

Policy Measures to Reduce **Per Capita** Consumption of **Alcohol** in **India**



2022-2023



01

PER CAPITA

consumption of alcoholic beverages in India more than doubled from **2.4 litres** of pure alcohol in 2005 to **5.7 litres** in 2016.



02

IN 2016, INDIA

had the highest global per capita consumption of pure alcohol from spirits at **13.5 litres** in comparison to the global average of **4.3 litres** from spirits.



03

DRINKING PATTERNS

indicate that people drink to **'get intoxicated'** and engage in **'excess drinking'** and **'binge drinking'**



04

INDIA CONSUMED

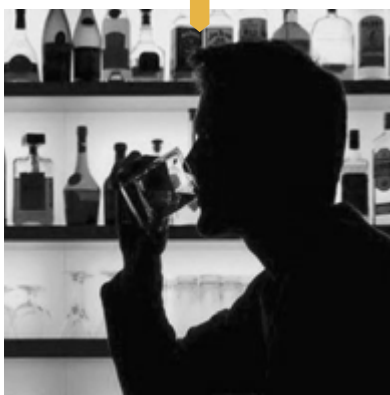
more than **663 million** liters of alcohol, making it the world's ninth-largest consumer of all alcohol by volume.



05

HIGH CONSUMPTION

is due to easy access of high alcoholic beverages, increasing affordability and lack of awareness on alcohol content across beverage.



06

AFTER CHINA, INDIA

is the second largest consumer of spirits (Whiskey, vodka, gin, rum, IMFLs, country liquor etc.)



FOREWORD



ASHIM SANYAL

CONSUMER VOICE

Irresponsible consumption of alcohol is a major concern in India, as people drink to get intoxicated and engage in excessive and binge drinking. Heavy drinkers generally consume high alcoholic beverages instead of low alcoholic beverages.

India consumed more than 663 million litres of alcohol, making it the world's ninth-largest consumer of all alcohol by volume. After China, we are the second largest consumer of hard liquor.

With alcohol consumption in India seeing its highest growth in the 15-30 age groups, we are concerned about excess per capita consumption of alcohol and its consequences. In today's day and age, it is imperative to have policies to moderate consumption and promote responsible drinking.

India does not have a central level policy to reduce consumption and is among the few countries which does not have guidelines on safe consumption. There is vague guidance rather than specific count, which leaves a lot of room for assumption for both consumers and health professionals. While the measurements are not recommendations for how much one should drink, it gives a common reference for people to measure and moderate their intake.

State governments see the alcoholic beverage industry as a cash cow and the mandate of alcohol control is currently handled by the State Excise Departments. Alcohol coming under the excise department is one of the biggest flaws in the system, as it is a known fact that the primary goal of excise departments is to increase revenues and not promote responsible drinking.

Hence, there is an urgent need for the government to recognize this issue and take steps to moderate alcohol consumption. Through this report, we point the need for moderation, both through policy measures and creating consumer awareness for regulating intake at individual levels.

FOREWORD



TUSHAR GANDHI

GATEWAY CONSULTING

Through this report, we bring your attention to the increasing per capita consumption of pure alcohol in India due to factors such as improvement in standards of living, higher disposable incomes, high stress levels and the myth of alcohol being a stress buster.

We have highlighted the lack of awareness amongst consumers, especially young adults, on the actual amount of alcohol content across various beverages and lack of a common reference point to moderate intake.

The report brings to light that hard liquor is more cheaply available across states. This makes beverages with high alcohol content most affordable than beverages with low alcohol content. Hence, it is important to first understand Alcohol by Volume (ABV), which is the amount of pure alcohol content across beverages, to stay in control of one's drinking.

Recommendations in the report include policy measures aimed at disincentivizing consumption of high alcoholic beverages and creating consumer awareness to regulate intake on an individual level. The six recommendations include 1) Alignment with WHO's action plan to reduce harmful use of alcohol; 2) Creating awareness on pure alcohol content across beverages; 3) Consulting state health departments while formulating excise policies; 4) Duties to be levied based on Alcohol by Volume (ABV) content; 5) Setting up of a minimum unit price for alcohol; 6) Ban on sale of ultra-small packs of alcohol.

We urge that the government look at broader social aspects that include higher healthcare and social care costs while making alcohol policies. The report aims to trigger a debate and engage stakeholders with an objective to reduce per capita consumption of alcohol.

ACRONYMS

ABV	Alcohol By Volume
AUD	Alcohol Use Disorder
BAC	Blood Alcohol Content
CAGR	Compound Annual Growth Rate
CL	Country Liquor
HED	Heavy Episodic Drinking
ICD	International Classification of Disease
IMFL	Indian Manufactured Foreign Liquor
IML	Indian Manufactured Liquor
IWSR	International Wine and Spirit Research
MoHFW	Ministry of Health and Family Welfare
MC's	Million Cases
MRP	Maximum Retail Price
MUP	Minimum Unit Price
NFHS	National Family Health Survey
NCD	Non-Communicable Diseases
QoL	Quality of Life
WHA	World Health Assembly
WHO	World Health Organization
FSSAI	Food Safety and Standards Authority of India

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EXECUTIVE SUMMARY

Alcohol consumption has been growing in India and globally, and the culture of drinking is deeply embedded in our social fabric. Alcohol is an intoxicating substance which should be consumed responsibly and in moderation. Its irresponsible use has potential to create short term issues such as poisoning, injuries, suicides, violence and crime; and long-term issues like addiction, cirrhosis, cancer, cardiovascular diseases, mental health disorders, liver and digestive diseases.

India is one of the fastest growing alcoholic beverages markets globally. With an estimated market size of USD 52.5 billion in 2020 and the market is expected to grow at a CAGR of 6.8 percent between 2020 and 2023. Over 600 million people in India are over the legal drinking age. Between 2005 and 2016, while the average per capita consumption levels dropped across majority countries including in the EU, such as Spain, Netherlands, Italy and Sweden, per capita consumption in India almost doubled from 2.4 litres to 5.7 litres of pure alcohol during the same period.

Factors such as changing demographics, improvement in standards of living, higher disposable incomes, change in spending patterns, a growing culture of social drinking, and the myth of alcohol being a stress buster has driven this growth. The number of people too consuming alcohol increased from 219 million in 2005 to 293 million in 2018, and is projected to increase to 386 million by 2030. The share of the upper middle-income group in alcohol consumption has increased steadily from 7 percent to 21 percent during this period and is expected to increase to 44 percent by 2030.

Objective of this report is to bring your attention to the increasing per capita consumption of pure alcohol. In India, drinking patterns indicate that people drink to **'get intoxicated'** and engage in **excess drinking** and **binge drinking**. Heavy drinkers generally consume high alcoholic beverages instead of low alcoholic beverages. Hard liquor such as whiskey, vodka, rum, gin, IMFLs and country liquor (desi sharab) which have high alcohol by volume (ABV) content, were most preferred in comparison to consumption of low alcoholic beverages like beer and wines.

As per an Indian Council for Research on International Economic Relations (ICRIER) and PLR report, in 2016, **average per capita consumption of spirits in India was the highest in the world at 13.5 litres of pure alcohol in comparison to just 1.1 litres of pure alcohol from beer**. In contrast, global average per capita consumption of pure alcohol from beer was around 6 litres, followed by spirits (4.3 litres), wine (2.3 litres) and others (1.8 litres).

Average per capita consumption of pure alcohol in India



Pure alcohol is the actual alcohol content, which varies across beverages.

The two main reasons for increasing per capita consumption of pure alcohol are easy access to alcoholic beverages which have high alcohol by volume (ABV) content, and lack of information and common reference point to regulate intake at an individual level.

Currently, duties levied by most states is the same for all alcoholic beverages, regardless of the actual alcohol content. **Numbers indicate that beverages with high alcohol content attract the lowest duties.** For instance, hard liquor such as IMFL attracts one of the lowest duty rates. Even between mild and strong beers, with alcohol content of 5 and 8 percent respectively, strong beers attract significantly lesser duties per ml of alcohol by volume (ABV) content as compared to mild beers.

