

Diyath Samarasinghe

# UNRECORDED ALCOHOL



# Our vision

*FORUT's vision is a world in peace and without poverty,  
where all are secured human rights and social justice,  
and where alcohol and drugs do not prevent people's  
well being and fulfilment of human potential.*

Unrecorded Alcohol  
by Diyanath Samarasinghe

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## Foreword

Unrecorded alcohol consumption is by nature not included in official statistics of production and distribution in a country. It is outside the reach of governmental control whether for imposition of fiscal levies or public health based policies. In most countries in the world such alcohol is consumed in smaller or larger quantities. The illicit products may be beer or spirits, unbranded or counterfeit, produced at home or in covert semi- industrial production units. The products may be for immediate consumption or distributed across longer distances, even smuggled across borders.

The very fact that these beverages are unrecorded makes it obviously difficult to assess the size of this consumption, compared to legally sold alcohol. We therefore have to rely on estimates to get a picture of the size and scope of this problem.

A study for the World Health Organization in 2002 presents estimates of recorded and unrecorded alcohol in different regions of the world. This study indicates that the proportion of unrecorded beverages varies greatly across the globe. While it is estimated that maybe ten per cent of the alcohol consumed in Western Europe is unrecorded, the corresponding figures are 45 per cent for Sub-Saharan Africa and as high as two thirds for parts of South-East Asia.

In regions where the unrecorded alcohol consumption is high, this fact necessarily has to be taken into account when planning strategies and interventions to reduce alcohol-related harm. The need for evidence-based interventions to control the availability of alcohol (taxes, licences,

hours of sale etc) is not reduced. On the contrary; such interventions directed to the formal, legal production and sale have to be combined with actions to control the unrecorded market. It is in the interests of government from both a fiscal and a policy perspective to move towards eliminating illicit production and sale and to bringing informal supply under the taxation system.

The present paper by Professor Diyanath Samarasinghe at the University of Colombo, Sri Lanka, gives an introduction to how the problem can be understood and how it can be addressed; by communities, governments and NGOs.

FORUT, a development agency with poverty reduction as a priority, takes special interest in this issue. The poorest people of the poorest countries tend to consume illicit liquor as their main source of alcohol. Such beverages are often cheaper than legal alcohol, also because they are not taxed. For FORUT it is imperative to have a knowledge-based, case-specific and comprehensive approach to alcohol prevention, and addressing the unrecorded consumption is a key part of such an approach.



**Morten Lønstad**  
FORUT Secretary General

Malawi – Photo: Eli Gunnvor Grønsdal



## Introduction

National alcohol policies do not seriously address the production and use of alcohol that happens outside the reach of official enforcement authorities. The kinds of production and use of alcoholic beverages that are not subject to official notice, whether for imposition of fiscal levies or other formal controls, cover a wide range. The use of such alcohol is commonly referred to as 'unrecorded alcohol consumption' (WHO 2004a), while the alcohol so traded is generally called 'illicit alcohol' or 'illegal alcohol'.

A good part of unrecorded consumption is of illicitly produced alcohol products. Policies to address alcohol problems concentrate on the licit or legal market and the officially recorded consumption (WHO 2004b). They relegate consideration of illicit alcohol to a footnote or a passing reference. The effectiveness of alcohol policies is not impaired by this occurrence, where illicit alcohol use is low – as is the case in most rich countries. But illicit alcohol constitutes the larger part of alcohol consumption in many of the poorer countries. When these countries wake up to the need for alcohol policies and look for recommended or evidence based policies in operation elsewhere, they discover those that are already in operation in the richer world. Rich countries tend to have more comprehensive alcohol policies in place.

Policies that help reduce alcohol problems in rich countries are effective in poor countries too, but perhaps not as much as they are in the richer world. In many of the poorer countries there is often a flourishing illicit market in alcohol. This segment is generally ignored, simply as a nuisance, when it comes to developing alcohol policies.

We need to look at unrecorded alcohol use as more than just a distraction in policy development for poorer nations. Deliberate consideration has to be given to this segment, wherever it constitutes a fair proportion of total consumption (Anderson 2005). Policies should not be allowed to just copy measures from countries where illicit use is low, and ignore illicit use as a mere distraction, if illicit consumption in the country is significant – say more than 15 - 20% of total consumption. The problem is that illicit or illegal production by its very nature does not allow easy quantification.

The task of making alcohol policies sufficiently comprehensive to cover licit or legal products as well as illicit alcohol is not easy. There are no real tested examples to follow. We do not even have a theoretical model to apply. But the effort must begin now, for we are already late.

