

## National Alcohol Policy: Feedback and Recommendations

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Chief Executive's Message

This document contains the foundation's feedback and recommendation on the

proposed National Alcohol Policy (2025).

These recommendations are based on the focus groups made up of the foundation's

professionals who work in the field of addiction prevention and recovery. Their

contribution is a combination of current research as well as years of experience of

working in the field.

We are cognisant that some of the feedback and recommendations are too drastic for

the current societal frame of mind and beliefs. Notwithstanding this reality, we feel

the need to propose these ideas which are based on the current devastating realities,

caused by alcohol and other drugs, in the hope of continued social improvement.

We understand that some of these recommendations may cause fury in some of the

Maltese social cohorts and others may try to mock the rationale behind such

proposals. However, some countries have already implemented them.

Notwithstanding this, we feel that as professionals, it is our moral obligation - which

far outweighs any desire to be liked - to state what needs to be stated, based on

research and experience.

Mr. Noel Xerri

Chief Executive of the OASI Foundation

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#### Introduction

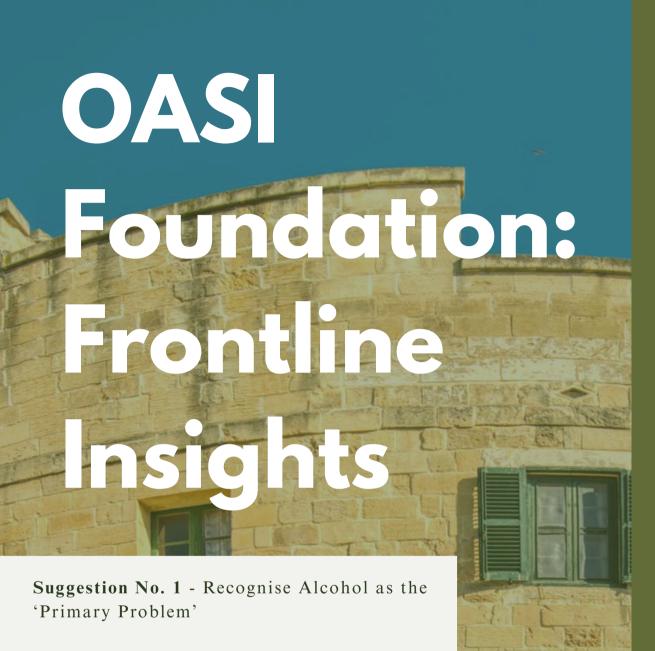
Alcohol consumption in Malta remains a pressing public health concern. In 2019, Malta was flagged by the World Health Organisation (WHO) for recording the highest level of alcohol consumption per capita in Europe. Moreover, research shows that adolescents in Malta report greater access to alcohol compared to their European counterparts (Azzopardi et al., 2021). Alarmingly, alcohol is also identified as the second most misused substance among adolescent psychiatric inpatients in Malta, after nicotine (Grech & Axiak, 2015).

The OASI Foundation has always believed that alcohol is a toxic and addictive substance, that needs specific attention and treatment, like any other addictive substance.

With over 30 years of experience working at the forefront of education, prevention, treatment, and rehabilitation, OASI Foundation is committed to contributing meaningfully to the national conversation surrounding alcohol use. Hence, the OASI Foundation welcomes the publication of the National Alcohol Policy (2025).

Despite ongoing improvements in public education and awareness initiatives, critical shortcomings remain in the areas of enforcement and prevention. Drawing from international best practices and our extensive experience supporting affected individuals and families across Malta and Gozo, this document presents a set of evidence-based recommendations to support the successful implementation of the National Alcohol Policy (2025).





Suggestion No. 2 - Recognising and Addressing Families' Needs in Policy Development

Suggestion No. 3 – Require Establishments Serving Alcohol and Other Substances, to Attend Training Seminars on Substance Abuse Every Three Years (similar to first aid certification).

Suggestion No. 4 - Creating Consistency in Underage Drinking Prevention

## OASI Foundation: Frontline Insights

Suggestion No. 1 - Recognise Alcohol as the 'Primary Problem'

Although the majority of our beneficiaries seek our services due to cocaine related problems, we invariably find that cocaine use is being triggered by alcohol use. This pattern suggests that if alcohol use were effectively addressed, many clients would be less likely to escalate to other substances.

Given this, it is of imperative importance to re-examine how alcohol is conceptualised within Maltese society and culture, and to implement corresponding changes in public policy and national legislation. Without a fundamental shift in societal attitudes and legal frameworks around alcohol, meaningful and lasting change in substance use trends will remain out of reach.

Furthermore, the culture of alcohol use is so deeply embedded in Maltese social life that excessive drinking is often dismissed as harmless fun. This cultural blind spot not only fuels denial and minimisation around harmful drinking patterns, but also makes it significantly harder for individuals to recognise when their use has become problematic or to seek help without stigma. Addressing this normalisation is crucial if prevention and treatment efforts are to be truly effective.

## <u>Suggestion No. 2 - Recognising and Addressing Families' Needs in Policy</u> <u>Development</u>

We have listened to many helpless family members over our 34 years of supporting those affected by addiction. Time and time again, families have questioned the lack of institutional support when they reach out for intervention, often feeling judged rather than helped. Instead of being met with compassion and guidance, many report feeling stigmatised, as though the family itself is to blame.

