

Ms Stella Kyriakides  
Commissioner for Health and Food Safety  
European Commission

Cc: - Giorgos Rossides  
- [REDACTED]  
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- Sandra Gallina  
- John F. Ryan

Brussels, 27 January 2021

**Object: Forthcoming release of Commission Communication Europe's Beating Cancer Plan**

Dear Commissioner Kyriakides,

By way of introduction, Comité Européen des Entreprises Vins (CEEV – [www.ceev.eu](http://www.ceev.eu)), represents the European wine and aromatized wine companies. Our members produce and market the vast majority of quality European wines with and without geographical indications.

I am writing to you in respect of the forthcoming adoption and publication of Commission Communication “Europe's beating cancer plan” (EBCP). We wish to inform you of our general support and to identify some concerns.

**First of all, I wish to confirm CEEV's support toward this important initiative and welcome the Commission's approach to involve non-state actors in the development of the plan – CEEV contributed to both EC public consultations.**

**We understand that some recommendations and future actions of the EBCP will focus on the reduction of the harmful use of alcohol and we wanted to underline CEEV's support of this objective over the last 12 years with the Wine In Moderation Program.**

**However, I also want to identify some concerns, ahead of the release of Commission Communication.** Some of these relate to what believe may be a former version of the draft Communication that has been circulated in Brussels after its publication in a Brussels' bubble journal.

**Firstly, I want to identify an error in the data included in the draft Communication circulated.** Citing the reference document - “Assessment of the added value of the EU strategy to support Member States in reducing alcohol-related harm” (table 53 on page 190), the draft concludes that “*Alcohol-related harm [...] accounts for over 15% of cancer attributable deaths in men and 30% in women*”. However, the reference document and table indicate that “cancer accounts for 15.9% of alcohol attributable deaths in men and 30.7% in women” resulting in a completely different conclusion.

In addition, we want to express a firm belief that policy recommendations should be based on updated and completed data. However, **the cited reference document reports data from 2004!**  
For a completely accurate base, data relating to the UK should be excluded.

Secondly, we are concerned that the actions should be focused on reducing the harmful use of alcohol, versus reducing consumption of alcoholic beverages *per se*, as some of the proposals and recommendations included in the draft Communication seem to do (i-e.: stopping promotion programmes or reducing online marketing and advertising).

While there is clear evidence that regular heavy, excessive consumption of alcoholic beverages and binge-drinking patterns are associated with increased morbidity and mortality from certain types of cancers and that excessive drinkers have a high risk of developing several types of cancer, the data behind the “no safe level” concept, when speaking about alcohol consumption and cancer risk, is incomplete.

Cancer is a multi factorial disease and risk cannot be evaluated in isolation, it must be assessed in the context of cultural, drinking, eating and lifestyle patterns.

**Concretely, scientific evidence indicates that drinking wine moderately, as part of a Mediterranean-style diet, in conjunction with the practice of other healthy lifestyle factors, does not increase the risk of cancer.**

We are extremely pleased to share with you the attached factsheet “*Wine consumption in the context of a healthy lifestyle and cancer risk*” which provides a summary of the scientific document ‘Wine consumption in the context of a healthy lifestyle and cancer risk’ prepared by the Wine Information Council<sup>1</sup> and which compiles and assess scientific research which has been carried out over the past twenty years concerning the relationship between wine consumption in the context of a healthy lifestyle and cancer risk.

**We do believe that in light of the elements presented, the EBCP actions should focus on addressing harmful use of alcohol while acknowledging the scientific fact that drinking wine in moderation, with a meal, as part of healthy lifestyles and dietary patterns, in particular the Mediterranean diet, does not increase cancer risk.**

Moreover, I take the opportunity to affirm that the wine sector is strongly committed to continue its action through the Wine in Moderation ([www.wineinmoderation.eu](http://www.wineinmoderation.eu)) movement to promote responsible wine consumption and contribute to reduce the harm related to excessive/irresponsible drinking. The mission to self-regulate commercial communication, to educate, inform and communicate on the topic of moderate and responsible wine drinking as part of a healthy diet and lifestyle is achieved through a variety of actions at local and international level targeting wine professionals as well as consumers.

Dear Commissioner Kyriakides, let me once again confirm our willingness and strong commitment to continue proactively contributing to the reduction of the harmful use of alcohol, and focusing on prevention actions in order to achieve the overall objective of Europe’s Beating Cancer Plan and fight the cancer disease.

We remain at your disposal and we will very much appreciate the opportunity to discuss this further via video call.

Sincerely yours,

<sup>1</sup> [https://www.wineinformationcouncil.eu/index.php?option=com\\_k2&view=item&id=3163:wine-consumption-in-the-context-of-a-healthy-lifestyle-and-cancer-risk&Itemid=640](https://www.wineinformationcouncil.eu/index.php?option=com_k2&view=item&id=3163:wine-consumption-in-the-context-of-a-healthy-lifestyle-and-cancer-risk&Itemid=640)