

ZERO% TOLERANCE

OVERVIEW OF THE EXPOSURE OF CHILDREN AND YOUTH TO ALCOHOL AND
THE SUGGESTIONS FOR AN INSTITUTIONALIZED APPROACH TO THEIR PROTECTION IN BIH



INTRODUCTION

THE NECESSITY FOR STRATEGIC SOLUTIONS

The treatment of the alcohol consumption issue has exceeded the boundaries of the issues exclusively related to public health. In the contemporary society, alcohol has become a wider sociological problem which impacts almost every social sphere - economy, social policy and public safety, and even the protection of the environment.

Center for Youth Education addresses this issue from the perspective of those who are not protected, yet their exposure to the influence of alcohol is the strongest – children and youth. Through the numerous researches indirectly referenced through this document, a disturbingly significant influence of alcohol industry to the health and safety of children and youth was identified.

The statistics of the Cantonal Ministries of internal affairs for the years 2017 and 2018 indicate that alcohol is present (often as the direct cause) in the vast majority of the documented cases of domestic violence. Children and youth are exposed to an array of risks in these cases – the primary risk level is the problem of growing up in an environment which threatens their safety, preventing them from having a safe and successful period of growth and personal development; the secondary risk level contains the possibility of a transgenerational transfer of these behavioural models. This phenomenon creates closed circles of the issue which cannot be tackled unless we first deal with the causes, such as the uncontrolled consumption of alcohol and other harmful substances.

According to the annual reports of BIHAMK, one person in Bosnia and Herzegovina dies in the traffic accidents every day. The majority of the traffic accidents which include fatal outcomes or severe injuries, alcohol was detected in the drivers' blood samples. In the majority of such cases, young people between 15 and 30 years of age were involved. According to this data, it is evident that no significant improvement in terms of safety of children and youth in traffic was accomplished in the past 10 years.

Bosnia and Herzegovina is culturally and sociologically specific, and this context affects the question of alcohol consumption among the children and youth. Apart from the growing influence of peer pressure in the contemporary society (not only regarding the alcohol consumption), children and youth in Bosnia and Herzegovina are exposed to the pressure of the cultural treatment of alcohol in their environment. Alcohol is very often presented as cultural heritage.

Bottles of hard liquor (rakija – ca. 40% of pure alcohol) are used as presents, carrying sentimental, cultural and even touristic values. Even the production process of rakija is often treated as a positive tradition which focuses on socialization and creating bonds among neighbours. On the other hand, this production is inadequately covered by the legislation, meaning there are no laws defining the restrictions in quantity and safety requirements of the production. In these “family gatherings”, children and youth are often present, and this is in many cases the initial exposure to alcohol where they can get encouraged to taste the product.





Due to this cultural treatment, alcohol is often present in schools. Rather often can we see cases of teachers avoiding being sanctioned despite working under visible influence of alcohol for years. Additionally, numerous schools tolerate (and in some cases even indirectly encourage) consumption of alcohol during the school trips and graduation parties. Cultural “acceptability” of alcohol is retained in the popular culture of the contemporary age, which treats alcohol drinks as basic household items. Although alcohol was romanticized throughout the history of the traditional art, just like in any other European culture, the contemporary pop-folk music is going as far as romanticizing the images and concepts such as breathalyser tests, drunk driving, alcohol-induced coma, alcohol poisoning, etc.

This research is the first document in Bosnia and Herzegovina containing every aspect of the challenge to tackle the root of the alcohol consumption issue, as well as its negative influence on children and youth. This multi-layered issue can not be solved by a single legislative act. We need an innovative and multidisciplinary approach which will find adequate answers to the multitude of open questions regarding the issue of alcohol consumption among the children and youth.

Through the many years of observation, analysis and symptomatic suppression of this issue in our local community, we began noticing the necessity of a strategic approach, i.e. a blueprint of suggestions for the legislative changes which will establish a mechanism to tackle the issue of alcohol consumption among children and youth. This document, based on the positive examples from other countries (primarily EU members), contains three chapters tackling three topics: the availability of alcohol, promotion of the alcohol brands and the pricing policy of alcohol products.



The first chapter talks about the availability of alcohol and the laws which regulate the availability to minors. The European Union standards will be compared to the legislative framework in Bosnia and Herzegovina and a set of suggestions will be presented regarding the changes in practice in the local communities, as well as on the national level.