Many families have also expressed deep concern over national events aimed at attracting the public such as; wine festivals, beer festivals, and similar celebrations that glamorise alcohol use while ignoring its serious social and health consequences. Some families have voiced distress when they see these events widely promoted and even endorsed by public institutions, while their own pleas for help go unanswered. They ask: How can society celebrate the very substance that is tearing our families apart?

This contradiction between public celebration and private suffering highlights the urgent need for a more balanced, compassionate, and family-centred national approach to alcohol policy.

<u>Suggestion No. 3 – Require Establishments Serving Alcohol and Other Substances, to Attend Training Seminars on Substance Abuse Every Three Years (similar to first aid certification).</u>

Families have expressed frustration over the lack of enforcement in bars, where alcohol is often served to individuals who are clearly struggling with addiction. Implementing mandatory training for employees in licensed establishments could play a key role in addressing this issue. With proper training, servers would be better equipped to recognise signs of alcohol dependency and respond appropriately.

In many cases, individuals with alcohol addiction frequent the same bar, making it easier for employees to observe unhealthy patterns of behavior. Over time, a rapport often forms between the individual and the server, creating a unique opportunity for early intervention. Trained staff may be able to encourage healthier choices, provide non-judgmental support, and potentially guide individuals toward seeking help.

Such training is to be provided by accredited agencies such as the OASI Foundation.

#### Suggestion No. 4 - Creating Consistency in Underage Drinking Prevention

During educational sessions held across Gozo's primary and secondary schools, students consistently express confusion, frustration, and mistrust regarding the contradictory messages they receive about underage drinking. These concerns reflect a deeper systemic issue where national laws, real-world enforcement, and social norms are misaligned, leaving young people without a clear, consistent message.

Some of the most common questions we hear from students include:

"Why is this legal when it is clearly very dangerous?"

"But if it is legal, I can drink and it's not supposed to cause any harm."

"This does not make sense."

"Are they doing this for money? Is that how much our life is worth?"

More than safeguarding, the law also provides direction. These questions reveal a critical misunderstanding that **legality equates to safety** - an assumption that could have long-term consequences on young people's choices and health. At this formative stage, students are more than capable of developing strong opinions. What we fear, however, is that their current conceptualisation of substances may fade over time as they become more exposed to societal norms where underage drinking and even experimenting with other harmful substances - is widely tolerated, normalised and encouraged.

Instead of reinforcing this confusion, schools should be leading the effort in sending a clear, consistent, and evidence-based message about the dangers of underage substance use. This message should align with the core values and educational objectives of organisations such as the OASI Foundation, which are grounded in the promotion of healthy, substance-free lifestyles.

We strongly believe that the education system must serve as a pillar of prevention, not confusion. To protect our young people, we must prioritise coordinated messaging, clear policies, and accountability - both within our schools and in society at large.

# Enforcement: The Cornerstone of Real Impact

Suggestion No. 5 - Raising the Legal Drinking Age to 21

Suggestion No. 6 - Mandatory Alcohol Testing in Domestic Violence and Peace-Breaking Incidents

**Suggestion No. 7** – Implement Comprehensive Alcohol Pricing Policies

Suggestion No. 8 - Strengthen Enforcement of Alcohol Sale Hours

Suggestion No. 9 – Implementing the PAVE Project

Suggestion No. 10 - Alcohol-Free Zones: Safeguarding Minors, Youth and Community Wellbeing

Suggestion No. 11 - Revise Legal Frameworks

## Enforcement: The Cornerstone of Real Impact

<u>Suggestion No. 5 – Raising the Legal Drinking Age to 21</u>

Adolescence is a formative period marked by rapid development across multiple domains namely; physical, cognitive, emotional, and social. Neurological research highlights that during this stage, adolescents exhibit increased reward sensitivity, greater impulsivity, and a reduced capacity for self-regulation (Azzopardi et al., 2021; Casey, 2015; Romer et al., 2017). These factors contribute to a higher likelihood of engaging in risky behaviors, including the early initiation and escalation of alcohol use.

The adolescent brain is especially susceptible to the harmful effects of alcohol. Critical regions involved in decision-making, impulse control, and emotional regulation continue to mature into the mid-20s (WHO, 2024). Like any other drug, early alcohol consumption can interfere with this developmental process, increasing the risk of long-term cognitive impairments and addiction (Spear, 2016).

Emerging evidence from both human and animal studies further supports these concerns. Adolescent alcohol use is associated with poorer performance in memory, attention, executive functioning, and emotional regulation tasks. Neuroimaging studies reveal accelerated grey matter reduction, disrupted white matter growth, and abnormal brain activity patterns in adolescent drinkers compared to non-drinking peers. Pre-clinical studies also suggest long-lasting neurological changes, including increased sensitivity to alcohol's rewarding effects and impaired brain cell regeneration, potentially driven by alcohol-induced inflammation (Lees et al., 2020).

