

Web-based consultation on the action plan (2022 - 2030) to effectively implement the Global strategy to reduce the harmful use of alcohol

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While discussing about public policymaking, it would be a vital mistake to approach every state in the world coequally in terms of alcohol consumption and its regulations. Not all the states are reporting similar amounts of yearly pure alcohol consumption per capita, and in fact, the worldwide difference is rather severe. This paper will respond to WHO's latest Global alcohol action plan 2022-2030 from the perspective of one of the countries which is significantly under the bar, Turkey. We aim to visualize why it would be a crucial mistake to mandate such restrictive policies to a country like Turkey, which has evidently low amounts of alcohol consumption compared to Western countries.

Moderation is what is reasonable while lawmaking. The solution must compensate for the problem without any overflowing. Otherwise, the problem will not be satisfyingly solved; moreover, it would be increased by the backlash of the so-called solution. Unfortunately, about public policies towards alcohol consumption, the Turkish legislation has largely neglected this fundamental reason behind the problem-solving. The issue has become nothing but a growing headache throughout the years. Let us therefore see the numbers related to Turkey's alcohol consumption and compare them to its regulations in order to decide whether the regulations were necessary and should be a part of a global action plan against alcohol consumption, as WHO proposed.

According to *World Bank*, Turkey's total alcohol consumption per capita is 2.05, and it has been gradually decreasing since 2010ⁱ. The same statistic for France is 12.3, for Germany, it is 12.9, for the United Kingdom, it is 11.4, and for the United States, it is 9.9ⁱⁱ. We need to compare these countries to illustrate the significant difference throughout the cultures and economies. Turkey does not need to mandate the same regulations as those countries with higher proportions of consumption. In other words, it would be a crucial mistake to mandate Turkey the same regulations that aim to decrease alcohol consumption as other countries. In 2016, pure-alcohol consumption

per capita of Turkey was recorded by WHO as 1.3, while the arithmetic mean was 9.8 for the European Regionⁱⁱⁱ. Therefore, we oppose unrealistic goals suggested by WHO to reduce alcohol consumption 20%. The way used to achieve this goal can only burden those who consume alcohol in countries like Turkey with undue and unnecessary restrictions. There to say, Turkey does not have any problems with alcohol-related issues. Yet, it has legislated various codes throughout the years, which are to discuss below. The alleged problem of alcohol consumption is much smaller in Turkey, while the so-called solutions are nothing but the problem.

The means to achieve this goal of reducing alcohol consumption is rather significant. With unbearably high tax rates and undue restrictions, Turkey mirrors a utopia that WHO would want to see. We encounter that one of the ways which WHO is eager to mandate is advertisement bans and high taxes. Also, there might be any relevant suggestions, such as time limits, location limits, and so on. Turkey is a country that is currently enforcing such laws, disregarding its significantly low consumption rates. Nevertheless, with all these regulations, Turkey's challenge with alcoholic beverages may not be what WHO intends to achieve.

Article VII of Law no. 4760 regulates that the Special Consumption Tax (SCT) rates of alcoholic beverages shall be raised every six months^{iv} of a year. That means, Turkey is gradually raising the amount of SCT collecting from alcohol beverages every six months, disregarding any information about inflation or else. These consecutive raises evidently impose an unbearably heavy burden on Turkish citizens. Consequently, Turkish people become no longer able to buy safe products to drink easily. And the rise of the black market is inevitable, because accessibility approaches to zero, day by day. An article by Independent Turkish says that the price of Turkish raki has been raised 1212% in 17 years^v. The same article reports that wine prices also increased in the same period by 251%, and beer by 1030%. Accordingly, taxation specialist Ozan Bingol claimed on his Twitter account that the SCT to price ratio of a bottle of beer had recently become 130%^{vi}. The price of a bottle of beer is 6.30 TL, while total taxes are 8.19 TL. Turkish citizens can buy this bottle of beer for 14.50 TL, while the Government is earning more money than the retailer and the producer. One can easily understand that this burden may not possibly explained as it is for the good of the citizens. Consequently, while people are becoming unable to buy their favorite beer from a market,