The second chapter deals with marketing and promotion of alcohol which targets children and youth. This chapter will talk about the international standards of restrictions in promotion of alcohol brands and about the existing legislation in Bosnia and Herzegovina and its enforcement. Due to the similarity between this category of products and tobacco, we will also make a comparison with this category's promotional restrictions and their long-term efficiency.

The third chapter talks about the pricing policy of the alcohol products, the excise tax standards in the European Union and the excise tax laws in Bosnia and Herzegovina, combining it with the possible challenges countries face when introducing new excise tax laws and adapting to the European standards.

The three approaches suggested by this document are also defined through the ten articles of the European Charter on Alcohol and the Strategy for Alcohol of the European Union, and these documents are the baseline for our strategic suggestions.

1 UNCONTROLLED AVAILABILITY OF ALCOHOL TO CHILDREN AND YOUTH

The first of the three segments of the strategic prevention is the control over the availability of alcohol products. A long-term strategic planning is impossible without the immediate control of the production, distribution and trade of alcohol, with special attention to the protection of children and youth.

The restriction of availability of alcohol in Bosnia and Herzegovina is defined by law on both entity and cantonal level. Cantonal Laws on public order and peace define measures for serving and selling alcohol to minors and visibly intoxicated people. Federation of Bosnia and Herzegovina also has two laws regarding serving and selling alcohol to minors.

The abovementioned laws are the Law on Internal Trade (FBiH) and the Law on Hospitality (FBiH). Article 10 of the Law on Internal Trade prohibits sale of alcohol and tobacco to minors but also defines the requirement of the shops to display a sign reminding the customers about this restriction. The Articles 63 and 64 define the fines for the infringement of the Article 10.

Article 11 of the Law on Hospitality (FBiH) defines that the alcohol drink is to be served in the original package with all the required information clearly visible – producer, importing company and the quantity. Article 13 prohibits serving alcohol to minors and defines the requirement of the facility to display a sign reminding the customers about this restriction. Law on customer protection (BiH) does not explicitly treat selling and serving of alcohol to minors. On the other hand, the same law in Serbia defines the relation between the salesperson and the customer regarding alcohol trade in several occasions. It mentions the regulations related to the sales and inspections, but the availability of alcohol to minors as well.

PHOTO: One of the warning actions conducted by Center for Youth Education - stickers reminding the customers of the sales restrictions



This segment of prevention of alcohol consumption is one of the cornerstones for further accomplishments in terms of the Sustainable Development Goals defined in the Agenda 2030. Alcohol represents a direct barrier for 13 goals and 53 targets, but it can also be connected to the problems which to some extent affect all 17 goals.

For example, the third goal is to ensure healthy lifestyle and well-being for all people at all ages. Apart from the strategical approach to decreasing the mortality of the preventable and curable diseases, this goal also includes the plan to improve the quality of life of all inhabitants of planet Earth, which in every sense implies a strong plan of prevention of consumption of all harmful substances, such as drugs, tobacco and alcohol.

Twelfth goal deals with the responsibility in production and consumption. Although this goal is directly related to the influence of the irresponsible production on nature, we can also include the irresponsible production and distribution of alcohol, since it has an indirect impact on the environment but also on the health of the people who represent a part of the nature itself.

Sales control is explicitly mentioned in the Alcohol Strategy of the European Union stating that the member states should decrease or restrict the availability of alcohol and ensure implementation of the adequate measures.



1.1. COORDINATED LAW ENFORCEMENT CONTROL

The cantonal Ministry of internal affairs officials are only authorized to issue penalties regarding the Law on public order and peace in case they detect someone serving or selling alcohol to a minor. This law defines penalties for serving alcohol to minors and in the majority of cantons the penalties for natural persons vary from 200 to 1000 BAM.

The Inspectorate of the Ministry of Economy is authorized to issue penalties for the Law on Hospitality (Article 13) and the Law on Internal Trade (Article 10). The penalties are defined for the legal persons and vary from 500 to 5000 BAM (Law on Hospitality) and 3000 to 15 000 BAM (Law on Internal Trade).