Malta's current legal drinking age of 17 does not reflect the biological or psychological developmental maturity. Raising the legal drinking age to 21 would not only offer greater protection during this critical developmental window but also send a strong public health message. Such a policy shift would bring Malta in line with international best practices, as seen in countries like the United States, where a higher legal drinking age has been linked to reduced alcohol-related harm among young people.

#### Suggestion No. 6 - Mandatory Alcohol Testing in Domestic Violence and Peace-Breaking Incidents

In 2024, domestic violence ranked as the fourth most reported criminal offense in Malta, accounting for 13.4% of all reported cases, with 2,225 incidents; a notable increase from 2,071 cases in 2023. Over the ten-year period from 2014 to 2024, domestic violence reports rose by 112% (an increase of 1,177 cases), underscoring the growing vulnerability of victims. While the overall number of cases increased by 7% between 2022 and 2023, this growth was largely driven by a rise in psychological harm, which alone increased by 180 cases (12%) during that period. In fact, psychological harm accounted for 78% of all domestic violence cases in 2024. Other sub-categories, including certain forms of physical violence, either declined or remained stable, with the exception of grievous bodily harm involving physical force, which also saw an uptick. These figures suggest a shift in how domestic violence manifests, with emotional and psychological abuse becoming increasingly prevalent (Formosa & Formosa Pace, 2025).

However, the rising number of domestic violence cases reported in recent years, many involving alcohol or substance misuse - suggests that the true extent of the issue may be underreported. News reports and observations from practitioners reveal a consistent pattern of alcohol-fueled aggression escalating into violence, particularly within domestic settings.

We note that alcohol is being consumed with other mood altering substances, making the effect worse. In response, we strongly recommend the introduction of mandatory testing of alcohol and other substances for all individuals involved in domestic violence and peace-disturbance incidents. Testing should be conducted immediately upon officials' arrival at the scene, rather than delayed until arrest or subsequent processing.

Timely testing is essential to:

- Accurately assess the role of alcohol and other substances at the time of the incident
- Inform risk assessments and safety planning for victims.
- Provide reliable evidence for appropriate legal and social interventions.
- Enable immediate referral to addiction treatment or rehabilitation services when needed.

Implementing this measure would enhance perpetrator accountability, improve case documentation, and facilitate earlier and more effective intervention and support for both victims and individuals with substance use issues. This is not only a legal concern but a broader matter of public health and community wellbeing.

We also propose that this measure be extended to repeat drink-driving offenders, peace disturbance cases, and alcohol-fueled public incidents. Alcohol levels decline rapidly after consumption, and unless testing is performed on the spot, results may no longer accurately reflect the individual's level of intoxication at the time of the offence. Consequently, alcohol-related violence and disturbances risk being overlooked, misrepresented, or under-prosecuted due to unreliable evidence resulting in missed opportunities for meaningful intervention.

#### <u>Suggestion No. 7 – Implement Comprehensive Alcohol Pricing Policies</u>

Evidence demonstrates that higher alcohol prices are among the most effective strategies for reducing consumption and preventing alcohol-related harm, with particularly strong effects among high-risk groups such as heavy drinkers, adolescents, and young adults (Xu & Chaloupka, 2011).

MUP ensures that no alcoholic beverage is sold below a health-protective threshold, targeting the cheapest and strongest products most associated with harmful drinking patterns. At the same time, increased taxation aligns alcohol prices with their true economic, health, and social costs, providing additional revenue to support prevention, treatment, and enforcement measures.

Without the adoption of these pricing policies, rising alcohol consumption will continue to place additional strain on rehabilitation programmes, emergency and hospital services, and law enforcement. By implementing comprehensive alcohol pricing measures, Malta can significantly reduce harmful drinking, promote healthier communities, and alleviate the long-term social and economic burdens associated with alcohol misuse.

#### Suggestion No. 8 – Strengthen Enforcement of Alcohol Sale Hours

Although current Maltese legislation already prohibits the sale of alcohol in certain outlets (e.g., confectioneries) after 9 PM with fines reaching up to €20,000 and the possibility of licence revocation under Act XIII of 2011 - enforcement remains inconsistent (Government of Malta, 2011).

In official reports and observations indicate that many outlets continue to operate in breach of these restrictions without consequence, although we applaud the recent action by the Malta Police Force, where 5 shops were caught in breach of the law and action was taken accordingly (Times of Malta, 2025).

We suggest improving enforcement mechanisms by allocating specific resources within the Malta Police Force and Commerce Department to monitor and inspect high-risk areas, particularly in entertainment zones and village cores.

#### Suggestion No. 9 – Implementing the PAVE Project

The PAVE Project - an acronym for Protect, Ask, Verify, Educate, is a national awareness and prevention initiative originally launched by Caritas Malta, and officially endorsed by Sedqa and the OASI Foundation. The initiative is designed to reduce and prevent the sale and use of alcohol, tobacco, vaping products, and cannabis among minors under the legal age (17 for alcohol; 18 for tobacco and cannabis). The PAVE Project combines community education, public reporting, and enforcement through the support of community policing and youth outreach. Its multi-stakeholder collaboration also includes Agenzija Żgħażagħ, local councils, schools, and parents. The project reflects a proactive and united approach to safeguarding adolescents from early substance exposure and fostering a culture of shared responsibility and prevention.

