in chapter 7 of the alcohol tax manual.¹³¹

Table 4. Common industry arguments and evidence-based responses

Industry argument	Example	Evidence-based response
Effectiveness	"The tax on alcoholic beverages is not the end of NCDs, road traffic injuries or even alcoholism"	Modeling studies have found that alcohol taxes are associated with reductions in overall mortality, obesity, diabetes, cardiovascular disease, and some cancers ¹ Industry actors often misrepresent the evidence or fund biased research to cast doubt on these impacts ³⁰
Cross-border shopping	Local jurisdictions will lose out if people go elsewhere to purchase alcoholic beverages because of a tax	The impact of cross-border shopping on overall average per capita consumption is limited. ¹²² Efforts for alcohol reform can also be done in conjunction with neighboring jurisdictions, to be implemented in tandem, or can take cross-border shopping, such as reducing allowances of alcohol that can be brought across borders and other similar policies. ^{84,123} The fear of the impact of cross-border shopping on tax revenues may push some countries to lower their excise taxes on alcohol. However, alcohol tax reductions will result in increased alcohol consumption and alcohol-related deaths, as was seen in Finland following the introduction of a single market for alcohol in the EU in 2003. ¹²⁴

Industry argument	Example	Evidence-based response
Regressivity	Alcohol taxes hurt the poorest families and widen inequality	<p>Furthermore, additional public spending based on tax revenue can benefit more lower socioeconomic groups.¹⁰³</p> <p>Taxes on health harming products like alcohol are not regressive. In fact, health taxes on products such as alcohol positively benefit the poor.¹⁰⁹ First, due to the alcohol-harm paradox, the harms from excessive alcohol use impact poorer drinkers' households more than richer drinkers across 25-33 countries in the studies.^{45, 48} Second, empirical research has found that the distribution of the tax burden of alcohol taxes is generally progressive, preferentially targeting higher income earners or heavy drinkers who spend relatively more on alcohol products.¹²⁵⁻¹²⁸</p> <p>Third, evidence from tobacco cessation demonstrates that poorer households are more sensitive to changes in commodity prices, thus benefiting relatively more from taxes in terms of reduced health care expenditures and increased productivity and lifetime income.¹²⁹</p> <p>Fourth, additional public spending, as a result of alcohol tax revenue, preferentially benefits poor or marginalized communities, thus increasing their progressive nature.^{21,130}</p>
Job losses / macroeconomic growth	“[the tax] is the end of neighborhood stores that provide income for the thousands of families who tend them.”	<p>Although they may impact the alcohol industry, overall alcohol taxes are a major boost for economies. Additional fiscal revenues will in-part contribute to increased government reserves, which contributes to macroeconomic stability and economic growth. Furthermore, the positive impacts on labor supply and labor productivity from decreases in alcohol consumption are significant.^{2,8}</p> <p>Finally, alcohol taxes have been associated with net job increases in high-quality evaluation studies,¹²¹ as additional jobs should be expected to be created in other sectors,⁸⁴ particularly in the public sector, as a result of government spending as a result of the additional alcohol tax revenues.³²</p>
International trade disputes	Taxes violate international trade law and may lead to expensive legal battles	Governments have a legally recognized right to protect the health of their populations. To avoid such claims, it is important that alcohol taxes are designed to be non-discriminatory (e.g. apply equally to imported and locally manufactured drinks). ⁸⁴

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