On the other hand, there is a lack of awareness amongst consumers on the actual amount of alcohol content across various types of beverages, measurement of intake and moderation. A report by National Institute of Mental Health and Neuro Sciences (NIMHANS) acknowledges that there is lack of awareness on safe consumption fueled by confusing messages regarding alcohol use by health professionals and media. As a general guide it is recommended sticking to **no more than six to seven standard drinks per week and not more than 4 drinks per day for men and about half that for women**, for a healthy adult. It also recommended that one needs to stay under both daily and weekly limits.

India is among the few countries which does not have any guidelines on safe consumption of alcohol and does not quantify permissible limits of consumption. There is vague guidance rather than specific count, which leaves a lot of room for assumption for both consumers and health professionals. While the measurements are not recommendations for how much one should drink, it gives a common reference for people to measure and moderate their intake.



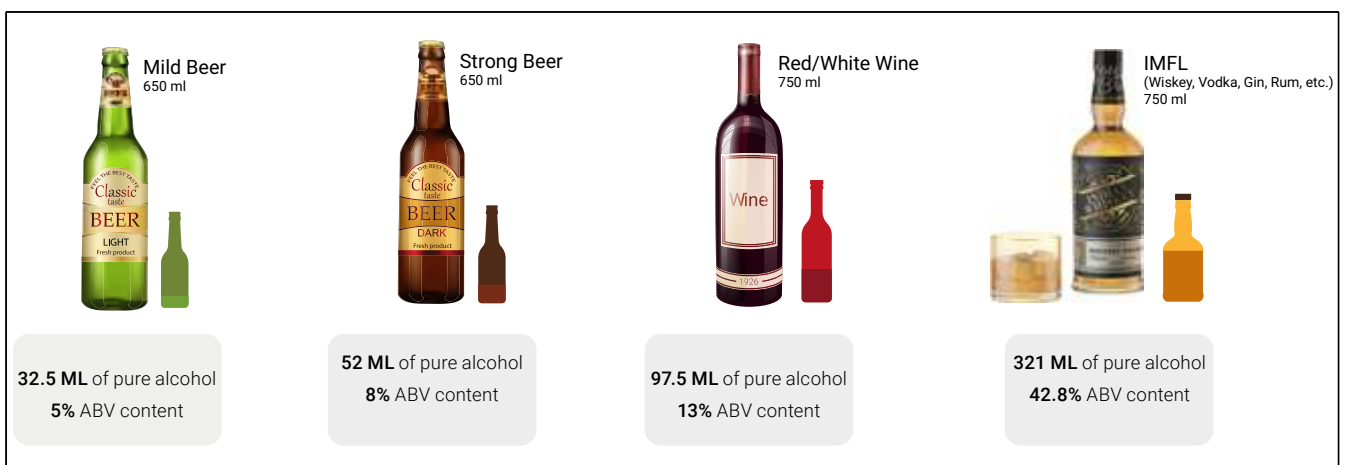
Dr Pankaj Chaturvedi,

Deputy Director at the Centre for Cancer Epidemiology, Dr Pankaj Chaturvedi acknowledged a report by the Parliamentary Standing Committee on Health and Family Welfare, which recognized the perils of alcohol consumption, and recommended a policy to discourage its use.

As per him, despite being the second preventable cause of ever-rising non-communicable diseases, including cancer, India lacks a policy to reduce alcohol usage.² Dr Chaturvedi also wrote to the Ministry of Health and Family Welfare to bringing out an alcohol related policy and stressed the need for moderating consumption, instead of prohibition.

Dr Chaturvedi is a noted oncologist who has been named among the top two percent best scientists in the world based on productivity through publications and citations. He has tremendous interest in public health issues especially related to tobacco, areca nut and alcohol control.

So, it is important to first understand Alcohol by Volume (ABV), a globally adopted standard, to stay in control of one's drinking. ABV is the measure of the percentage of milliliters of alcohol or pure ethanol in an alcoholic beverage. This ranges from less than 3.5 percent in super mild beer, 3.5 – 5.0 percent in mild beers, 5.0 to 8.0 percent in strong beers, 12.0 to 15.0 percent in red and white wines and 38.0 to 42.8 percent in hard liquor (whiskey, rum, gin, brandy, IMFLs and country liquor).



As per a National Institute of Mental Health and Neurosciences (NIMAHNS)³ study, an average of five 'standard drinks' consumed on each drinking occasion technically qualifies for a 'heavy drinking situation'. Hence, it is important to first know the amount of pure alcohol content (also referred to as ethanol), across different types of alcoholic beverages. Lack of awareness about the alcoholic content in a beverage has led to behaviours of harmful and binge drinking.

The recommendations in the report are given with an aim to reduce the per capita consumption of alcohol and contribute to reducing health and social problems due to excessive consumption. These include a combination of initiatives to create consumer awareness on intake and a set of policy measures aimed at disincentivizing consumption of high alcoholic beverages.

³ Established in 1925, NIMHANS is the apex center for Mental Health and Neuro Science education in the Country and operates autonomously under the Ministry of Health and Family Welfare.

RECOMMENDATIONS TO REDUCE PER CAPITA CONSUMPTION OF ALCOHOL

1

Alignment with WHO's Action Plan

India should commit to WHO's Global Alcohol Action Plan 2022-30¹ which has set a target to reduce the harmful use of alcohol by at least 20 percent by 2030. Recommendations include six key areas for global action for member states, WHO secretariat, international partners, civil society organizations and academia.

Creating Awareness on Pure Alcohol Content Across Beverage Types

India is amongst the few countries which does not have any guidelines on safe alcohol consumption. Information available is varied, inconsistent and difficult to understand by the public. General lack of awareness on alcoholic content across beverages and intake has resulted in behaviour of harmful and binge drinking. We recommend that the Government issue general guidelines on alcohol intake, safe consumption and create awareness around pure alcohol content across beverage types like beer, wine and hard liquor.

2

3

Health Departments to be Consulted While Making Excise Policies

Rather than looking at the alcohol sector as a source of revenue generation, the government needs to direct its duty structure to consider broader health and social aspects. We recommend that health departments are made part of state consultation processes while formulating state excise policies. Such a step is likely to go a long way to ensure moderation and reducing per capita consumption instead of taking the extreme steps like prohibition.

Levy Duties Based on Alcohol by Volume (ABV) Content

Hard liquor like whiskey, vodka, rum, gin, IMFLs and country liquor were the most preferred beverages. India had the highest per capita consumption of hard liquor in the world at 13.5 litres of pure alcohol, in comparison to just 1.1 litres from beer. To reduce per capita consumption, duties need to be in line with actual alcohol by volume (ABV) content – which is higher duties for high ABV content. This will ensure that heavy drinkers pay for costs relative to their consumption and consider a shift to low alcoholic beverages.

4

5

Set Minimum Unit Price (MUP)

Price control measures are shown to reduce heavy drinking. Raising the price of the cheapest forms of alcohol by setting a minimum unit price will have a significant impact on risky drinking. MUP sets a minimum base price depending on the amount of actual alcohol content (gms/ml). We recommend that the government mandate a minimum price for the cheapest forms of alcohol as this will go a long way in reducing per capita consumption.

Ban on Sale of Ultra Small Packs

Sale of ultra-small packs or miniatures of liquor increases its affordability and availability. This is against the government's objective of reducing consumption. Compared with cigarettes, states like Delhi, Maharashtra, Karnataka and Chhattisgarh banned loose sale of cigarettes and bidis to reduce consumption. Similarly, we recommend a complete ban on sale of ultra-small packs of alcohol (tetra, plastic or glass bottles) below a certain quantity for e.g. below 180 ml.

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In addition to these recommendations, we urge the government that, rather than looking at the alcohol sector from the point of revenue generation, it should direct its duty structure to take into consideration the broader social aspects that include higher healthcare and social care costs, crime, loss of life, accidents, and loss of employment which are directly linked to high per capita intake of alcohol.

While implementing these recommendations will be the responsibility of the states, its progress may be monitored at the central level by the Ministry of Health and Family Welfare. We hope that these recommendations trigger a debate and engage stakeholders into further discussions and explore potential outcomes.