We firmly believe that this initiative should be implemented without delay. Hence, we are strongly recommending both the implementation and dedicated funding of the PAVE Project. In fact, our suggestions align closely with the goals and strategies already outlined within this well-structured, collaborative project that is ready for immediate rollout. The PAVE Project offers a comprehensive framework for prevention, education, community engagement, and enforcement, and represents a proactive step toward addressing underage substance use in Malta. Its multi-tiered strategies and cross-sector partnerships make it an ideal vehicle for real, long-term impact.

#### Such strategies include:

- Establish a centralised reporting system for the public to report illicit alcohol sales, with guaranteed follow-up.
- Conduct regular compliance checks in collaboration with local councils, particularly during weekends and festivals.
- Introduce graduated penalties for repeat offenders to ensure deterrence:
- Consider revising the permitted sale hours, with earlier cut-off times in high-density or nightlife-heavy areas (e.g., no alcohol sales after 7 PM in retail outlets in designated zones).

• Enhance public awareness through visible signage in shops and public campaigns on the legal timeframes and consequences of breaching them.

## Suggestion No. 10 - Alcohol-Free Zones: Safeguarding Minors, Youth and Community Wellbeing

We have had numerous reports where adults responsible for minors were drinking alcohol in their presence. We have had parents complaining and mentioning that coaches were drinking alcohol while touring abroad for tournaments with teenagers. Selling alcohol in venues frequented by minors (e.g., sports clubs, band clubs, scout halls, etc.) promotes early exposure and onset.

Based on both international research and our direct fieldwork experience, we strongly recommend that specific settings - particularly those involving children, youth, vulnerable individuals, or recovery communities, be designated as alcohol-free zones. Such environments include, but are not limited to, schools, youth centres, sports facilities, healthcare and social service settings, and public events aimed at families.

Maintaining alcohol-free spaces not only protects individuals from exposure and potential harm, but also reinforces healthier social norms, reduces triggers for those in recovery, and supports prevention efforts. Our experience has shown that the presence of alcohol in such settings often undermines the goals of inclusion, safety, and wellbeing. Establishing alcohol-free zones is therefore a proactive and evidence-based approach to fostering healthier and more supportive environments.

#### Suggestion No. 11 – Revise Legal Frameworks

Update Article 338(ff) of Chapter 9 to reflect current realities, closing loopholes where drunkenness in public is not being acted upon (Malta: Criminal Code, §338 ff., 1854).

#### Article in reference:

"in any public place or place open to the public, is found drunk and incapable of taking care of himself; or in any public place or place open to the public, being in charge of a child under the age of seven years, or of any horse, mule or ox, or steam engine, or of any vehicle, is manifestly in a state of intoxication, or, being in such a state, causes any annoyance or disturbance, or is in possession of firearms, or refuses to quit any wine and spirit shop, inn, tavern or lodging-house, or attempts to enter any passenger boat or vessel or other vehicle, or refuses to quit such boat, vessel or other vehicle notwithstanding the warning of the person in charge thereof not to enter into or to quit such boat, vessel or other vehicle;"

## Tighten Road Safety

**Suggestion No. 12** – Mandatory and Random Breathalyser Tests

Suggestion No. 13 - Ban Alcohol Promotion During Celebrations Involving Moving Vehicles

**Suggestion No. 14** - Additional Safeguarding when Minors are Present During Celebrations Involving Moving Vehicles

Suggestion No. 15 - No Alcohol or Alcohol-Related Products are to be Allowed in the Driving or Seating Compartments of any Vehicle

Suggestion No. 16 - License Revocation for Repeat Offenders

#### **Tighten Road Safety**

In recent years, there has been growing concern about the prevalence of alcohol use among young drivers and its contribution to road traffic accidents and broader social challenges. Locally, where the legal driving age is as low as 18, adolescents are entrusted with significant responsibility at a stage when their brains are still developing. They are particularly susceptible to driving under the influence of alcohol and experiencing social difficulties, largely due to neurobiological immaturity; specifically, the underdevelopment of the limbic system and prefrontal cortex, which are responsible for emotion regulation, impulse control, and decision-making (Arain et al., 2013). This developmental stage heightens vulnerability to risk-taking behavior, especially in the context of peer influence and alcohol accessibility.

As a result, we suggest the following preventive and policy measures:

#### Suggestion No. 12 – Mandatory and Random Breathalyser Tests

As of the 1st of January 2024 and the 30th of June 2025, a total of 280 breathalyser tests were conducted, of which 157 drivers - representing approximately 56% - tested positive for blood alcohol levels exceeding the legal limit (Camilleri, 2025; Malta Daily, 2025). These figures are deeply concerning and highlight a persistent issue that cannot be effectively addressed through sporadic, suspicion-based testing alone. Currently, police officers may carry out breathalyser tests on site if they suspect that a driver is under the influence of alcohol. However, the high percentage of positive results suggests that more systematic measures are necessary to curb drink-driving.

This information was announced by the Minister for Home Affairs, Security, and Employment, Byron Camilleri, in response to a Parliamentary question raised by MP Ivan Bartolo (Cammileri, 2025; Malta Daily, 2025). The data underscores the urgent need for a stronger and more consistent approach to enforcement.

