

## Unrecorded alcohol: significant neglected challenges

*Unrecorded alcohol constitutes almost one-third of total global alcohol consumption and can be divided into several categories needing different policy approaches. Better knowledge about unrecorded alcohol, especially concerning the alcohol industry's special commercial interests, is needed to produce effective policies for both recorded and unrecorded alcohol.*

Moonshine, non-commercial and other non-regulated alcohol ('unrecorded alcohol', hereafter) has a substantial share of total consumption and contributes to the magnitude of alcohol-related harms globally. The World Health Organization (WHO) [1] estimates that unrecorded alcohol makes up to 30% of total global alcohol consumption. Harms from unrecorded alcohol break out in high and low drinking settings alike, even within settings where consumption is prohibited (for example [2]). In many countries, unrecorded alcohol consumption outweighs that of recorded alcohol consumption. For example in Nepal, 92% of adult per capita consumption is from unrecorded alcohol, in Chad 91% and Peru 58% [1].

The scope of unrecorded alcohol varies across societies. In most modern societies, unrecorded alcohol refers to beverages that are not recorded or reported by national or subnational official statistics, including taxation or alcohol industry systems. The status of unrecorded alcohol depends upon the legal definition of alcoholic beverages and laws related to production, importation, distribution, sales and taxation. Many terms with different meanings are used commonly when referring to the whole and some parts of unrecorded alcohol (illegal, illicit, smuggled, homebrewed, surrogate, indigenous, traditional and moonshine alcohol); these terms must be used carefully.

Public policies addressing this issue should take into account the heterogeneous natures of unrecorded alcohol, including diverse beverage types, producers, consumer groups and harms. Unrecorded alcohol can be categorized into six groups (Table 1), although some beverages can be included in more than one group. These groups differ in terms of beverage types, price, availability and legal status. Thus, they differ in their appeal to drinkers and potential drinkers. Sectors involved in each category may also vary, and hold competing stances with one another.

Illegally produced alcohol ranges from products of moonshine from grass-roots producers to those of industrialized production, such as counterfeit beverages. Conventionally, the use of moonshine alcohol is mainly at the

local level by producers, families and communities, and it may relate to local culture and ritual events. In modern times, however, the products of moonshine brewing may enter informal for-profit commercial markets. The attractiveness of moonshine alcohol includes a competitive price, generally high purity and unique production methods. With economic growth and globalization, consumers of illegal beverages in the developing world may shift to commercialized alcohol. Younger populations may be less likely to drink traditional or moonshine alcohol. In Thailand, for example, the proportion of regular drinkers who drink illegally produced traditional *Lao Khao* (a potent alcohol rice whisky) was 76% lower for those under 25 years of age compared with those aged more than 60 years [3].

Unrecorded alcohol affects alcohol-related harms through many mechanisms. The availability of unrecorded alcohol may impact the formulation and outcomes of taxation and availability of control policies. The use of traditional beverages influences social availability and the social climate related to drinking.

The issue of quality, particularly regarding toxic compounds, is the most controversial issue. Apart from ethanol, unrecorded alcohol might contain other chemical components potentially harmful to health [4]. However, Lachenmeier & Rehm [5] state that problems attributable to toxic contaminants occur far too seldom to constitute a major public health threat, because there is inadequate evidence to conclude that much of non-commercial alcohol is contaminated or toxic, and the most important determinants for harms from unrecorded alcohol are volume of ethanol and drinking pattern.

Policies targeting illegal alcoholic beverages may play a role in preventing and controlling alcohol-related harms. Tackling unrecorded alcohol may be a rare win-win solution among stakeholders with different interests. Lachenmeier *et al.* [6] describe six groups of policy options. Some interventions are specific to particular types of beverage (e.g. ban on industrial alcohol), while others are more general, such as price reduction of recorded alcohol. The WHO's Global Strategy to Reduce Harmful Use of Alcohol recommends Member States to tackle 'illicit and informally produced alcohol', including through 'regulating sales of informally produced alcohol and bringing it into the taxation system' and 'public warnings about contaminants and other health threats from informal or illicit alcohol' [7].

Dealing with unrecorded and recorded commercial beverages may require different policy tools. Addressing