1. BACKGROUND

Alcohol consumption has been increasing over the years. As per a recent WHO report, an estimated 2.3 billion people drink alcoholic beverages worldwide and the culture of drinking is deeply embedded in the social fabric of societies globally and in India.

Since alcohol is an intoxicating substance, it is recommended that it is consumed in moderation at an individual level. People often do not recognize that high quantities of alcohol consumption in a single sitting can cause damage to their health and expose them to risky behaviour. This may be a result of having little to no understanding of the quantity of pure alcohol present in different types of beverages, levels of consumption where harms are minimized, concept of a standard drink, and general drinking guidelines on the quantity per day or week.

1.1 HAZARDOUS AND HARMFUL DRINKING

Alcohol consumption is increasingly being embedded in the Indian culture and has led to patterns of harmful drinking. As per a World Health Survey, heavy and hazardous drinking was defined as average consumption of 40 grams or more of pure alcohol per day for men and 20 grams or more per day for women.

Heavy Episodic Drinking (HED): The rate of heavy episodic drinking, defined as consumption of five standard drinks in one sitting. In another report by International Alliance for Responsible Drinking (IARD), WHO defines Heavy Episodic Drinking as the proportion of adults of 15 years and above, who have had at least 60 grams or more of pure alcohol on at least one occasion in the past 30 days. Citing WHO data, the report highlighted the change in Heavy Episodic Drinking (HED) from 2010 to 2016 among total population aged 15 and older. **The report showed that HED declined in a total of 164 countries;** remained unchanged in nine countries; and, increased in a total 16 countries, some of them concentrated in Southeast Asia. **India was amongst the few countries across the world where Heavy Episodic Drinking had increased. Other countries include Myanmar, Laos, Vietnam, Nigeria, North Macedonia (Europe), Latvia, Iceland and Uruguay (South America).**

As per 2011 NIMAHNS study, Alcohol Related Harm – Implications for Public Health and Policy in India, an average of five standard drinks consumed on each drinking occasion technically qualifies for a 'heavy drinking situation'. The frequency of use varies between men and women, with men drinking more frequently than women and also consuming larger quantities.



Change between 2010 and 2016 in prevalence of age-standardized heavy episodic drinking among the total population aged 15 and older

While almost 70 percent of men drank daily or almost daily, 55 percent of the women consumers also drank regularly (Benegal et al, 2005) and this user frequency can hardly be termed 'infrequent' drinking.

Binge Drinking: In India, drinking patterns indicate that people drink to '**get intoxicated**', rather than use it for socializing or recreation. Heavy intake of alcohol within a brief period of time, with an intention to get intoxicated, is called binge drinking. It refers to the consumption of five or more alcoholic drinks in a period of about 2 hours, in a single occasion for men and four or more drinks for women.⁴ A report by Hazarika et al (2000) noticed that about a third of all drinkers reported drinking almost every day for six or more days a week and over half for four or more days a week. Country liquor and IMFL were the preferred drinks. Those consuming country liquor drank almost every day compared with those drinking low alcohol by volume (ABV) beverages.

As per a more recent 2019 report by the National Drug Dependence Treatment Centre and All India Institute of Medical Sciences, country liquor (desi sharab) and IMFLs, which had high alcohol by volume (ABV) content, were the most preferred beverages in India. To corroborate, as per a report by Pahle India Foundation, as of 2017, the total market share of country liquor was 48 percent, 36 percent for IMFL, 13 percent for beer and 3 percent for imported liquor. **One of the primary reasons for high consumption of beverages with high alcohol content is that they are more affordable as compared to low alcohol content beverages like beer and wine.**

Increase in per capita consumption of alcohol in India is due to many factors such as 'drinking to intoxication' seen as normal especially amongst young adults; celebrations and alcohol becoming a custom; widespread availability and accessibility of cheap and high ABV alcohol products; and, surrogate advertising in mainstream media and direct promotions on social media.

1.2 GLOBAL STRATEGY TO REDUCE HARMFUL USE OF ALCOHOL

WHO's Global Action Plan

The WHO Global Strategy to reduce the harmful use of alcohol seeks to improve the health and social outcomes for individuals, families and communities, with considerably reduced morbidity and mortality due to harmful use of alcohol and their ensuing social consequences. Endorsed by the Sixty-third World Health Assembly in May 2010, the strategy continues to be the only global policy framework for reducing deaths and disabilities – from mental health conditions, noncommunicable diseases to injuries and alcohol attributable infectious diseases. It was developed to promote and support local, regional and global actions to prevent and reduce the harmful use of alcohol.

It outlines key components for global action and recommends various policy options and measures for implementation at the national levels. The action plan enables member states and other stakeholders to identify and use opportunities for synergies to tackle several risk factors and strengthen coordination to reduce harmful use of alcohol and set voluntary targets for reducing harmful use of alcohol.

United Nations Sustainable Development Goals 2030⁵

The international mandate to reduce the harmful use of alcohol by the UN was further strengthened with the adoption of the agenda of Sustainable Development Goals 2030 (SDG 2030). As per SDG 3, effective reduction of the harmful use of alcohol will make a substantial contribution to the achievement of good health and well-being worldwide. Furthermore, target 3.5 of SDG 3 includes the objective of strengthening the prevention and treatment of substance abuse, including harmful use of alcohol. This reflects the broader impact of harmful use of alcohol on health beyond NCDs and mental health (SDG target 3.4) – in areas such as road traffic accidents (SDG 3.6), reproductive health (SDG 3.7), universal health coverage (3.8) and infectious diseases (SDG 3.3).

Reducing the harmful use of alcohol will contribute to progress achieved with the attainment of multiple goals and targets of the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs). This includes goals on ending poverty (SDG 1), quality education (SDG 4), gender equality (SDG 5), decent work and economic growth (SDG 8), reducing inequalities between and within countries (SDG 10), as well as peace, justice and strong institutions (SDG 16).

2. INDIAN SCENARIO

India is one of the fastest growing alcoholic beverages markets globally, with an estimated market size of USD 52.5 billion in 2020 and the market is expected to grow at a CAGR of 6.8 percent between 2020 and 2023. Over 600 million people in India are over the legal drinking age.

2.1 HIGH PER CAPITA ALCOHOL CONSUMPTION IN INDIA

A World Health Organization (WHO) report in 2018 showed that, from 2005 to 2016 the **per capita consumption** of alcoholic beverages in India increased from 2.4 litres to 5.7 litres. After China, India is the second largest consumer of hard liquor (whiskey, vodka, gin, rum, IMFLs, country liquor). The main reasons for high levels of per capita consumption is easy access to beverages with high alcoholic content; increasing affordability, lack of information about alcohol content across beverage types; and, absence of a common reference point to regulate intake.