#### As a result, it is proposed that:

- Breathalyser tests become mandatory at the scene of all traffic accidents and during routine traffic stops.
- These tests should be administered immediately on site, provided the driver is physically capable of completing the procedure.
- In cases where the driver is incapacitated or otherwise unable to provide a breath sample, a blood test shall be conducted as an alternative.
- By implementing mandatory testing as a standard practice, we can significantly enhance deterrence, ensure more effective enforcement, and ultimately protect lives on our roads.
- The law is changed to empower police officers to carry out breathalyser tests as random, rather than on suspicion.

## <u>Suggestion No. 13 – Ban Alcohol Promotion During Celebrations Involving</u> <u>Moving Vehicles</u>

The advertisement and visible consumption of alcohol during celebrations particularly on moving celebratory floats presents significant public health and safety concerns. These events often occur in public spaces and are highly visible to the community, including minors who frequently participate or are present on such floats.

To safeguard young people and promote responsible messaging, the display, promotion, or consumption of alcohol on moving celebration floats should be strictly prohibited. This includes banning alcohol branding, consumption or advertising during the celebrations.

#### Suggestion No. 14 - Additional Safeguarding when Minors are Present During Celebrations Involving Moving Vehicles

In cases where minors are present on a float where alcohol is being consumed or promoted, the responsible owner/ entity should be held accountable. Reasonable fines should be imposed to enforce compliance and deter future violations.

This measure supports the creation of safer, healthier celebratory environments and reinforces the broader cultural shift toward reducing youth exposure to alcohol-related behaviors.

## Suggestion No. 15 – No Alcohol or Alcohol-Related Products are to be Allowed in the Driving or Seating Compartments of any Vehicle

Alcohol related products must be stored securely in the car boot to ensure that neither the driver nor the passengers are consuming alcohol or posing a distraction that could endanger road safety.

This measure aims to reduce alcohol-related traffic incidents and promote responsible behaviour among all road users.

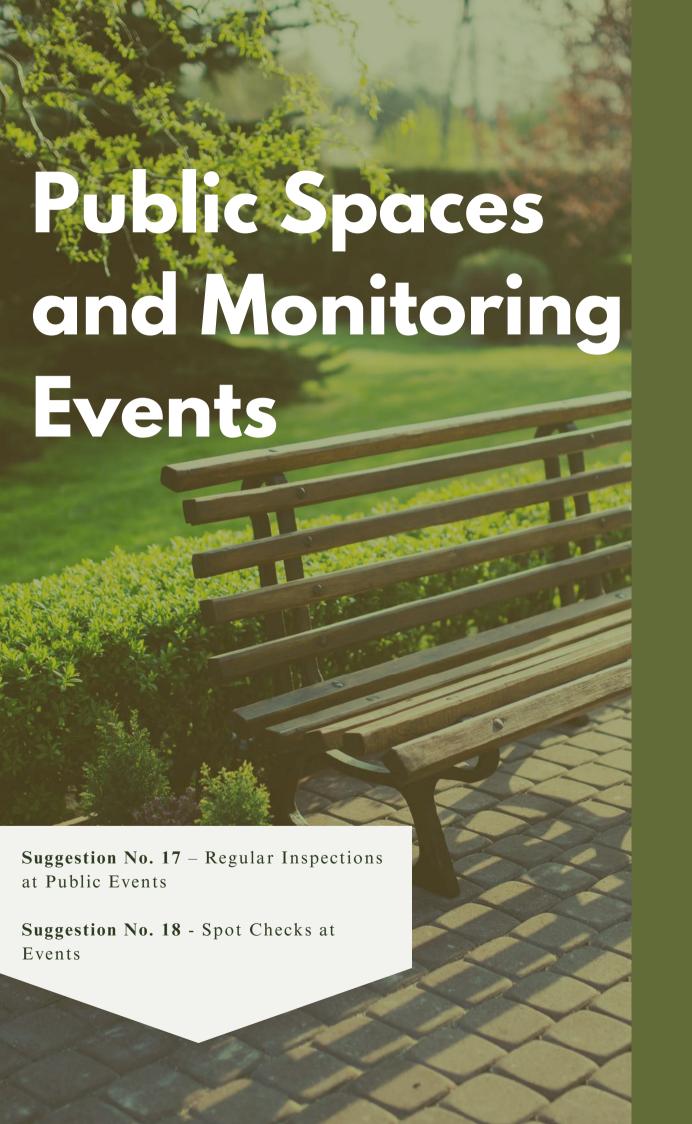
- Violation of this regulation, even without evidence of consumption, will result in a fixed fine.
- If a breathalyser test confirms alcohol consumption, the driver will face a significant deduction in license points and a higher-tier fine, depending on the level of alcohol detected.

In cases where minors are present in the vehicle, the incident will be treated as an aggravated offence. Additional consequences may include:

- · Heavier fines.
- Immediate suspension of driving licence.
- Referral to child protection services.
- Mandatory attendance at alcohol misuse education and/or rehabilitation sessions.

#### Suggestion No. 16 - License Revocation for Repeat Offenders

Establish protocols for license suspensions after a defined number of drink-driving offences or alcohol-related traffic infractions. If such drivers fail to adhere to better their relationship with alcohol and continue to disregard the safety of themselves and others, mandatory treatment on alcohol misuse is provided on a mandatory basis for a duration that is deemed necessary for the person based on their biopsychosocial needs.