The current statistics of the enforcement of these two laws are devastating. The majority of the penalties are issued for failing to display the warning sign about the legal prohibition of selling and serving alcohol to minors. According to the data collected annually by Center for Youth Education, there are large differences between the compilation formats of the Cantonal statistics.

However, what's common to all cantons is that penalties for these two laws are rarely issued – during the year 2018, 7 out of 10 cantons issued no penalties, while in the rest the penalties were issued for failing to display the warning signs.

Several European countries such as Austria have established control mechanisms for sale of alcohol to minors using the mystery shopper followed by an inspector. In case the mystery shopper manages to buy alcohol without providing ID, the salesperson is legally obliged to sign the statement confirming they sold the alcohol product without confirming the age of the customer.

With coordinated actions of the Ministries of internal affairs and the Inspectorate in the shops, supermarkets, bars and clubs, there would almost certainly be more issued penalties.

Ultimately, this would result in a significant increase of the income of the Cantonal budget and in an increase of inter-sector cooperation in order to tackle the issue of the alcohol consumption and to protect the health and security of the children and youth.



1.2. SALE RESTRICTIONS FOR TIME AND LOCATION

Bosnia and Herzegovina has no legal restrictions concerning selling alcohol in a specific timeframe, close to the major roads or in the vicinity of educational institutions. The current restrictions are only tied to the internal statutes of the specific educational institutions and Cantonal Ministries of Education.

Examples of efficiency of such restrictions can be found in the legislation of Russia, Turkey, Sweden and other countries which not only have sale restrictions in the near vicinity of schools but also promotion restrictions.

In some of these countries, it is obligatory by law that schools must display educational posters about the harms caused by consumption of harmful substances, including alcohol.

There are no specific licences for selling or serving alcohol. Sweden, on the other hand, has a multi-level control of alcohol trade. One of these mechanisms is restricting alcohol trade to accredited shops under specific terms (working hours, location of the shop, etc.)



PHOTO: Device used for production of rakija, traditional plum brandy made in the Balkans

1.3. HOMEMADE ALCOHOL PRODUCTION CONTROL

Production, distribution and trade of rakija is not regulated by law in the sense of availability control to children and youth. In Federation of Bosnia and Herzegovina an act was passed in 2014 regulating the minimal technical and quality requirements for the production of rakija and ciders. Republic of Srpska has a Law on wine and rakija since 2009 and it also defines the obligatory licencing procedures for the producers.

In Croatia, the producers have the obligation to pay 100 HRK for a production which exceeds the legal quantity for personal use (20 litres of pure alcohol). It is impossible to estimate how much rakija is annually produced in Bosnia and Herzegovina, so this issue both creates a financial consequence and discredits the potential researches of the scope of alcohol consumption problem, especially among children and youth.

One of the positive examples of this problem can be seen in Russia, which managed to produce a continuing decline of alcohol consumption using a strategic approach in prevention, despite the long tradition which kept the average consumption on an alarming level. Before any fiscal interventions, a recording obligation with special labels for every alcohol product (whether imported or produced in Russia) was introduced and this enabled the country to have precise statistics.

After this measure was passed, it created a new possibility of efficiency tracking for measures related to availability, promotion and pricing of alcohol. The statistics showed that the restrictions made a positive impact on the average life expectancy in a rather short period.

1.4. CHANGES TO LEGAL AGE FOR ALCOHOL CONSUMPTION

Despite the legal prohibition of serving and selling alcohol to minors, many studies show that the average age of the first consumption is rapidly decreasing. The Special Report of the Ombudsman for Children in Republic of Srpska which refers to two researches (2008 and 2011) indicates that every third child gets intoxicated at least once before the age of 13.

Hard liquors should have a special treatment in the control of the availability because they are often present in the first alcohol related experiences of the younger minors. This still does not mean that the products below 3.5% of alcohol should not be treated as harmless products. The best example of an intervention regarding this issue can be seen in Sweden: apart from reducing the availability of alcohol to minors, Sweden changed the legal age for alcohol consumption from 18 to 20 years for the alcohol drinks with more than 3.5% of pure alcohol.





1.5. SCHOOL ALCOHOL POLICIES

Although schools usually insist on restrictions of alcohol consumptions within their activities, there are numerous examples of these rules being disregarded. Alcohol consumption is often tolerated on graduation parties and school trips, although these can also be categorized as school activities. According to the Convention of the Rights of the Child, namely the Article 24 (which deals with the health of the child and prevention of the harmful practices which can affect their health) and the Article 33 (which protects the child from the consumption of the psychoactive substances), we can consider this a partial violation of their rights.