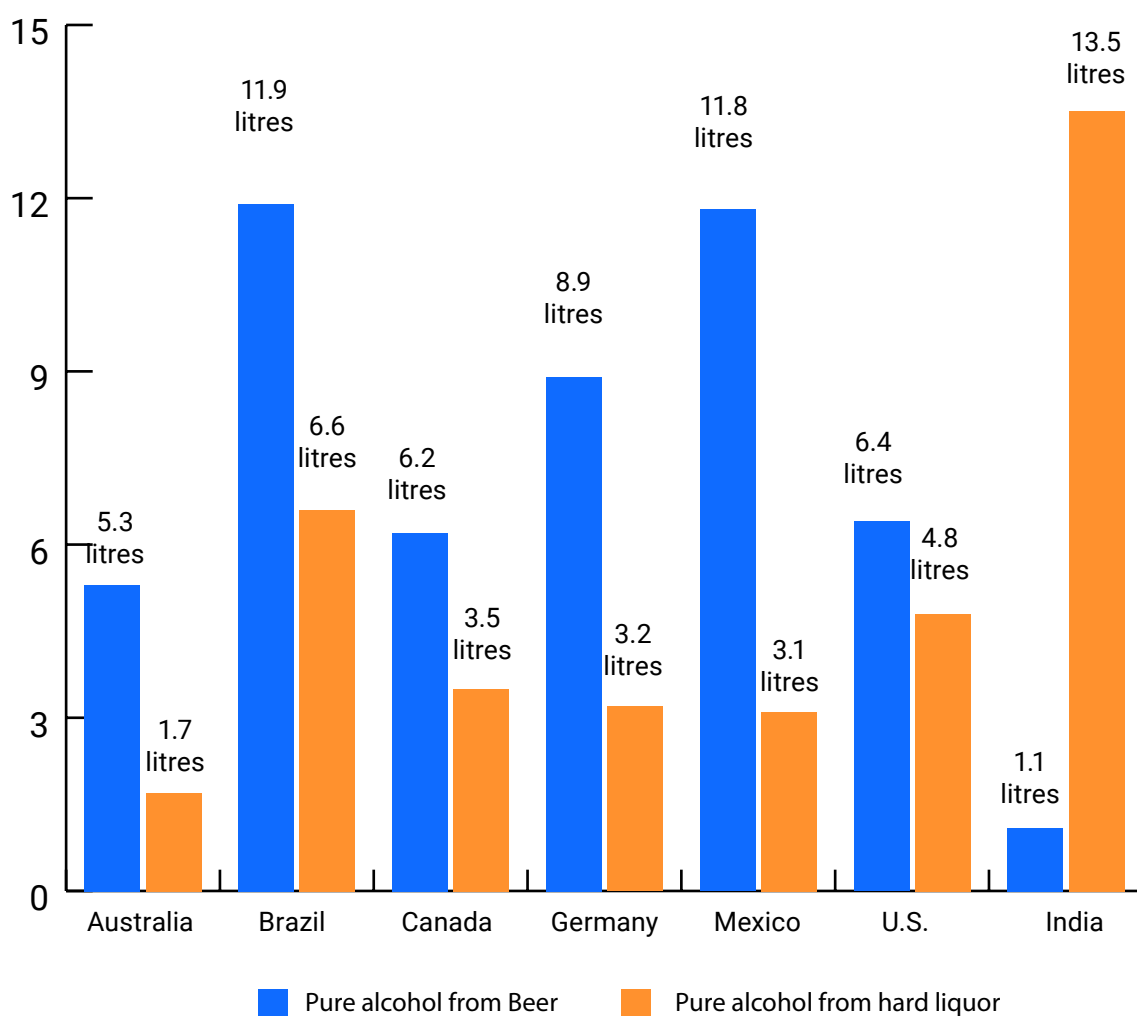
⁵ The Sustainable Development Goals (SDGs), also known as the Global Goals, were adopted by the United Nations in 2015 as a universal call to action to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity.

2.2 HARD LIQUOR CONSUMPTION IN INDIA HIGHEST IN THE WORLD

Alcohol product categories include high alcoholic beverages or hard liquor such as whiskey, vodka, rum, gin, IMFLs and country liquor; and Low alcoholic beverages like beer and wines.

Among these segments of alcoholic beverages, in 2016, **average per capita consumption of hard liquor in India was the highest in the world at 13.5 litres of pure alcohol in comparison to just 1.1 litres of pure alcohol from beer.** In contrast, global average per capita consumption of beer was around 6 litres of pure alcohol in a year, followed by hard liquor (4.3 litres), wine (2.3 litres) and others (1.8 litres).

In most other countries, beer consumption was far higher than hard liquor. For instance, in Australia it was at 5.3 litres vs 1.7 litres; in Brazil it was 11.9 and 6.6 litres; in Canada it was 6.2 and 3.5 litres; in Germany it was 8.9 and 3.2 litres; in Mexico it was 11.8 and 3.1 litres; and, in the U.S. it was 6.4 and 4.8 litres.



Source: *Developing Principles for Regulation of Alcoholic Beverages Sector in India – ICRIER & PLR Report*

As per a WHO study, 'Burden and Social-Economic Impact of Alcohol', also known as 'The Bangalore Study', nearly three fourths who had been using alcohol for more than 5 years, were frequent users and consumed spirits with high alcoholic content.⁷ As per the report, Hazardous drinking measured in terms of 'binge drinking' and pathological drinking was reported by 40 percent and 25 percent respectively. Survey for the report which was conducted in households of rural, town, slum and urban populations in and around the city of Bengaluru found that, **'Hard' liquor like whiskey and arrack was the first choice for 80 percent of the population.**

Commenting on the consumption of beer in India, Benegal observes that even though it constitutes less than 5 percent of total alcohol consumption, 70 percent of beer sales are dominated by strong beers at strengths over 8 percent v/v (Benegal, 2005). This highlights that as a society, **we drink to get intoxicated** and choose high alcoholic beverages any day over low alcoholic beverages.

According to IWSR Drinks Market Analysis, a London-based research firm reported that India consumed more than 663 million litres of alcohol, making it the world's ninth-largest consumer of all alcohol by volume. After China, India is the second largest consumer of hard liquor (whiskey, vodka, gin, rum, IMFLs, country liquor etc.)

India is the highest consumer of whiskey in the world, about three times more than the U.S., which is the next biggest whiskey consumer. Nearly one in every two bottles of whiskey bought around the world is now sold in India. When worldwide booze consumption dipped in 2018, India partly drove a 7 percent uptick in the global whiskey market.⁸

While average per capita consumption levels dropped across majority countries including in the EU, such as Spain, Netherlands, Italy and Sweden between 2005 and 2016; per capita consumption in India almost doubled from 2.4 litres to 5.7 litres of pure alcohol during the same period.

2.3 EFFECT OF TAXATION ON CONSUMPTION

The alcoholic beverage sector contributes majorly to the economy through tax revenues. Since the implementation of Goods and Services Tax, excise is one of the major taxes directly charged by states, and forms a significant part of the states' revenue receipts. It was estimated that the total excise revenue generated by the alcoholic-beverages industry alone in 2018-19 was to the tune of INR 1.4 lakh crores, which is a 15 percent increase from the previous year's revised estimates.

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WHO study: Burden and Social-Economic Impact of Alcohol – The Bangalore Study
Alcohol consumption in India to touch 6.5 billion litres by 2020 | Ambrosia India
<https://indianexpress.com/article/cities/chandigarh/excise-policy-liquor-punjab-e-auction-vendors-alcohol-contractors-7985603/>

State governments see the alcoholic beverage industry as a cash cow. Responsibility of alcohol reduction is given to the excise departments. However, as their mandate is focused towards revenue generation, they do not look at alcohol from health and social aspects. Taxes from the sale of alcohol is a major revenue source and it is also a known fact that state governments look to increase it year on year. For instance, in June 2022, the State Government of Punjab tweaked its excise policy to encourage contractors to come forward to bid for liquor vends. With this, the state government expected to earn a revenue of Rs 9,500 crore this fiscal. An official also said that they would be satisfied even if they were able to make Rs 9,000 crore.

As per Dr. Pankaj Chaturvedi from the Centre for Cancer Epidemiology at the Tata Memorial Centre, alcohol coming under the excise department is one of the biggest flaws in the system. He said the department was focused more on revenue generation and the police had no jurisdiction in implementing alcohol control measures. He has written to state governments several times on the issue and has highlighted the danger posed by the unmonitored access that underage drinkers get to alcohol. He added that alcohol is the second biggest preventable cause of death and disease and we need a policy in place to moderate its intake.

2.3.1 Uniform Duty/ Taxation Structure

The quantum of duties levied by most states is the same across all types of alcoholic beverages, regardless of its alcohol by volume (ABV) content. When duty charged is calculated across beverage types like beer, hard liquor and wine, it becomes evident that low alcoholic beverages attract the highest duty per milliliter of alcohol. This brings to light an inconsistent approach to taxation.

When duty charged is calculated across beverage types like beer, hard liquor and wine, it becomes evident that low alcoholic beverages attract the highest duty per milliliter of alcohol.

The table below shows duty charged across the states of Karnataka, Maharashtra, Uttar Pradesh, Rajasthan and Haryana on per ml of beer, IMFL, and wine. **The numbers indicate that beverages with high alcohol content attract the lowest duties.** For instance, IMFL attracts one of the lowest duty rates. Even between mild and strong beers which contain 5 percent and 8 percent alcohol content respectively, there is stark variation with strong beers attracting significantly lesser duties per ml of alcohol by volume (ABV) content as compared to mild beers.