#### Public Space and Monitoring Events

Suggestion No. 17 – Regular Inspections at Public Events

#### We suggest the following:

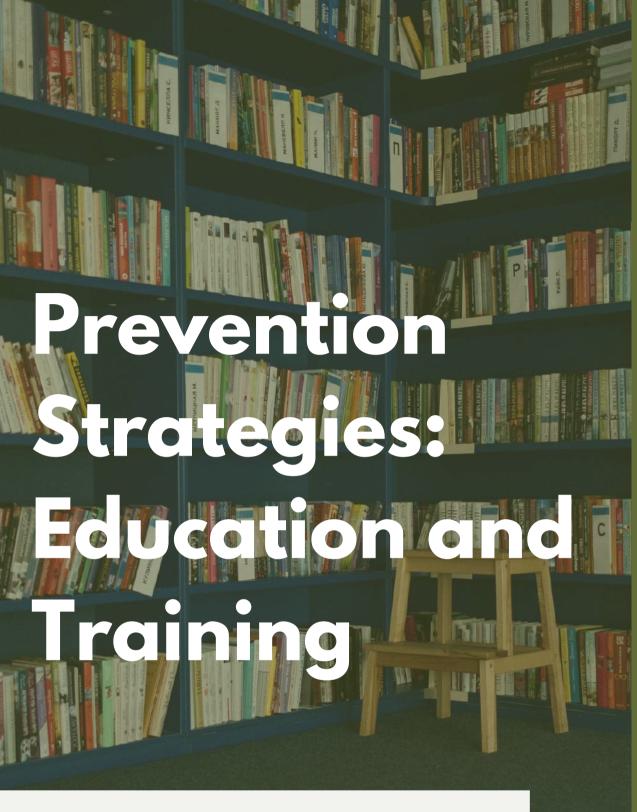
- Conduct unannounced checks in bars, restaurants, and clubs by the local community police.
- Random ID verification of patrons.
- Authorities should actively monitor child-populated areas such as schools, extracurricular activity sites, youth centres, playgrounds, and public gardens, where substances including nitrous oxide (N2O), (laughing gas) cylinders, empty alcohol bottles, and other drug-related paraphernalia are increasingly being found. This concern is reinforced by findings highlighted in our press release on the Nitrous Oxide (N2O), issue dated 15th May 2025, which underscores the growing presence of such substances in spaces intended for children and adolescents (OASI Foundation, 2025).

#### Suggestion No. 18 - Spot Checks at Events

Establish a legal requirement for random spot checks at private and public events. Establishment owners, event organisers, and security personnel shall be held accountable if minors are found consuming alcohol on the premises or are permitted entry into venues with age restrictions.

Law enforcement officials shall have the authority to conduct on-site inspections during events and request identification from attendees. Failure to present valid identification will result in administrative penalties imposed on the establishment owner, event organiser, and the contracted security company. These measures aim to strengthen accountability and safeguard minors from exposure to alcohol-related harm and the exposure to alcogenic environments to minors.

Failure to adhere to such policy after 3 checks, such license will be revoked for a period of time deemed fit.



**Suggestion No. 19** - Incorporate Professional Agencies into Policy Drafting Committees, Training Providers, and School Curricula Contributors.

**Suggestion No. 20** – Mandatory Alcohol (and Addiction) Education in PSCD Curriculum

**Suggestion No. 21** – Train All Frontline Personnel to Identify and Respond to Alcohol-Related Situations

## Prevention Strategies: Education and Training

<u>Suggestion No. 19 - Incorporate Professional Agencies into Policy Drafting Committees, Training Providers, and School Curricula Contributors.</u>

Taking a bottom-up approach is the best way to implement and draft realistic and effective policies. Involving professional agencies ensures that policies are informed by on-the-ground expertise and practical experience, rather than being solely top-down directives. This collaborative method allows for the identification of real challenges faced by communities, while also increasing stakeholder ownership and long-term sustainability of initiatives. By embedding professional agencies in drafting, training, and curriculum development, policies can better reflect lived realities and achieve greater impact.

#### <u>Suggestion No. 20 – Mandatory Alcohol (and Addiction) Education in PSCD</u> Curriculum

Implement age-appropriate, evidence-based alcohol and drug misuse education as part of the Personal, Social and Career Development (PSCD) syllabus across all schools. The OASI Foundation strongly believes that education and awareness on substance abuse and other addictive behaviors should be mandatory and part of the student's syllabus across the ages of primary and post-secondary education.

### <u>Suggestion No. 21 – Train All Frontline Personnel to Identify and Respond to Alcohol-Related Situations</u>

We recommend that all frontline personnel receive targeted training on how to recognise signs of intoxication, respond appropriately, and refer individuals or affected family members to the necessary support or treatment services.

This training should be standard for professionals who are likely to encounter alcoholrelated incidents in their work, including:

- · Teachers and school staff
- Hospital and emergency department personnel
- Police officers and community wardens
- Local council members and municipal workers
- Social workers and youth service providers

The goal is to equip frontline workers with the practical tools and knowledge needed to intervene safely and effectively, ensure the wellbeing of those affected, and promote early intervention. A coordinated and informed response across sectors can significantly reduce harm, improve outcomes, and support long-term recovery within the community.