Schools' internal statutes contain some vaguely defined restrictive rules about the consumption of alcohol, but these measures should be strengthened through a unified set of documents which would exclusively treat alcohol consumption. These alcohol policies would also contain disciplinary procedures for the potential violators which could be defined according to the needs of the particular institution.

Following the example of the school alcohol policies, it is necessary to create and pass alcohol policies for other institutions and organizations, especially those which have a direct or indirect contact with children and youth.

2 TARGETED PROMOTION OF ALCOHOL TOWARDS CHILDREN AND YOUTH

Alcohol industry uses a wide array of promotional mechanisms to establish contacts with their potential customers, from direct audio-visual advertisements to sponsoring sports and culture events. Alcohol brand advertisements are everywhere, and the content of these advertisements very often uses hints of sensitive topics which are (for that reason) attracting attention of children and youth. Numerous advertisements use topics related to sexuality, connecting social achievements to consumption of their product, and some even justify the consumption with the cultural treatment of alcohol. For children and youth these messages have an additional value. This is the period in which the young person is extremely sensitive to the question of affiliation to groups and (sometimes entirely conforming) identity, this kind of message can present a direct answer to their question of social success.


There are various restrictive measures for promotion of alcohol on the national levels all across European Union, defined through the national regulations of commercial communication. This issue came to the EU spotlight in 1989 when the Television Without Frontiers (TWF) directive was designed and passed by the member states. This system was made to harmonize the previous measures in the member states which would prevent violations of the individual laws through international TV broadcasts.

The currently active EU Directive 2010/13/EU defines the criteria according to which the promotion of alcohol must be adapted. It states that the alcohol promotion on TV must not target minors or portray them consuming alcohol; it must not portray connections between alcohol and physical, sexual or social abilities; it must not promote irresponsible consumption of alcohol.

This directive received a lot of criticism since 2010 and it mostly refers to the lack of strictness in these guidelines, which relies on the social responsibility of the alcohol industry. It also tackles the lack of guidelines tackling sponsorships and product placement, as well as transporting promotional material abroad, i.e. out of the borders of a specific law (e.g. a type of promotion which would not be allowed in Sweden can be legally broadcasted through the Swedish channels on the territory on Great Britain).



PHOTO: The Los Angeles City Council completely banned alcohol promotion on the City-owned advertising spaces



In Bosnia and Herzegovina, this segment is regulated by the Code of Commercial Communication of the Regulatory Agency of Communication, which was passed on 17th December 2015. The promotion of alcohol is not prohibited, unless it explicitly defines minors as a target group, but there are several qualitative restrictions which are created for the protection of the customers (especially minors) and to prevent excessive consumption of alcohol, resulting in negative health effects.

Paragraph 2 of the Article 5 regulates the commercial communication of the alcohol drinks:


Commercial communications related to alcohol drinks shall not:

- a) Specifically target minors, and the persons which are connected to alcohol consumption in these commercial communications shall not be minors or resemble minors;*
- b) Connect alcohol consumption to the improvement of physical abilities or abilities to drive a motor vehicle;*
- c) Claim that alcohol has medicinal, stimulating or sedating properties or that it can be used to solve personal problems;*
- d) Encourage excessive alcohol consumption or portray abstinence or moderate consumption in a negative fashion;*
- e) Emphasize the high alcohol content as a positive property of the alcohol drink;*
- f) Create an impression that alcohol consumption leads to social or sexual success.*

Article 6 deals with the commercial communication related to minors. Paragraph 1 says:

Commercial communications that encourage behaviour which could endanger health, psychological and/or moral development of minors are prohibited.

However, Regulatory Agency for Communication does not possess mechanisms of inspecting the communication channels and therefore they primarily rely on complaints about the violations of the Code. Additionally, practice has shown that the financial penalties for Code violations are not adequate because certain media companies do not change their behaviour despite the constant punishments.



