



IOGT International submission

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[SDGs Indicators:](#)
[Open Consultation on Proposals received for the 2020](#)
[Comprehensive Review](#)

IOGT International welcomes the opportunity to contribute our expertise to the process of comprehensively reviewing the sustainable development goals indicators.

SDG 3.5.2 Indicator

IOGT International strongly opposes the proposal to replace the current indicator 3.5.2 on alcohol per capita consumption within a year with the new proposal of heavy episodic alcohol intake.

There is strong and growing evidence of effective population approaches that show that a reduction in per capita alcohol consumption (APC) will reduce both health and social problems caused by alcohol. Moreover many countries and WHO already measure APC.

On several occasions the rationale and technical justification has been confirmed for keeping per capita alcohol consumption as the most relevant single indicator reflecting the magnitude of alcohol harm in a given jurisdiction. This is evident from the indicator 3.5.2 being classified as tier I. There is no need to replace it all.

Of course, this indicator can be COMPLEMENTED (NOT REPLACED) by other indicators as done in the NCD global monitoring framework. IOGT International would support this, on the condition that the APC indicator remains.

However, as premier global network for alcohol prevention and control that has engaged in the consultation processes leading to the adoption of the SDGs and their indicators, we are acutely aware of the fact that in the SDG framework there was only the option to have ONE alcohol-related indicator, NOT SEVERAL. This restriction has not changed, as far as we are informed.



Therefore, with regard to indicator 3.5.2 the language agreed in the intergovernmental process on NCDs was used.

We support and welcome simplification of the language of APC indicator, as proposed by a member state. We would consider this simplification an improvement.

However, we reject the proposal to replace the current indicator with a new indicator of “age-standardized prevalence of heavy episodic drinking”.

This proposal runs contrary to WHO recommendations, and WHO is the custodian agency of the SDG 3.5.2 indicator. It also goes against established practice in reporting by member states on progress towards SDG 3.5. The VNR processes at the High-Level Political Forum on Sustainable Development since 2016 have clearly showed that countries report on indicator 3.5.2 APC.

IOGT International rejects the proposal to replace indicator 3.5.2 APC because it has obvious policy implications and is not merely an issue of data collection and statistics. Alcohol is a major obstacle to sustainable development, adversely affecting 13 of 17 SDGs and all three dimensions of sustainable development. The total per capita consumption in a population remains the single most effective indicator for whether governments are on track or not to achieve the SDGs including SDG3 and SDG 3.5.

While heavy episodic alcohol intake is a serious public health and sustainable development concern, it is not sufficient to capture all aspects of alcohol harm - that are not only related to patterns of consumption.

There are also substantive technical issues with the newly proposed indicator, that the current 3.5.2 indicator on APC does NOT have. Data on APC as total (recorded and unrecorded) per capita (15+) consumption in liters of pure alcohol for a calendar year is available for 192 WHO Member States and based on national sales and export/import data, data available from alcohol industry sources and FAO as well as the estimates of unrecorded alcohol consumption.

General Comment

The indicator 3.5.2 is classified as tier I indicator and is as such well-proven, both in WHO's own data collection processes and the WHO Global Alcohol Status



report, as well as in the Voluntary National Reviews in the ministerial segments of the High-Level Political Forum on Sustainable Development since 2016. There is absolutely NO NEED to REPLACE this well established indicator. The process of improving, refining, adding or replacing indicators should also be protected and remain free from corporate interference and obvious conflicts of interest.