

Mr Robert Madelin
Director General
Health and Consumer Protection DG
European Commission
B-1049 Bruxelles

7 November 2008

Re: EuroCommerce and HOTREC concerns regarding consumer education in the European Alcohol and Health Forum and the EU Platform on Nutrition

Dear Mr Madelin,

On the occasion of the first plenary meeting of the European Alcohol and Health Forum, several organisations suggested setting up a Task Force on Consumer Education, where representatives of Member States and public authorities at various levels would discuss and develop strategies to educate and sensitise citizens on the issue of alcohol misuse.

Education is key in influencing perceptions, needs, demands and therefore the choice of consumers. Experience shows that what a person drinks or eats (whatever the age) does not only depend on price or availability, but also greatly on education. For instance, two youths living in the same environment, subjected to the same availability of alcohol (or sweet/salty/fatty foods) will not necessarily adopt the same attitude towards alcohol (or food consumption).

It is our firm conviction that the main responsibility for education lies with families, public authorities and private bodies at all levels (public or private schools, sport clubs, associations, religious associations etc.) and not with the industry.

Furthermore, in a demand driven economy, addressing consumer demand by curbing supply is inappropriate. Labelling is also a limited tool as logos or labels only bring added value if consumers have been sensitised to the issue.

Therefore, we consider that dealing with the wider aspects of consumer education in the Marketing Communication Task Force is inappropriate, as the objective of marketing is not to "educate" consumers, and could lead to such a misguided conclusion.

The role of businesses is to provide consumers with goods and services that meet their expectations and satisfy their needs. Marketing is a strategic activity enabling companies to identify consumer requirements and sell their products/services in a competitive market in accordance with the regulations governing it.

EuroCommerce and HOTREC both accept that industry has a role to play in providing information to consumers to enable them to make informed choices. Retailers and those within the hospitality industry already engage in this process and will continue to assume this role.

Limiting the display of alcoholic drinks to specified areas in shops, preventing sales in both shops and bars to the under-aged and similar measures will remain largely ineffective, if not accompanied by proper educational schemes by those responsible for the delivery of educational programmes.

The industry can commit itself to abide by ethical principles in its marketing and in raising consumer awareness, but it is not its role to "educate".

We therefore reiterate the request made at the first plenary meeting and in subsequent letters from EuroCommerce to the Commission. We suggest that the Commission invites public and private bodies in charge of education to both the Alcohol Forum and the EU Platform on Nutrition to share good practice and guidance. A dedicated working group on education with the participation of such stakeholders would be most relevant and could bring greater added value to the work of the Forum and the Platform. We believe that this would provide a more constructive and effective mechanism to address the issue of consumer education, rather than attempting to handle the question under the auspices of the Marketing and Communication Task Force.

Addressing alcohol abuse and improper eating habits is a shared responsibility, which implies the commitment of all stakeholders, including the public and private bodies in charge of education. Placing the burden on one stakeholder will not help to solve the situation.

We hope that our comments will be given due consideration for a successful outcome of discussions in the Forum and the Platform and for the benefit of society as a whole.

Yours sincerely,



Xavier Durieu
Secretary General of EuroCommerce



Marguerite Sequaris
CEO of HOTREC