2.1. MORE CONTROL OF THE COMMERCIAL COMMUNICATION

Analysis of the commercial communication in the United States of America which has a lower alcohol consumption levels per capita than most of the countries in the European Union indicated that a complete ban on alcohol advertisement would reduce the monthly consumption by 25%. The OEBS (2000) data show that the states which have alcohol advertisement restrictions also have a 16% lower consumption rate and 23% less traffic accidents.

The Commercial Communication Code defines the content regulations for the alcohol products advertisements, however there are no quantitative restrictions (length, time of broadcast, number of repetitions). The current time restrictions are only there to protect the informative and children's program from the alcohol brand advertisements.

With the revision of the existing regulations in the Code and designing new ones, it is also necessary to redesign the penalty policy by introducing penalty points for the media companies which repeat their violations, which would ultimately lead to a suspension of their frequency and/or revoking their licence.



PHOTO: In their pseudo-prevention campaign, Tuborg sponsored new night bus line in Sarajevo and promoted it targeting the young people under the slogan - you drink, we drive

PHOTO: The slogan of Ožujsko beer (moms and dads rule) which insinuate that it is socially acceptable for parents to consume alcohol



2.2. RESTRICTIONS FOR THE PRINTED ALCOHOL PROMOTION

There are no legal acts in Bosnia and Herzegovina which explicitly define the qualitative norms for the printed advertising. For this form of promotion, it is only necessary to pay the rent for the advertising space and to meet the minimal safety and ecology requirements (e.g. minimal distance from of the jumbo poster from the road, placing the posters only in the specific advertising spaces, etc.) which are defined by the Policy on Placement of the Commercial Signs on the Roads (FBiH). Jumbo posters next to the roads, posters and even the inventory of cafes are often branded with the logos and names from the alcohol industry.

It is necessary to create specific restrictions for the positioning of the printed advertisement for alcohol products (minimal distance from the educational institutions, etc.) or even completely ban alcohol industry advertisements in specific zones (e.g. restrictions on the municipal level). Since 2016, Montenegro has a ban on alcohol advertising of hard liquors on the public transportation, in the vicinity of kindergartens, schools, universities, etc.

The content of the printed advertisement of alcohol is very different from the electronic media versions. If there was a document which would regulate the restrictions in printed advertisements consistent to what Regulatory Agency of Communications are using to evaluate the electronic commercial communication, the printed advertisement would no longer have an uncontrolled content.

2.3. BANNING ALCOHOL PROMOTION IN SPORTS

Alcohol industry is present in the sports and culture events, often under the excuse of the social responsibility. Many sports clubs have sponsorship deals with companies which produce alcohol drinks and promote these brands through their promotional material, on their sports equipment, by renaming their club, competitions, stadiums, sports halls, etc.

Apart from the international sports competitions which have sponsorship contracts with the alcohol industry companies, there is also a growing trend of establishing sponsorship deals between local competitions (e.g. athletic races in the towns of Bosnia and Herzegovina) and the alcohol brands, both local and international. Since the primary target audience of these events are children and youth, the promotion of alcohol brands (and even pseudo-promotion – promotion of the non-alcoholic beverages made by the companies widely recognized as an alcohol brand, using the same logo and slogan) should be restricted.

As sports are one of the rare efficient mechanisms of prevention of consumption of harmful substances, the sports associations on all levels should devote more time to creating regulations for their respective competitions in order to limit the impact and the presence of alcohol brands in the sports events. The first step they could take is to limit or completely ban the materials or sports equipment with alcohol brands' logos in the youngest categories.



PHOTO: Promotion of the joint advertising campaign of the beer brand PAN and football club Čelik (Zenica)

2.4. TIME LIMITS FOR ALCOHOL PROMOTION IN ELECTRONIC MEDIA

It is very important that the quantitative restrictions for alcohol promotion are reviewed and improved and that the timeframes for alcohol promotion are redesigned. Currently the alcohol promotion often occurs during the afternoon and evening hours, alongside the highest rated program. There is also a practice of indirect promotion through specific programs – e.g. competitors in a reality show drinking alcohol beverages of a specific brand.

Alcohol promotion should be treated as a program for adults, and it should be limited to the timeframes appropriate for the adult program and broadcasted with special warning signs for parents. The greatest barrier for a complete ban of alcohol brand promotion during the programs available to children and youth are the sponsorship contracts connected to the exclusive broadcasting rights for specific programs which oblige the broadcaster to use the sponsored promotional material alongside the mentioned program (e.g. beer advertisements with the world's largest football competitions).