This results in the MRP (Maximum Retail Price) of a bottle of beer being at par or higher compared to a 180ml bottle of beverages with high alcohol content like IMFL. This anomaly steers consumers towards consumption of high alcoholic beverages to get higher levels of intoxication at the same or lower price.

Duty Per ml of Alcohol (Including Excise, Additional Excise and VAT)

State	IML	Super Mild Beer	Mild Beer	Strong Beer	Wine
Karnataka	0.54	-	3.02	1.89	0.10
Maharashtra	0.72	-	1.98	1.62	0.38
Uttar Pradesh	0.72	-	2.82	1.87	1.42
Rajasthan	0.53	-	2.65	1.91	2.94
Haryana	0.30	2.04	1.40	1.03	2.06

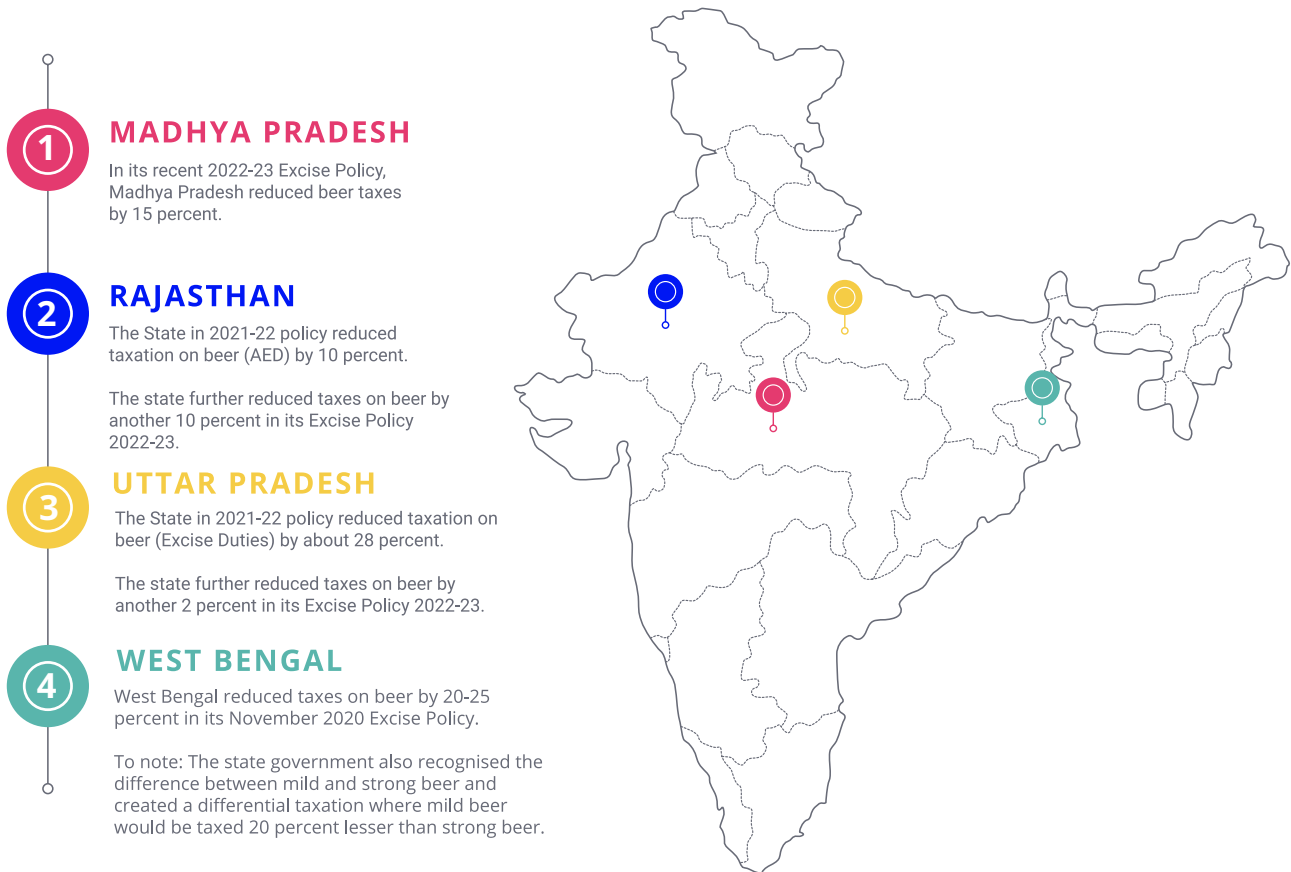
Based on 2021 and 2022 publicly available data.

This shows significant disparities with low alcoholic beverages facing higher duties per millilitre of alcohol content as against high alcoholic beverages. The existing duty structure seems to encourage both production and consumption of beverages with high alcohol by volume content.

Recently state governments like Haryana, Uttar Pradesh, West Bengal and Rajasthan brought down taxes on beer to reduce prices and moderate the intake of alcohol consumption. Haryana and West Bengal also introduced a new slab for beverages with up to 3.5 percent alcohol content (beer) at a reduced tax slab.

Currently, the taxes and excise duties imposed by most states across various types of beverages is arbitrary and there is no formula for imposing taxes. The table above shows that tax regulations that have been adopted are detrimental to maintaining the healthy consumption patterns amongst the people.

Realising the importance of having reduced tax slabs on low alcoholic beverages, states like Rajasthan, Uttar Pradesh, West Bengal and Madhya Pradesh reduced tax slabs on beer over the last two years in the range of 10 to 25 percent.



This is resulted in an increase in consumption of low alcoholic beverages which resulted in an increase in revenue collection and at the same time effected a shift in consumer behaviour to move towards beverages with low alcohol content.

Hence, it is important for the government to consider lower taxes on low alcoholic beverages and high taxes on high alcoholic beverages, so as to make a shift in consumption. Such a move is likely to automatically reduce per capita consumption of alcohol in India.

2.3.2 Hard Liquor Made Most Affordable

A comparison of the lowest cost of alcoholic beverages across a few states revealed that the base price of hard liquor containing high alcohol content was substantially lower than that of beverages with low alcoholic content. This increased affordability of beverages with high alcohol content and encouraged its consumption.

For instance, in Rajasthan, the lowest price of Indian whiskey (part of the IMFL range) with over 40 percent alcohol content was at Rs 105 for 180 ml, and prices of other spirits like rum, brandy, gin and vodka were around the range of Rs 105 to Rs 115. The price of domestically made liquor also called as Rajasthan Made Liquor (RML), was even lower at Rs 84 per 180 ml. Whereas, the lowest price of a 330 ml pint of mild beer with 5 percent alcohol content was Rs 75.

In Haryana, the lowest price of Indian whiskey was Rs 90 for 180 ml, and prices of other spirits were in the range of Rs 90 to 120. Whereas, the cheapest pint of 330 ml beer was available for Rs 80. In Telangana, Indian whiskey costed Rs 120 for 180 ml, and a pint of 330 ml of beer costed Rs 110. In Maharashtra, the cheapest Indian Whiskey was available for Rs 130 per 180 ml and a 330 ml of beer was available for Rs 75.

In Karnataka, Indian whiskey was available for as low as Rs 56 for 180 ml with other spirits costing around the same amount, whereas, beer was priced at Rs 50 for a 330 ml pint. The state also had availability of ultrasmall packs of 90 ml whiskey or brandy, which were available as cheaply as Rs 28. This also brings us to the point of high affordability of alcohol. Therefore, there is also a need for increasing minimum unit pricing, a point which we have covered in detail in the recommendation section.

We found some parity in the state of Uttar Pradesh, where the lowest price of whiskey was at Rs 180 for a 180 ml, and Rs 80 for a 330 ml pint of beer.

Objective of this table is to bring to light the availability of high alcoholic beverages at very low prices.