Suggestion No. 23 - Change the Narrative

#### **Advertising and Messaging**

<u>Suggestion No. 22 – Ban Alcohol Advertising in Public Spaces and on Social</u> <u>Media</u>

Alcohol advertisements should be banned in both physical public spaces and digital platforms, similar to existing restrictions on tobacco advertising. This includes removing alcohol-related promotions from:

- Social media platforms
- · Billboards
- Bus stops
- Playgrounds
- Other public or youth-accessible areas

Authorities should follow the example of leading countries such as France and Norway, which have implemented strong advertising restrictions to reduce alcohol-related harm, especially among young people.

#### **Suggestion No. 23 - Change the Narrative**

Eliminate the term "responsible drinking" from national campaigns. It is misleading to attach the word "responsible" to any substance or behaviour that has addictive properties.

The WHO emphasises that alcohol consumption inherently carries health risks, underscoring the urgent need for measures that reduce the likelihood of illness and disease. The WHO (2023, para. 5) warns, "risks start from the first drop." This statement highlights that there is no safe threshold of alcohol consumption. Even minimal intake can contribute to long-term health consequences, including cardiovascular disease and liver damage.

Promoting "Responsible Alcohol Use" leads to minimising these dangers and may inadvertently encourage consumption under the false belief that it can be done without harm.

Public health messaging should shift towards clear, evidence-based communication that reflects the scientific consensus: alcohol is a toxic and addictive substance, and its risks accumulate from the very first drink.

Campaigns should therefore focus on reducing consumption, discouraging normalisation, and fostering environments where abstinence or minimisation is seen as the healthiest and safest choice as "the more you drink, the more harmful it is – or, in other words, the less you drink, the safer it is," explains Dr Carina Ferreira-Borges, acting Unit Lead for Noncommunicable Disease Management and Regional Advisor for Alcohol and Illicit Drugs in the WHO Regional Office for Europe (WHO, 2023, para. 8)



## Recommendations for Legislative Reform

<u>Suggestion No. 24 - Develop a Comprehensive Legal Framework Specific to Alcohol - Parallel to the Existing Laws for Controlled Substances</u>

There is a clear need to develop a comprehensive legal framework specific to alcohol; one that mirrors, in principle and scope, the regulatory structures already in place for controlled substances. While alcohol remains a legal and socially accepted substance, its significant public health impact, addictive potential, and social consequences warrant a more robust and targeted legal approach.

Such a framework should go beyond general licensing and enforcement regulations, and encompass the full spectrum of alcohol-related harms. This includes legislation addressing marketing and advertising restrictions (especially to minors), sales and availability controls, pricing and taxation mechanisms, labeling requirements with health warnings, and strict enforcement measures against violations. Furthermore, it should embed alcohol harm reduction and prevention strategies into national health and education policies.

Just as controlled substances are managed with a comprehensive, health-centered approach that includes prevention, treatment, and harm reduction, alcohol legislation should also integrate these components. This will help shift the policy focus from viewing alcohol solely as a commercial product to treating it as a substance with serious public health implications. A dedicated legal framework can ensure consistency across sectors, enhance accountability, and support a long-term cultural shift towards more responsible alcohol use.

#### <u>Suggestion No. 25 – Establish a National Database for Tracking Repeat Offenses</u> <u>and Treatment Compliance for Court-Mandated Rehabilitation</u>

Effective data collection is fundamental for monitoring and evaluating national drug and alcohol policies. The recent establishment of the National Focal Point on Alcohol is a welcome development. However, the OASI Foundation continues to advocate for alcohol to be addressed as a drug.

We strongly recommend that data on alcohol use be fully integrated into a broader substance use monitoring system. This would avoid siloed data sets and reflect the reality of poly-substance use. Moreover, most of the entities involved in collecting alcohol-related data are already collecting information on other substances, making this integration both practical and efficient.

We propose the creation of a centralised national database that tracks:

- Repeat offenses related to substance use;
- Compliance with court-mandated rehabilitation programs;
- Treatment outcomes across the public and private sector.

Data should be systematically collected from:

- Addiction rehabilitation centers (inpatient and outpatient);
- General and mental health hospitals (both public and private);
- Emergency departments (both public and private);
- Autopsy and mortuary services;
- Law enforcement and judicial entities; and
- Any other relevant agencies.

Such a database would enhance national capacity for evidence-based policymaking, resource allocation, and early identification of emerging trends in substance use and treatment adherence.



#### Conclusion

Malta has taken an important step forward in drafting the National Alcohol Policy (2025). However, for real, measurable change to occur, enforcement must be prioritised and resourced. Prevention, regulation, and education must work in synergy. OASI Foundation stands ready to collaborate with the government, schools, local councils, and civil society to make this policy a living, impactful framework.

Our aim with this report is to foster a more socially aware, better educated community, one that cultivates a healthier, more balanced relationship with alcohol.