The first step towards the total ban could be the separation from the rest of the advertisements, with a special announcement which mentions that the following program promotes the alcohol products and that serving and selling such products to minors is illegal.



2.5. LIMITING ALCOHOL PROMOTION ON SOCIAL MEDIA

In the suggestions for the new Alcohol Strategy of EU, which were presented in the Council of Europe on 29th April 2015, it is stated that the member states should urgently create adequate measures to reduce international trade of alcohol over the internet.

Also, the member states should establish a strict control over the promotion of the alcohol drinks, especially if minors are the target audience. Controlling social media is a extremely delicate question because it can easily be regarded as a privacy violation issue, however when the users (especially companies) violate the rules and regulations of the country where their influence is present, they should be adequately penalized.

For this reason, it is necessary to establish a mechanism which would evaluate the commercial communication on the social media and react when illegal trade and promotion is noticed, especially if it directly targets minors using the internet tools for targeted promotion.



PHOTO: In the sponsored video which promotes the Nektar beer giveaway, a nursery rhyme is used. The video was viewed by more than 200.000 people in a relatively short period



PHOTO: Canada - eight month experimental phase with the warning labels on alcohol products (2017)

2.6. WARNING LABELS AND SPECIAL PACKAGES

Although the practice in promotion limiting for the tobacco industry indicated that the warning labels are not the best tool to reduce the problem of consumption, this mechanism should not be completely disregarded. There are three possibilities regarding the specific measures related to the packages of the alcohol products.

The first possibility is related to the harmful substance warning labels, similar to those which are currently used for the tobacco products and which tend to make the product look less appealing to the customer. France was the first EU member which started an initiative to inform the customers about the dangers related to alcohol consumption. Since 2007, there is a legal obligation that the package of the alcohol drink must contain the text “consuming alcohol during pregnancy, even in small quantities, can have serious consequences on the health of the child” or a corresponding pictogram.

The second possibility is less explicit but it could have a significant effect. Researches around Europe have shown that the customers are unaware of the carbohydrates and fats, calories in different alcohol drinks and the substance used in their production. This problem could partially be tackled if there were measures which define the obligation of the producer to write the calory content of the product on the label.

The third possibility which was a hot topic in the recent period in several European countries is the packaging standardization which would impose restrictions in the use of colours, the shape and size of the letters, as well as the messages and information the package label contains. The goal of these measures is to make the package less appealing which would result in a reduced consumption out of curiosity.

3 ALCOHOL PRICE POLICY

Although excise taxes and other specific taxes for alcohol drinks result in numerous positive social, health and economic effects, the most common motivation to impose such measures is the increase of the financial income. European Union defines the minimal values of the excise taxes for the member states, which means that these countries have the freedom to define the excise taxes which are higher than these proposed values according to their own needs and economy strategies, and for this reason there are visible differences in the incomes from excise taxes in different countries. There should be more efforts to harmonize the excise tax rates in different member states, and to create systematic solutions related to the social and health policies of the member states, which would further reduce the profitability of illegal international trade of alcohol.

There is a strong theoretical and moral foundation for the alcohol taxation. The taxes in this case include only the excises for alcohol beverages and not the taxation of alcohol as a good with various other purposes. Essentially, the taxation of alcohol is based on the necessity of a controlled consumption. Alcohol consumption is regarded as a negative behaviour which causes negative consequences for the society. Alcohol causes numerous health issues, traffic accidents, antisocial behavioural patterns and many other social issues. For this reason, excises are viewed as an instrument for regulation of the market inefficiency.

Bosnia and Herzegovina does not have a special alcohol excise tax law. Instead, the common Law on Excise Tax is used which defines the alcohol excise tax rate, as well as other goods which are subject to this form of taxation, including foods, books, medication, etc.

In the majority of the EU countries (23 out of 28) alcohol excise rates exceed than the minimal rate by 150%. For example, if the proposed minimum for the excise tax on beer is 1.84€ on quantity of absolute alcohol in 1000 litres of the product, this ultimately means the rate will be 0.18 BAM per litre of the product if the beer has 5% of alcohol content.