State	IML	Super Mild Beer	Mild Beer	Strong Beer
1.	Rajasthan	Rs 105 (IMFLs)	75	195 (180 ml)
		Rs 1.36 per ml	Rs 4.54 per ml	Rs 8.33 per ml
2.	Haryana	Rs 90	Rs 80	250 (375 ml)
		Rs 1.16 per ml	Rs 4.84 per ml	Rs 5.12 per ml
3.	Telangana	Rs 120	110	Rs 120 (180 ml)
		Rs 1.55 per ml	Rs 6.66	Rs 5.12 per ml
4.	Maharashtra	Rs 130	75	Rs 125 (375 ml)
		Rs 1.68 per ml	Rs 4.54 per ml	Rs 2.56 per ml
5.	Karnataka	Rs 56	Rs 50	Rs 40 (180 ml)
		Rs 0.72 per ml	Rs 3.03 per ml	Rs 1.7 per ml
6.	Uttar Pradesh	Rs 180	Rs 80	Rs 680 (750 ml)
		Rs 2.33 per ml	Rs 4.84 per ml	Rs 6.97 per ml

Based on 2021 and 2022 publicly available data.

2.4 GLOBAL TAXATION POLICIES

Price control measures through taxation are used by governments to reduce consumption and increase revenues. Here are some examples on the steps taken by a few countries for achieving their objective of reducing per capita consumption of alcohol.

- **Singapore:** Back in 2007, Singapore was the one country to have rationalised the alcohol duty system and progressively moved towards taxing liquors on the basis of alcohol content. In 2008, Singapore retained a simple excise duty system with just two rates – an excise duty rate for beer, cider and perry and an excise duty rate for wines and hard liquor. These were calculated according to the pure alcohol content of the beverage where it is lesser for beer and cider, than for wines and hard liquor.
- **Scotland:** In 2018, Scotland became the first country in the world to introduce Minimum Unit Pricing for alcohol, at 50 British pence per unit (8 g) sold.¹⁰ This means that a bottle of beer containing 2.5 units of alcohol cannot be sold under £1.25 and a bottle of wine with 10 units of alcohol cannot be sold under £5. Following this, in March 2020, Wales followed suit with the same MUP of 50 pence per unit of alcohol sold. Research from Newcastle University found that alcohol sales fell by almost 8 percent after the policy was introduced in Scotland. In Wales there was fall in sales by 8.6 percent, when compared with the west of England.¹¹ *A Canadian Research Study also suggested that minimum pricing policies may reduce total alcohol consumption and shift from high strength beverages.*
- **Ireland:** In 2018, Ireland introduced the Public Health (Alcohol) Act to tackle alcohol misuse and underage drinking. One of the measures was introduction of Minimum Unit Pricing (MUP), where the minimum price charged per gram of alcohol was 10 cents. Hence, a bottle of an alcoholic beverage was charged on the amount of actual alcohol content contained in that bottle of beverage.¹²
- **United Kingdom:** In 2010, UK proposed a ban on selling at prices below the production cost by stipulating that the price could not be lower than the tax payable on the product. This proposal was withdrawn and later again adopted in 2014. In 2014, to regulate the price of alcohol, the UK government proposed a minimum unit pricing policy.
- **Russia:** Russia introduced minimum price for vodka in 2010.

10 <https://www.bbc.com/news/uk-scotland-57293223>

11 [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(21\)00052-9/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(21)00052-9/fulltext)

12 <https://www.ibec.ie/drinksireland/alcohol-in-society/public-health-alcohol-act>

2.5 MEASUREMENT AND INTAKE

There are no **'Safe Levels'** of alcohol consumption. However, it is important for consumers to be aware on the actual amount of alcohol content across various types of beverages, measure intake and practice moderation. For instance, a person may get intoxicated consuming 180 ml of hard liquor (40 percent ABV) but not in 180 ml of beer (5-8 percent ABV). This is because hard liquor contains more alcohol by volume or ABV as against beer or wine. A report by National Institute of Mental Health and Neuro Sciences (NIMHANS) acknowledges that there is lack of awareness on safe consumption fueled by confusing messages regarding alcohol use by health professionals and media.

There is no clear formula to assess how much alcohol is safe. Each person's body is different and processes alcohol differently. There are other factors such as adequate and quality of sleep, food and water intake and how speed of alcohol consumed.

To give a general guide for reducing the risk of harm from alcohol-related disease or injury, doctors recommend sticking to **no more than six to seven standard drinks per week and not more than 4 drinks per day for men and about half that for women**, for a healthy adult.¹³ However, one needs to stay under both daily and weekly limits. The recommendations are different for men and women as both are physically different in terms of size and weight, and water content in bodies.

In a recent article, Dr Sandeep Satsangi, Consultant Hepatologist and Liver Transplant Physician, Apollo Hospitals, Bangalore, said that any consumption of over 20 gm per day is considered significant and potentially harmful. To illustrate, 10 gm of alcohol is present in 30 ml of whiskey, 100 ml of wine and, 240 ml of beer.¹⁴

2.5.1 ALCOHOL BY VOLUME (ABV)

To stay in control of one's drinking, it is important to first understand Alcohol by Volume (ABV), a globally adopted standard.

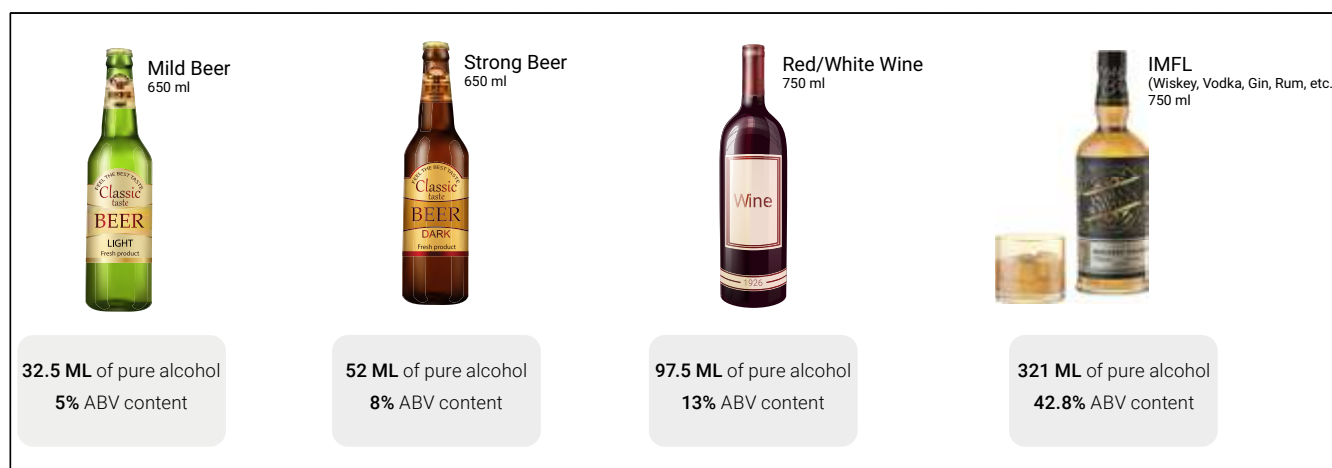
ABV is the measure of the percentage of milliliters of alcohol or pure ethanol in an alcoholic beverage. Different types of alcohol contain varied quantities of ABV. For e.g., mild beers contain 5 percent; strong beers contain 8 percent; red and white wines contain ABV in the range of approximately 12-15 percent; and, hard liquor (whiskey, vodka, gin, rum, IMFLs, country liquor etc.) contain ABV in the range of 38 to 42.8 percent.

In the United Kingdom, **'Units of Alcohol'** provides a guideline on total alcohol consumption to quantify the actual alcoholic content within a given volume of an alcoholic beverage. Other countries like Australia, Canada, New Zealand and the U.S. use the concept of a **'Standard Drink'**, definitions of which vary across countries. One unit of alcohol in the UK is defined as 10 ml or 8 gms or pure alcohol. Typical drinks contain 1-3 units of alcohol.