We believe that, like a ripple effect, the implementation and serious enforcement of these recommendations will lead to a cultural shift: one where responsible attitudes toward alcohol are no longer reactive, but deeply rooted in awareness, prevention, and accountability.

This evolving mindset will, in turn, strengthen public support for such policies and encourage long-term behavioural change across generations.

#### References

- Arain, M., Haque, M., Johal, L., Mathur, P., Nel, W., Rais, A., Sandhu, R., & Sharma, S. (2013). Maturation of the adolescent brain. *Neuropsychiatric Disease and Treatment*, 9(9), 449–461. https://doi.org/10.2147/ndt.s39776
- Azzopardi, A., Clark, M., Formosa, O., Gellel, M., & Mangion, C. (2021). Substance use in adolescence and emerging adulthood: Trends, developments and transitions.

  University of Malta, Faculty of Social Wellbeing.

  https://www.um.edu.mt/library/oar/bitstream/123456789/76692/1/Substance\_use\_in\_adolescence\_and\_emerging\_adulthood\_trends\_developments\_and\_transitions\_2021.pdf
- Camilleri, E. (2025, July 18). Saru 280 test tal-breathalyser fit-toroq ta' pajjiżna fl-aħħar sena u nofs. ONE. Retrieved from https://one.com.mt/saru-280-test-tal-breathalyser-fit-toroq-ta-pajjizna-fl-ahhar-sena-u-nofs/
- Caritas, OASI Foundation, Sedqa, Community Police, & Agenzija Żgħażagħ. (2023). Final version PAVE proposal 2023–2024: Project proposal / costings. Unpublished manuscript.
- Casey, B. J. (2015). Beyond simple models of self-control to circuit-based accounts of adolescent behaviour. *Annual Review of Psychology*, 66(1), 295–319. https://doi.org/10.1146/annurev-psych-010814-015156
- Formosa, S., & Formosa Pace, J. (2025). *CrimeMalta observatory annual crime review:*Year 2024. Pietà: CrimeMalta Observatory. https://doi.org/10.5281/zenodo.15036320

- Government of Malta. (1854). *Criminal Code* (Cap. 9, Art. 338 ff.). https://legislation.mt/eli/cap/9/eng/pdf
- Government of Malta. (2011). *Trading Licences (Amendment) Act* (Act No. XIII of 2011).

  Parliament of Malta. Retrieved from the ELI portal

  https://legislation.mt/eli/act/2011/13/eng#:~:text=Tip:%20Act,Format:%20PDF
- Grech, A., & Axiak, S. (2015). A national snapshot of substance misuse among child and adolescent psychiatric inpatients in Malta. Psychiatria Danubina, 27(Suppl. 1), 353–356. https://hrcak.srce.hr/file/384181
- Lees, B., Meredith, L. R., Kirkland, A. E., Bryant, B. E., & Squeglia, L. M. (2020). Effect of alcohol use on the adolescent brain and behaviour. *Pharmacology Biochemistry and Behaviour*, 192(172906). https://doi.org/10.1016/j.pbb.2020.172906
- Malta Daily. (2025, July 15). *157 persons found drunk driving in past year & a half*. Malta Daily. https://maltadaily.mt/157-persons-found-drunk-driving-in-past-year-a-half/
- Ministry for Social Policy and Children's Rights. (2025, June 25). *National alcohol policy*.

  Government of Malta. https://family.gov.mt/wp-content/uploads/2025/06/NationalAlcoholPolicy.pdf
- OASI Foundation. (2025, May 15). Laughing gas is not a laughing matter: A local report.

  OASI Foundation. https://oasi.org.mt/wp-content/uploads/2025/05/Laughing-Gas-is-not-a-Laughing-Matter-1.pdf
- Romer, D., Reyna, V. F., & Satterthwaite, T. D. (2017). Beyond stereotypes of adolescent risk taking: Placing the adolescent brain in developmental context. *Developmental Cognitive Neuroscience*, 27, 19–34. https://doi.org/10.1016/j.dcn.2017.07.007

- Spear, L. P. (2016). Alcohol consumption in adolescence: A translational perspective. *Current Addiction Reports*, *3*(1), 50–61. https://doi.org/10.1007/s40429-016-0088-9
- Times of Malta. (2025, July 21). Five Paceville shops to face charges for selling alcohol after 9 pm. Times of Malta. https://timesofmalta.com/article/five-shops-face-charges-selling-alcohol-9pm.1113422
- World Health Organisation. (2019). Malta: Alcohol consumption, harm and policy responses. https://cdn.who.int/media/docs/librariesprovider2/country-sites/malta/achp fs malta.pdf?sfvrsn=214f2b0c 3&download=true
- World Health Organisation. (2023, January 4). *No level of alcohol consumption is safe for our health*. WHO Regional Office for Europe. https://www.who.int/europe/news/item/04-01-2023-no-level-of-alcohol-consumption-is-safe-for-our-health
- World Health Organisation. (2024, August 21). *Alcohol use*. https://www.who.int/europe/news-room/fact-sheets/item/alcohol-use
- Xu, X., & Chaloupka, F. J. (2011). The effects of prices on alcohol use and its consequences. *Alcohol Research & Health*, *34*(2), 236-242. https://pmc.ncbi.nlm.nih.gov/articles/PMC3860576/