Article 18. of the Law on Excise Tax of Bosnia and Herzegovina defines the excise of 0.25 BAM per litre of beer while Serbia has the rate of 25.11 RSD, which is approximately 0.42 BAM per litre of 5% alcohol beer. On the other hand, Serbia has a fixed excise tax rate of 2.17 BAM per litre of rakija, while in Bosnia and Herzegovina the rate is 8 BAM per litre of absolute alcohol, which means that excise tax rate for a litre of 40% rakija equals 3.20 BAM.

These regional discrepancies would be avoided by accepting the European excise tax standards, and this would reduce the motivation for the international alcohol product smuggling.

3.2. REDESIGNING THE PRICING POLICY



PHOTO: Sale price of a bottle of Sarajevsko beer: 0,90 BAM or 0,45€

Alcohol in Bosnia and Herzegovina is culturally treated as a basic household grocery, and not a luxury. One of the main reasons for this is the ratio of average prices of alcohol products and other products. The prices of the vast majority of brands of beer for a 0.5 l can is between 1 BAM and 2 BAM. Comparing this to the 0% beers will show that there is no difference in pricing. The pricing policy is strongly affected by the fact that beer and wine are in the category of food products, which dramatically increases the availability of these products to the young people.

This context is a direct barrier for a prevention based on promotion of health lifestyles and the programs which motivate the young people to buy healthy products which are in many cases less appealing and also much more expensive than alcohol beverages. Apart from the increase of the budgeted income, this should be an additional reason to increase the taxation rates on alcohol. If there were more benefits for the shops, cafes, restaurants or even events which insist on the consumption of healthy products, we could establish a new positive climate for the proactive prevention of alcohol consumption.



3.1. CHANGES IN THE ALCOHOL TAXATION POLICIES

According to the Indirect Taxation Authority data, in 2017 Bosnia and Herzegovina had an income of 80 million BAM only from the alcohol excise tax. With the adequate revision and adaptation to the European standards, this number could be significantly higher, because of the fact that during the same period, Bosnia and Herzegovina had an income of 645 million BAM from the tobacco excise. Although suggestions similar to this one were presented in the highest bodies of the legislative authority several times, no substantial improvement was made.

The alcohol excise rate must be increased but there must also be a revision of the expenditure strategy for the gathered excise income, meaning that there should be new mechanisms of support to the health sector from these funds. This money could also be used to build and improve sports infrastructure, children's playgrounds and to support the organizations and institutions which focus on prevention.

Apart from all the direct consequences of these interventions, the increase in excise tax rates for the harmful products, a potential space for reductions in other excise tax and other tax rates would be created, for the products such as food, books, medications, etc.

CONCLUSION

MULTI-DISCIPLINARY APPROACH AS THE RECIPE OF A SUCCESSFUL PREVENTION

Although alcohol has been treated as a multi-layered social issue for many years in other countries, the prevention and harm reduction measures which exist in Bosnia and Herzegovina still treat alcohol as an issue exclusively related to the public health. It is true that alcohol is one of the leading causes of many non-communicable diseases, or lifestyle diseases, which result in a high mortality of children and youth, a high rate of malignant diseases, heart diseases, etc. However, the social and environmental impact of alcohol is much wider than its aspect which affects the public health and it is impossible to tackle it through the existing mechanisms which only treat the health-related consequences of alcohol consumption.

An inter-sector cooperation is needed to establish a multi-disciplinary approach which would combine prevention and restrictive measures and affect the root problems.

A successful prevention is only the one which is based on proof. Examples and suggestions mentioned in this document have been tested in other countries which have much more successful strategies against alcohol consumption. Combining these measures, we can create a climate which would change the cultural image of alcohol and ultimately affect the attitude of the people in Bosnia and Herzegovina. The value of these changes will only be visible after a long period, but some effects will be measurable immediately after the new legislation is passed.

This document is only a compilation of several efficient measures, which means that this strategic approach can be expanded according to the needs and trends of the social and political context in which we are living. The essence is the necessity of a comprehensive approach to the issue and a balanced pressure so that the solutions could be made systematically and thoroughly, and not symptomatically, reactively and partially. Only this way can we begin creating a healthy and safe environment for the children and youth in Bosnia and Herzegovina.

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Centar za
edukaciju
mladih

IOGT·NTO
MOVEMENT

Center for Youth Education
Bosanska 131 | +387 30 511 585 | cem.ba

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