## Types and varieties

National alcohol policies do not seriously address the production and use of alcohol that happens outside the reach of official enforcement authorities. The kinds of production and use of alcoholic beverages that are not subject to official notice, whether for imposition of fiscal levies or other formal controls, cover a wide range. The use of such alcohol is commonly referred to as 'unrecorded alcohol consumption' (WHO 2004a), while the alcohol so traded is generally called 'illicit alcohol' or 'illegal alcohol'.

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## Issues of concern

It is probably true that the poorer a country or community is, the greater is the consumption of illicit alcohol, as a proportion of its total alcohol use. By region, unrecorded alcohol consumption is estimated to be about two thirds of the total in the Indian subcontinent, half in Africa and a third in Latin America (WHO 2004).

To rely heavily on policies that are recommended from studies where unrecorded consumption is low (for example those excellently summarised in Babor et al, 2003 and Edwards et al, 1994) for countries where it constitutes even a third of consumption is unwise.

### Money matters

Alcohol use has complex impacts on poverty and poverty alleviation efforts (Baklien and Samarasinghe, 2003), and efforts to reduce poverty must address alcohol use in a nuanced manner. There is the further complication that the poorest people in poor countries generally consume illicit liquor as their main source of alcohol.

Quite apart from the effect on individual families, a large segment of alcohol use being in the illicit or informal sector has significant impact on state revenue in non-industrialized countries.

### Criminality

Illegal trade in alcohol is among the most pervasive of criminal activities in a good part of the world. Because the stereotype is of a poor woman in a rural community selling home made brew to raise money to feed her family, the organised criminal activity that lies beneath much illicit alcohol production and sale is not quite noticed. Reference to this segment of the market as 'home brewed' alcohol under the inoffensive heading 'unrecorded consumption' (e.g., WHO 2004a) also helps to sanitize the trade and make it appear rather an innocuous activity.

The criminal element needs more emphasis. The legal tobacco trade has been accused of colluding in large-scale tax evasion by smuggling and other operations, which charge has not been made so far about the legal alcohol trade. The potential is quite strong for a large part of possible national revenue from alcohol being lost through other means of bypassing the tax structures. More study is needed of what proportion of the alcohol production of large scale legal manufacturers is declared to the authorities for purposes of tax, and how money derived from any undeclared production is laundered.

Significant loss of state revenue results from organised illegal or illicit alcohol producers and dealers. This is more widely accepted to be a criminal activity. The negative impact here too is not only from lost revenue but also from the association with criminal elements and what happens to the illegal profits that results.

### Where does undeclared money go?

An ignored aspect of the substantial organised illicit trade is where the proceeds go. How does the trade launder the illicit alcohol money? Such hidden profits are easily directed into further criminal activity, bribes and other forms of corruption and various 'underworld' expenditures. Governments rarely pursue this so-called 'black money' diligently, to see where it is spent. Some of it may well be coming back to various individuals in government.

The presence of a sizeable illicit alcohol market invariably contributes to the siphoning off of money from the poorest segment of society. It also leads to a corruption and the undermining of good governance, which again have a disproportionate detrimental impact on the poor and on efforts to promote their development.

### Safety

The perception is widespread that illicit alcohol is generally unsafe because it is not 'wholesome'. Instances where consumption of an illegal brew leads to death readily reach news headlines. The natural conclusion from such accounts is that ethyl alcohol in properly sold legal brews is perfectly safe while adulterants and impurities in illicitly produced beverages are the problem. These impressions are strengthened by the fact that impurities are not always accidental. Some illicit producers add various strange ingredients in a bid to make their beverage more 'potent', and even advertise the fact. Others supplement their brews and distillates with industrial alcohol, with its own added toxins. Agents that cause more chronic harm have been suspected in Eastern Europe (Szcs et al, 2005)

Even a cursory examination of stories about deaths that result from the consumption of contaminated illicit alcohol will show that such instances attract wide publicity. The death of even one or two persons from contaminated alcohol use in a remote corner of the world somehow attracts worldwide media attention. This attention is puzzling. But it reinforces the impression that illicit alcohol is extremely 'unwholesome' while the licit product is 'wholesome'. Connected to this is the immediate response to any measure to restrict the sale of legal alcohols being opposed on the ground that it will lead to increased illicit alcohol production with horrendous health consequences. The argument is then further extended to make legal alcohols more freely available on the alleged ground that it will reduce harm from illegal brews and its validity appears to be gaining acceptance in some African nations (Guardian, 2007).

