

Brussels, 25 November 2015

Re: Consultation on the review of the existing "structures" legislation of excise duties on alcohol and alcoholic beverages

Dear Sir or Madam,

We are writing on behalf of the Council of European Dentists (CED). The CED is the representative organisation for the dental profession in the EU, representing over 340,000 practising dentists through 32 national dental associations. Established in 1961 to advise the European Commission on matters relating to the dental profession, the CED promotes high standards of oral healthcare and effective patient-safety centred and evidenced-based professional practice across Europe. **The CED would like to thank the Commission for the opportunity to provide comments to the consultation on the review of the existing "structures" legislation of excise duties on alcohol and alcoholic beverages.**

European dentists, as health professionals strongly support any initiative that has as its aim improving general and oral health of Europeans. Excessive consumption of alcohol, against which dentists warn their patients as part of their health promotion role, affects general and oral health in numerous negative ways. According to the World Dental Federation, harmful use of alcohol causes 3,3 million deaths every year and 5,1% of the global burden of disease is attributed to alcohol consumption. Alcohol is a major risk factor for cancers of the mouth, larynx, pharynx and oesophagus and for periodontal disease, while abuse of alcohol can lead to injury, often to the mouth and teeth through falls, road traffic accidents or violence. Finally, the acidity and high sugar content of alcoholic drinks can cause tooth erosion and decay.

In conclusion, the CED believes that it is important to guarantee an effective, efficient and coherent EU legal and fiscal framework for alcohol and alcoholic beverages. **While we note that the main goal of such a framework is to ensure proper functioning of the Internal Market, we call on the Commission to consider in formulating any future proposals also the public health effects of alcohol consumption.**

Sincerely yours,



Dr Marco Landi
CED President



Dr Hendrike van Drie
Chair of CED Working Group Oral Health