To illustrate through a simple calculation, a 750 ml bottle of wine with approximately 14 percent ABV (14 ml pure alcohol per 100 ml of wine), translates to 105 ml of pure alcohol per bottle. In comparison, 180 ml of hard liquor like whiskey, vodka, rum and IMFLs containing 40 percent ABV translates into consumption of 72 ml of pure alcohol. Similarly, a 650 ml bottle of mild and strong beer containing 5 and 8 percent alcohol respectively, translates to consumption of 32.5 ml and 54.4 ml of pure alcohol per bottle.

Hence, one may get intoxicated on 180 ml of hard liquor (40 percent ABV) but not in 180 ml of beer which has 5-8 percent ABV, as distilled spirits contain more alcohol by volume or ABV as against beer or wine. Hard liquor contain a higher alcohol by volume (ABV) than wine and beer. The maximum permissible limit for alcohol content in a beverage in India is 42.8 percent

Pure Alcohol Content Across Beverages



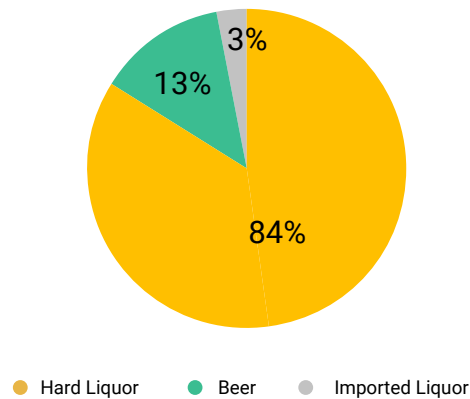
As of 2017, the total market share of hard liquor is 84 percent (which includes, whiskey, vodka, gin, rum, IMFL and country liquor), 13 percent beer and 3 percent imported liquor. Hard liquor has higher alcohol content from that of beer and wine.

13 <https://mumbaimirror.indiatimes.com/others/health-lifestyle/how-much-alcohol-is-safe-to-drink/articleshow/69666148.cms> <https://mumbaimirror.indiatimes.com/others/health-lifestyle/how-much-alcohol-is-safe-to-drink/articleshow/69666148.cms>

14 <https://www.news18.com/news/lifestyle/this-is-your-cue-to-drink-alcohol-in-moderation-and-not-get-over-drunk-5712667.html>

15 <https://www.breakingthecycles.com/blog/2019/04/10/alcohol-by-volume-abv-and-proof-explained/>

Market Share of Alcoholic Beverages



STANDARD DRINK TO MEASURE INTAKE

A 'Standard Drink' gives the measurement of the amount of pure alcohol (also referred to as ethanol), across different types of alcoholic beverages like beer, wine, or hard liquor. Definition of a Standard Drink and recommendations on maximum consumption of drinks per day or week varies across countries. For instance, in Australia, a standard drink contains 10 grams (12.7 ml) of alcohol; in the U.S. it is 14 grams (17.78 ml); and, in Japan it is 20 grams (25.4 ml). (10 grams of alcohol is approximately 12.7 milliliters in volume).

In India, as per the Food Safety and Standards Authority of India (FSSAI), a Standard Drink is the amount of beverage that contains 12.7 ml of pure alcohol. With this indicator for India, a Standard Drink size is approximately 30 ml for hard liquor (IMFL, whiskey, gin, rum), or 100 ml of wine, or 330 ml of mild beer.

As a general rule of thumb, it takes about one hour for the liver to metabolize alcohol in one standard drink.

3. RECOMMENDATIONS

While no single policy measure can reduce or combat alcohol related harm, incorporating and implementing a range of measures in the overall strategy will help reduce per capita consumption of alcohol.

Recommendations in this report are mainly aimed towards reducing **per capita consumption of alcohol** which has been increasing over the years. Recommendations include a combination of initiatives to create consumer awareness on intake and a set of policy measures aimed at disincentivizing consumption of high alcoholic beverages.

It is important to note that while implementation of the recommendations in this report, if accepted, will majorly be the responsibility of the states, the progress may be monitored by the Ministry of Health at the national level. These recommendations are given to trigger a debate and engage stakeholders to deep dive and further explore implementation outcomes.

3.1 ALIGNMENT WITH WHO'S ACTION PLAN

Awareness and acceptance of the overall negative impact of alcohol consumption on population's health and safety is low among decision-makers and the general public.

One of the guiding principles of the global strategy states that public policies and intervention to prevent and reduce alcohol related harm should be guided by public health interests. The most cost-effective actions include **increasing taxes on alcoholic beverages, having comprehensive restrictions on exposure to alcohol advertising, and enforcing restrictions on the physical availability of retailed alcohol**. By prioritising the most cost-effective policy measures, the WHO secretariat and partners launched the SAFER initiative with an objective to support WHO member states in reducing the harmful use of alcohol by enhancing ongoing implementation of the global strategy and other WHO and UN strategies. The SAFER initiative focuses on support for implementation of cost-effective policy options and interventions. It also aims to protect public health-oriented policy making against interference from commercial interests, to establish strong monitoring systems to ensure accountability, and to track progress for implementing SAFER.

WHO draft report, 'Global Alcohol Action Plan 2022-30' includes specific actions and measures to be implemented at the global level in line with key roles and components of global action. We recommend commitment with WHO's Global Alcohol Action Plan 2022-30' which has set a target to reduce the harmful use of alcohol by at least 20 percent by 2030, once the document is finalised and released. The plan recommends six key areas for global action, and includes action items for member states, WHO secretariat, international partners, civil society organisations and academia.

- 1) Implementation of high-impact strategies and interventions
- 2) Advocacy, awareness and commitment
- 3) Partnership, dialogue and coordination
- 4) Technical support and capacity building
- 5) Knowledge production and information systems
- 6) Resource mobilisation

3.2 CREATING AWARENESS ON PURE ALCOHOL CONTENT ACROSS BEVERAGES

Access to information is one of the major drivers of responsible consumption. As per a NIMAHNS study, an average of five standard drinks consumed on each drinking occasion technically qualifies for a 'heavy drinking situation'. However, amongst public, there is general lack of awareness on the actual amount of alcohol content across various beverages and there is little understanding on what are safe levels of consumption. A report by National Institute of Mental Health and Neuro Sciences (NIMHANS) acknowledges the lack of awareness on how much alcohol is safe fueled by confusing messages regarding alcohol use by health professionals and media.¹⁷

India is among the few countries which does not have any guidelines on what is safe consumption of alcohol. As per Dr Richard de Visser, author and psychologist, India does not quantify what is permissible limit of alcohol consumption. It just gives a vague advice rather than specific count, which leaves a lot of room for assumption for both consumers and health professionals. Looking at 57 countries, including 27 EU member states, Dr Visser found a remarkable lack of agreement about what constitutes harmful or excessive alcohol consumption on a daily and weekly basis and when driving.¹⁸

There is an urgent need for creating awareness of a reference point for measuring alcohol consumption as India's per capita consumption of alcohol is increasing at a fast pace. A 2018 WHO report showed that, from 2005 to 2016 the per capita consumption of alcoholic beverages in India increased from 2.4 litres to 5.7 litres.

While the measurements are not recommendations for how much one should drink, it gives a common reference for people to measure their intake. The table below gives the amount of pure alcohol content across beverage types.