A study of illicit alcohol in Sri Lanka (Abeysinghe 2002) did not find any significant toxic contaminants. There are however undoubted instances where toxic substances in illicit alcoholic beverages cause serious damage. But given the apparent media attention to poisoning from illicit alcohol use, the instances that are reported seem remarkably few when viewed in relation to the vast number of people consuming illicit alcohol on a daily basis.

Harm from illicit alcohol is in many countries much more through its large contribution to total alcohol consumption than from impurities and toxins that may be found in it. This fact is generally underplayed, possibly because the idea that alcohol consumption, whether licit or illicit, is in total related to the level of harm is not popular with some powerful vested interests.

# Factors operative at different levels

## Local level

Illegal production and sale of alcohol is in many communities its most widespread criminal activity. The damaging consequences of it extends well beyond, through the associated bribery, protection and political patronage needed for it to continue. And it is generally allowed to operate more openly than any other unlawful behaviour, including the allied trade in other illicit substances such as heroin or cocaine. Despite its visibility and the common knowledge of where it operates, the trade in illicit alcohol is routinely classed as a problem that the enforcement authorities cannot arrest or control.

One reason for its resiliency may be the lack of real interest in suppressing the illegitimate business. The local illicit alcohol trader in a small village is generally not considered a serious social enemy. This is partly because local dealers are generally integrated with the community and are seen to be meeting an existing demand – which they are not responsible for creating. The local trader is part of the community and accepted as such by at least a fair segment of the local population. The product is in fact often referred to as 'traditional drinks' (Obot 2007). The village supplier has friends and relations among the rest. The visible village brewer is sometimes a woman trying desperately to feed a family.

The money people in the village spend on this local product stays in the village and isn't big. But even small-scale home brewed illicit alcohol sales can attract the attention of authorities. So the poor woman trying to keep a family fed still may need a more powerful sponsor. Or she has in some way to win approval from those in the village or outside who can if they wish stop her trade.

At the other extreme is illicit alcohol produced on a mass scale and distributed to a network of retailers. This kind of organized big business is run by criminal elements and need sponsorship from the authorities to maintain their operations undisturbed. The turnover is large, the operation organized by syndicates and resented by many in the community but accepted because there is a perception of threat to anyone who falls foul of the trade.

Everybody in a village knows where illicit alcohol is sold, but the illegal activity goes on unabated. Authorities seem to act only in a cosmetic way, leading to raids that simply replace an existing dealer with another. Where the trade is organised and seen by the public to be deliberately enticing more and more people to drinking heavily, there is more community resentment. And when the illicit alcohol business is part of a wider organized system, people in a community may be reluctant to try to rise against it. There are rare occasions though, when communities have mobilized themselves to force the dealers to stop. When there is wide participation, such actions are successful – at least in the short-term.

## National level

National alcohol policies are often directed at how to find the optimal balance between the harm from (legal or licit) alcohol and the economic and other perceived benefits from it (WHO 2004b, Babor et al 2004). Unrecorded alcohol is treated only as a side issue, not worthy of official attention, as far as national policies are concerned. If illicit alcohol is ever referred to, it is in the course of arguments that policies should not be too restrictive on the legal alcohol segment, as this will lead inevitably to more illicit consumption.

As a result, the main impact that illicit alcohol presently has on policy is to serve as a brake on all measures that are designed to reduce the availability and consumption of alcohol. Where the level of illicit consumption is high the fact that it serves as an impediment to the adoption of policies that work in entirely different settings is not entirely unreasonable.

It is true that the current policies, for instance to increase the real price through taxation, can apply only to products within the formal sector. But this fact can be over-emphasised by those who want to prevent the imposition of effective alcohol policies. The argument that a policy measure may lead to increases in the consumption of illicit alcohol is potent because of the widespread perception that illegal brews are vastly more dangerous than the licit. This argument is a powerful deterrent to policymakers who want to put in place the known effective policies. It is also a convenient argument for those who may want to obstruct effective policies because of other considerations.

The large scale illicit alcohol operations are likely to have sponsors at national level. Resultant corruption can reach high levels of political and enforcement agencies. The money from illicit sales being undeclared leads to more illegal activities as a ready channel of investment for such funds or to fraudulent financial operations in the process of 'laundering' such proceeds. All of these have further or secondary negative consequences.

## International level

Policy formulation is not an individual country business any more. A good part of policies enacted now are 'to fall in line' or to meet obligations arising from international treaties and agreements. The prevailing mood or culture in the international milieu has considerable influence on policies that countries decide to adopt, including those on alcohol.

Prevailing international wisdom appears to indicate that illicit alcohol is not a matter of interest in policy formulation. This is unfortunate for countries in which a large part (say over a third or more) of alcohol consumed is in the illicit category. And they likely contain well over half the world's population.

