

## **Response to the Greater London Authority's draft London Food Strategy**

### **About the Institute of Alcohol Studies**

The Institute of Alcohol Studies is an independent institute bringing together evidence, policy and practice from home and abroad to promote an informed debate on alcohol's impact on society. Our purpose is to advance the use of the best available evidence in public policy decisions on alcohol. For more information please visit [www.ias.org.uk](http://www.ias.org.uk).

### **Consultation response**

IAS welcomes the draft strategy which aims to improve public health outcomes and reduce exposure of children and young people from marketing practices which lead to unhealthy behaviours. However, the omission of alcohol marketing practices can be seen as a cause for concern, given the strong evidence from home and abroad that indicates exposure to alcohol advertising adversely impacts children. To this end, we see in this draft strategy a unique opportunity to add alcohol to the mayor's proposals.

To understand why banning the advertising of alcohol is important for the health of children and young people who use the transport network, we need to know why alcohol is as serious a problem as junk food and sugary soft drinks.

Alcohol consumption causes death and disability relatively early in life. According to the World Health Organisation, alcohol is the leading risk factor for ill-health, early mortality and disability among those aged 15 to 49 years, and approximately one in four deaths of 20 to 39-year-olds are attributable to alcohol.<sup>1</sup>

In Britain alone, national statistics on alcohol consumption show that adults aged between 16 and 24 years of age are most likely to binge drink, and regionally, London is the third worst performing region for the proportion of drinkers who binge drank in the last week.<sup>2</sup>

Furthermore, young people's exposure to and consumption of alcohol impacts negatively on their health. A comprehensive evidence review by Public Health England found that the strongest evidence for the impact of alcohol marketing in recent years comes from reviews of longitudinal and cohort studies of children, which consistently report that exposure to marketing increases the risk that children will start to drink alcohol, or if they already drink, will consume greater quantities.<sup>3</sup>

This runs alongside a number of studies demonstrating that the earlier a person drinks, the more likely they are to develop alcohol dependence or other alcohol-related problems in later life and that children who start drinking at younger ages tend to drink more in adulthood, and are more likely to drink to intoxication.<sup>4</sup>

Alcohol consumption in childhood and adolescence can lead to brain damage: A report published by Scottish Health Action on Alcohol Problems found evidence of the potential physiological damage of underage drinking on adolescents, suggesting that as their brains mature, alterations in chemistry caused by alcohol could risk creating ‘enduring deficits in control of emotion, logical thinking and inhibition of impulsivity’, which in turn could ‘exacerbate addictive tendencies.’<sup>5</sup>

It is because of such evidence that cities across the world are implementing alcohol marketing bans on transport networks. Alcohol advertising on buses is prohibited in Israel and the New York Metropolitan Transportation Authority banned advertising of alcoholic beverages on the city’s buses, subway cars and stations in 2017, ‘contending that the social benefits of deterring underage drinking outweighed the loss of revenue’. Most recently, the West Australian government has announced proposals to phase out alcohol advertising on its public transport network by March 2019.<sup>6</sup>



*Gin product advertisement on number 12 bus*

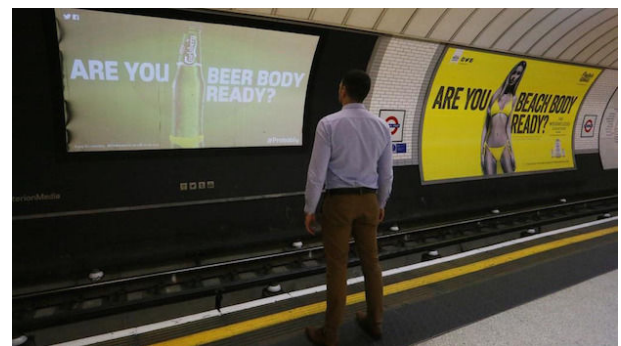


*Cider advert covers the walkways at Oxford Circus*

As detailed in the draft strategy, the Mayor of London’s proposals would represent ‘the largest intervention of its type in any city in the world, and would transform the exposure that children and young people have to unhealthy food advertising and associated brands on their journeys to school and within their local communities.’ However, the current proposals as they stand would leave children and young people exposed to alcohol adverts, which are littered across the TfL network, on the various routes they travel between home and school, university, or work (see illustrated).

In choosing to exclude alcohol from the plan, the comprehensive coverage promised by the ban leaves an obvious blind spot.

All these factors would suggest that a ban on alcohol marketing would have a positive impact upon the health of children and young people using the London transport network.



*Cross track projection advert for beer product*

IAS believes that a truly complete ban of advertising of unhealthy food and drink on the London transport network must include alcohol. In doing so, Transport for London would be making good use of a strong evidence base in seizing its unique opportunity to protect its users from exposure to health harms on its transport network.

**For more information please contact:**

Katherine Brown  
Chief Executive  
Institute of Alcohol Studies  
Alliance House, 12 Caxton Street, London, SW1H 0QS

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<sup>1</sup> World Health Organisation. 2018. [Alcohol](#).

<sup>2</sup> Official National Statistics. 2018. [Adult drinking habits in Great Britain: 2017](#). Tables.

<sup>3</sup> Public Health England. 2016. [The public health burden of alcohol: evidence review](#).

<sup>4</sup> Sir Liam Donaldson, Chief Medical Officer. 2009. [Guidance on the Consumption of Alcohol by Children and Young People](#). London: Department of Health.

<sup>5</sup> Scottish Health Action on Alcohol Problems. 2014. [Alcohol and the Developing Adolescent Brain: Evidence Review](#).

<sup>6</sup> Ynetnews. 2012. [Alcohol advertising on billboards, buses banned](#); New York Times. 2017. [M.T.A. Will Ban Alcohol Advertising on Buses and Subways](#); Australian Associated Press. 2018. [WA to ban alcohol ads on public transport](#).