they are approaching illicit sources. Nowadays, the black market for illegal alcoholic beverages has grown more than ever in Turkey because of the high taxes and low accessibility. Turkish Public Alcohol Policy Watch is a newly established platform of Freedom Research Association and the platform monitors Turkey's difficult challenge with the illicit market of alcoholic beverages and its inevitable consequences. Unfortunately, the numbers are disappointing and illustrate why the regulations in Turkey become the problem itself. The organization is mainly monitoring in 3-months periods; data such as the bootleg captured by law-enforcement officials, how many operations have been held, and how many people have lost their lives because of bootleg in 3 months. In the latest research, Turkish Public Alcohol Policy Watch has uncovered that 198.924 liters of bootleg have been captured^{vii}. Considering the low proportion of per capita alcohol consumption, this number of nearly 200.000 liters is visualizing how significant the problem is. Furthermore, the same report illustrates that 12 people have lost their lives in a week because of bootleg consumption. There is nothing acceptable about this statistic, and authorities must approach this issue with this state of mind. Seemingly, strict regulations despite low consumption rates are the usual suspect of this significant problem. As said before, Turkey has statistically no problem with excessive alcohol consumption, but now, as the report suggests, Turkey has an illicit market and bootleg issue. What is essential to understand is that so-called regulations become nothing but a problem.

We can consider, of course, some additional regulations that WHO suggested, which Turkey has legislated before. An example would be the advertisement ban that becomes law by Title VI of Law no. 4250. This title has been re-arranged, and the advertisement ban has been added in 2013 by the ruling party Justice and Development Party (AKP), which has been a law since then. According to World Bank, Turkey's total alcohol consumption per capita has only been decreased since, yet this decrease is not as significant as expected^{viii}. In fact, it only helped reduce the alcohol consumption of Turkish citizens, nearly to the null. Therefore, we are discussing a decrease from 2.12 (2015) to 2.05 (2018). In 2013, there have also been additional regulations, again by the lead of the ruling party. By Article VIII of the Regulation for the Sales and Offers of Alcoholic Beverages and Tobacco Products, it has become illegal to sell alcoholic beverages after 10 PM. The same statistic is also applicable to this statute. These regulations

have become nothing but intervening in the lifestyle of those who consume alcohol regularly and did not help Turkey to become healthier at all. Hence, people intend to think that there must be another motif since public health is not seemingly enhancing. Perhaps, the initial motif might be the imposition of a certain lifestyle and denouncing another. One can only speculate about it without further investigation. In the case of Turkey, however, it is not a secret that the ruling party is not very fond of alcohol-drinking lifestyles. This might be the case for some other states as well. That is why the opposing arguments towards restrictive regulations on alcoholic beverages are not only originated by those who consume it. In fact, no matter whether they drink it or not, people generally raise their voices because the target may change one day, and their lifestyle might be under threat.

With these restrictive regulations, the Government has pushed those who want to crack open a cold one after a long day of work to a somewhat limited field. Nonetheless, alcohol consumers are useful to the Government by indirectly paying enormous amounts of tax revenue. A newspaper article reports that in 2020, 96 billion TL (\$11.5 Billion) has been collected from alcoholic beverages and tobacco products by Turkish authorities^{ix}. It seems that while trying to reduce an already low consumption rate, Turkey has made enormous amounts of tax revenue from those who like to consume alcoholic beverages.

Consequently, these statistics are what the reality is, from the perspective of a Turkish, alcohol-consuming citizen. It must be asked, however, why WHO insists so much on the regulations that are proved to be failed many times. What must be done, is in fact, questioning and opposing the government interventions to free exercises. Whether they regularly consume alcohol or not, what bothers most Turkish citizens is the strictness of the regulations, compared to the lower statistics of per capita consumption. It is visible that the negligence of these facts is creating more significant mistakes in the end. We suggest that lawmaking in alcohol consumption must consider the statistical facts about excessive consumption. Otherwise, those regulations become nothing but an evident act of unjustified lifestyle interventions.

ⁱ data.worldbank.org/indicator/SH.ALC.PCAP.LI?locations=TR&name_desc=true

ⁱⁱ data.worldbank.org/indicator/SH.ALC.PCAP.LI?locations=TR&name_desc=true

iii www.who.int/publications/profiles/tur

iv Law of Special Consumption Tax in Turkey (Law no. 4760)

v <https://www.indyturk.com/node/296931/ekonomi%CC%87/17-y%C4%B1da-rak%C4%B1-y%C3%BCzde-1200-zamland%C4%B1-vergi-artt%C4%B1k%C3%A7a-kay%C4%B1td%C4%B1%C5%9F%C4%B1-art%C4%B1yor-%C3%A7ift%C3%A7i>

vi <https://twitter.com/ozanbingoll/status/1425380932052213767>

vii <https://oad.org.tr/blog/devletin-alkol-politikalarini-izleme-platformu-2021-yili-nisan-haziran-verileri/>

viii

<https://data.worldbank.org/indicator/SH.ALC.PCAP.LI?end=2018&locations=TR&start=2010>

ix <https://www.haberturk.com/alkolden-alinan-vergi-ne-kadar-haberler-2833427-ekonomi>