The most recent global report (WHO 2004a) does not emphasise 'illicit alcohol' under the broad heading 'unrecorded alcohol' although this

is by far the largest component in many countries, especially in Asia and Africa. 'Home brewing' is what is highlighted. This is likely due to the fact that in richer countries, illicit production is indeed mostly home-brewed or small-scale local manufacture. The United Nations Office on

Drugs and Crime pays no attention to illicit alcohol, which constitutes a noteworthy arena of organized crime in many countries. International deliberations on crime or on alcohol do not have illicit alcohol on the agenda and its size globally is unknown.

Predictably, attention to the informal or unrecorded consumption is still mostly in the rich countries (Nordlund and Osterberg, 2000; Stockwell et al 2004), where it is in fact relatively small compared to poor countries. And here again most of the unrecorded component is not usually derived from large scale illicit production.

*Malawi – Photo: Dag Endal*



## What more should be done?

We must start by recognising that illicit alcohol can and should be dealt with effectively. This segment of consumption cannot forever be left out of consideration when responses to reduce alcohol problems are considered. It is presently seen too much as an 'interference' with logical policy actions, instead of being recognised for what it is – in many countries a large and significant part of the whole that alcohol policies must address, and in some countries the largest. Responses have to address this segment in all its forms – uncontrolled, unrecorded, home-brewed, informal, diverted, untaxed and the like.

### Local action

The trade of these forms of alcohol is outside the law and there is scope for public action and responses from enforcement agencies directed at the trade.

#### a. Community responses

In fact, most reported 'community responses' to alcohol problems take the form of an uprising against the local illicit alcohol dealers. Such action is effective if it mobilizes popular support, which usually comes from women in communities where a large proportion of men are heavy and regular consumers of illicit alcohol. The tendency is for such mass movements to subside after a time and for things to return to the previous state because the intervention is purely a call up of mass support with no attempt to address the wider determinants that should be addressed. Mobilizing public crusades against the illicit alcohol trade is not an efficient means for creating a sustained improvement in community wellbeing. Such movements may sometimes stimulate law enforcers to act and this may produce a slightly longer benefit.

There are other local interventions that go further and try to arrange substitute means of income generation for the illicit traders – who are mostly poor and attracted to this trade for want of an easy alternative to earn a living. The finding in such cases is that the void is soon filled by other suppliers when the existing traders stop selling after being found some other means of livelihood. Finding alternative employment avenues for illicit traders is not a powerful means to address the trade, unless combined with other measures.

A broader based approach is needed for community efforts to succeed. This must address the local illicit sale as part of a wider community move which encompasses the demand for alcohol as well as the supply. And in addressing issues of supply and availability should look collectively at licit and illicit alcohol. The principles are described elsewhere (Samarasinghe, 2005) as are the means of applying them in real life (WHO, 2006).

Action should include a persistent community wide dialogue about the presumed gains and losses from alcohol – both its sale and its consumption. Where the strategy succeeds, there is an improvement of community understanding and people begin to question previous assumptions. This includes their being able to question the presumed gains from drinking alcohol as well as from trading in alcohol. Very often the community begins to recognize that the local illicit dealer's family loses in several ways that are not immediately seen – such as family wellbeing and harmony, education of children and so on. Then

there is also the discussion of the influence of the dealer's actions on the general wellbeing of the community. The illicit traders feel like weaning themselves away from the business as a result of this shift in the community perception as well. The dialogue extends also to the legal alcohol suppliers, who are not whitewashed as providers of wholesome beverages while just singling out the illegal dealers as the only bad influence.

The recommended community responses are therefore interventions to engage the illicit alcohol trade as part of a broader community-wide action that includes the licit supply as well as factors that sustain a demand for alcohol in general. The illicit trader should become part of the whole community's process of questioning various assumptions, in the move towards greater shared wellbeing.

The inducement to curtail the sale has to be supported by a significant number of consumers too and not driven entirely by an opposing force that attacks both the consumers and the illicit providers.

#### b. 'Enforcement agency responses

The sale of illicit alcohol is against the law but often able to continue in well known locations. There is hardly any other criminal activity that is allowed to take place with as much visibility as the trade in illicit alcohol. Why this illegal activity is so widely accepted needs to be examined as part of the search for solutions.

Probably the largest contributor is widespread acceptance of the illicit alcohol trade as a 'natural' part of the local landscape. Another could be the perception that any efforts to curtail it are futile. Previous attempts that have led nowhere, or indeed led to trouble for those who tried, may reinforce this perception.