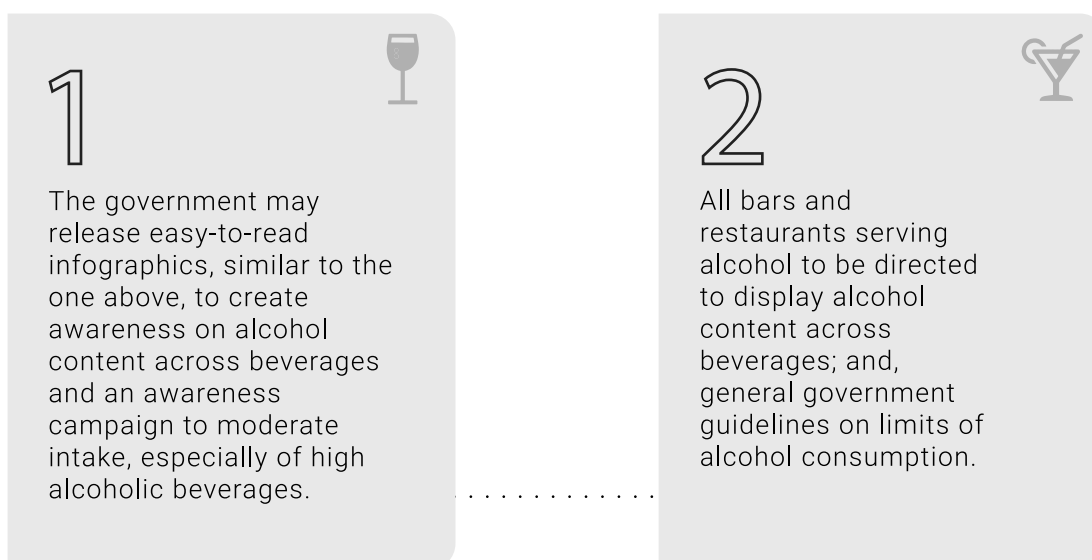
17 Alcohol Related Harm – Implications for Public Health and Policy in India by NIMHANS
18 <https://timesofindia.indiatimes.com/home/science/know-your-limit-booze-guidelines-spell-it-out/articleshow/18282941.cms#:~:text=%E2%80%9CWomen%20>

Beverage	Mild Beer	Strong Beer	Red/White Wine	IMFL
Quantity (ml)	650 ml	650 ml	750 ml	750 ml
% of alcohol content / ABV	5%	8%	13%	42.8%
Total Alcohol Content (ml)	32.5 ml	52 ml	97.5 ml	321 ml

Some spirits like IMFL, rum, gin and whiskey are mixed in with other products like water, soda, aerated drinks, juice and tonic water prior to consumption. While the mixing depends from person to person and there is lack of data to assess the average strength of consumed spirits, it doesn't change the evidence that India's consumption of high alcoholic beverages is amongst the highest in the world.

On part of the government, the first step would be to create awareness on quantity of pure alcohol content across beverage types:

Creating awareness on the alcohol content in beverages will go a long way in creating consumer awareness on intake and promote self-regulation.



3.3 HEALTH DEPARTMENTS TO BE CONSULTED WHILE MAKING EXCISE POLICIES

Target of state excise departments is to increase state revenues and may not particularly look at health and social aspects. As per Dr. Pankaj Chaturvedi, the responsibility of reducing alcohol consumption in India is given to the state excise departments. However, since the mandate of excise departments is to increase revenue and all their efforts are geared towards revenue generation, they will not be able to achieve reduction of alcohol consumption. Today, there is need for people to understand the harms of alcohol consumption as well as the need to control its access especially amongst the youth.

Rather than looking at the alcohol sector from the point of revenue generation, the government should direct its duty structure to take into consideration the broader social aspects that include higher healthcare and social care costs, crime, loss of life, accidents, and loss of employment which are directly linked to high per capita intake of alcohol.

For ensuring that health is also part of government's agenda, health departments should also be made part of consultation processes while formulating the state excise policies. Such a step is likely to go a long way to ensure moderation and reducing per capita consumption instead of taking the extreme step of complete alcohol prohibition.

3.4 LEVY DUTIES BASED ON ALCOHOL BY VOLUME (ABV) CONTENT

As per a recent 2019 report by the National Drug Dependence Treatment Centre and All India Institute of Medical Sciences, country liquor (desi sharab) and IMFLs were the most preferred beverages in India.

Heavy drinkers are more likely to consume hard liquor and strong beers and tend to consume cheaper alcoholic beverages. This is also especially true amongst young adults who are very price sensitive.

In Section 2.4 of this report 'Effect of Taxation on Consumption', **the numbers indicate that beverages with high alcohol content attract the lowest duties.** This makes beverages with high alcohol content like hard liquor, especially IMFLs more affordable as compared to low alcoholic content beverages like beer and wine. Hence, **the existing duty structure seems to encourage both production and consumption of beverages with high alcohol content and does not seem to meet the government's objectives of reducing alcohol consumption.**

To reduce per capita consumption of alcohol, we recommend that the tax structure should be in line with actual alcohol by volume (ABV) content in beverages. This will ensure that high risk or heavy drinkers pay for costs relative to their consumption and lower risk drinkers are not penalised for consumption of low alcoholic beverages. It will also encourage high risk drinkers to move towards consumption of low alcoholic beverages.

Reducing overall alcohol consumption as well as per capita consumption of alcohol can be addressed through the right taxation policies, which should be aimed towards addressing health and social harms, which the report covers in its earlier sections.

The government may also direct its taxation policies to also incentivise production of alcoholic beverages with lower alcohol by volume (ABV) content. This will encourage manufacturers to bring about lower alcohol by volume products in the market.

Recently state governments like Haryana, Uttar Pradesh, West Bengal and Rajasthan brought down taxes on beer to moderate the intake of alcohol consumption.

As the next steps, we recommend that the government introduce various tax slabs based on alcoholic content, in consultations with wider stakeholder groups and suggest a revenue neutral reform which would continue to bring about the same revenue as the current system.

3.5 SET MINIMUM UNIT PRICE (MUP)

Alcohol in India is very cheaply available. Price control measures are shown to reduce heavy drinking and alcohol related harm, as those who consume higher amounts of alcohol pay more. International reports suggest that raising the price of the cheapest form of alcohol by setting a minimum unit price will have significant impact on risky drinking. Minimum Unit Pricing (MUP) sets a minimum price of any alcoholic drink depending on the amount of actual alcohol content in grams or milliliters in it.

For instance, in 2018, Scotland became the first country in the world to introduce Minimum Unit Pricing for alcohol, at 50 British pence per unit (8 g) sold. This means that a bottle of beer containing 2.5 units of alcohol cannot be sold under £1.25 and a bottle of wine with 10 units of alcohol cannot be sold under £5. In the same year, Ireland introduced the Public Health (Alcohol) Act to tackle alcohol misuse and underage drinking. One of the measures was introduction of Minimum Unit Pricing (MUP). Wales followed suit.

Research from Newcastle University found that alcohol sales fell by almost 8 percent after the policy was introduced in Scotland. In Wales there was fall in sales by 8.6 percent, when compared with the West of England. A Canadian Research Study also suggested that minimum pricing policies may reduce total alcohol consumption and shift from high strength beverages.²⁰

Vietnam imposed a minimum price policy on beverages based on the pure alcohol content and Russia introduced minimum price for vodka in 2010.

Setting a Minimum Unit Price is likely to result in reducing the proportion of young people who are heavy drinkers, reduce underage and binge drinking, delay intentions among younger teenagers to start drinking and slow progression towards drinking larger amounts.

According to the framework recommended by WHO, for tax and price policy, we recommend that the government mandate a minimum unit price for the cheapest forms of alcohol as this will go a long way in reducing per capita consumption of alcohol.

3.6 BAN ON SALE OF ULTRA SMALL PACKS

One of the main reasons for introduction of ultra-small packs of liquor (miniatures) was to increase consumption and contributing to higher revenues for the government. Alcohol in ultra-small packs with beverages high strength was sold across most states to increase sales and increase affordability. This is against the government's objective of reducing the consumption of alcohol.

If we compare this with consumption of cigarettes, several state governments like Delhi, Maharashtra, Karnataka and Chhattisgarh banned the loose sale of cigarettes and bidis, in a bid to reduce consumption of tobacco.

Similarly, our recommendation is to consider implementing a complete ban on the sale of alcohol in all forms of ultra-small packs or miniatures, sold in tetra, plastic or glass bottles, below a certain quantity for e.g. 60 ml or 90 ml.



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About Consumer Voice

Consumer Voice is a voluntary organization which works towards protection of consumers in India. Based in New Delhi, the organization has championed consumer education in the country since 1983. Its activities have been supported by the Ministry of Consumer Affairs besides other ministries and departments.

The organization has been working on tobacco control campaigns (smoking and smokeless) since the last seven years, as-well-as around the ban of e-cigarettes in India. The organization advocated that all tobacco products including bidis, cigarettes and smokeless tobacco be taxed at the highest rate and carried out general public awareness campaigns about the ill effects of tobacco consumption.

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