More active enforcement action may have been expected from the police or excise authorities or other official agencies. But here too, the general official response is lukewarm. And it is worthwhile exploring the reasons for the inertia. A frequent response from such authorities is that the illicit trade is not felt by the public to be a major irritant in most places. When the trade has been a low-key local affair co-existent with general community life for as far back as people can remember there is no pressure on the authorities to stop it, as long as it stays low-key. A less openly stated reason is corruption.

Inertia, corruption and inefficiency are all impediments to good enforcement action. Administrative pressure from higher authorities is one means of overcoming these obstacles. A second is sustained pressure from the communities concerned. This is difficult to organize. People can more easily be activated to invest great energy to rise as a group demanding an immediate response than to invest much less effort for a steady and sustained dialogue with enforcement authorities. Beneficial fallout on the illicit alcohol situation can result from interventions that are intended primarily to combat corruption.

If higher authorities in the police could be induced to change their criteria for assessing the performance of local police posts or stations, much good can be achieved. The tendency is for the local police to be judged by their number of arrests, raids or convictions. A better

indicator of police work in arresting illicit alcohol sales will be the degree of ready and easy availability of illicit alcohol or the openness of the trade. It is easy for the police to conduct cosmetic activities or even to convict small timers. The real criterion of effectiveness of enforcement efforts is whether illicit alcohol is becoming less or more freely available.

## National action

The aspects that national action has to deal with are many. On the one hand there is the problem caused by unrecorded alcohol disrupting the assessment and monitoring of the extent and trends of alcohol consumption and problems. This has the added consequence of complicating the evaluation of policies. At the same time, the presence of significant unrecorded alcohol use has direct health consequences – by adding to the population's total alcohol consumption, with its usual attendant problems, as well as through specific harms associated with illegal or illicit alcoholic brews.

In addition to adverse health effects there are also large impacts on law enforcement and corruption. The existence of a large trade in illicit alcohol impairs the enthusiasm for and effectiveness of alcohol policies. Some policy measures for reducing alcohol consumption may lead to the unintended result of increasing illicit alcohol use. This can be harmful in itself. It as well provides the legal alcohol trade with an argument to obstruct the adoption of effective policies and even to reverse them. Interested parties can blow up the potential harm way beyond the real impact.

The most important response required at national level, especially in countries where the consumption of illicit alcohol is significant, is to include it as an essential item within the substance of deliberations in policy formulation. There will need to be specific consideration of illicit alcohol as part of the body of all proposals. Not mentioning the subject allows even the formulators of the policy later to devalue their own policies.

In settings where the illicit trade is of significant proportions, specific mention should be made of the potential impact of each proposed policy response on the totality of problems, including any skew or unintended harm that may arise from its impact on the illicit market. This will allow more objective consideration of real and imaginary harm.

Ideally, there should be specific measures to address the varied forms of unrecorded alcohol consumption. These can begin even as experimental approaches for application in only some locations, to allow a comparative assessment of impact.

Records of a nation's total alcohol consumption should contain a separate entry for estimated illicit and other forms of unrecorded alcohol consumption. This must be provided in figures with an accompanying note of how the estimate was made to indicate openly the degree of confidence that can be placed on the numbers shown. Such a measure will lead to increasing accuracy of the estimates over time. New sources of data that are incorporated into the estimates as the years pass are best shown separately, rather than aggregated into one composite total, so as to permit valid temporal comparisons to be extracted.

Finally, national action can include suggested responses directed specifically at control of the illicit sector. The higher profiling of illicit alcohol as a result will lead to better enforcement, if nothing else. It should also increasingly sensitize authorities to the possible contribution from previously unnoticed diversion, avoiding payment of taxes, from the legal production facilities.

## International action

The 60th World Health Assembly in 2007 had on its agenda the item 12.7 on alcohol which made specific mention of illicit alcohol (WHA, 2007). The response it called for was, however, in the arena of community action. There is no mention of national policies that can reduce illicit alcohol use and related problems, or of action that the international community can take to encourage such national actions. Nor is there reference to international action to reduce the size of the 'unrecorded' segment.

International action can start by looking at ways of documenting more accurately the size of the traffic across borders – whether with payment of duties or without. Once better documentation is in place there can be suggestions for reducing the size of this transfer of at least for a proper accounting of it in specific figures, to assist the accurate monitoring of national consumption and related impacts.

Then there are the possibilities for joint international action to curtail or control the size of the traffic where it is found to be extreme. Given the size of the illicit trade in some countries and the alliance with organized crime there is an argument for enlisting the international agencies dealing with organized crime, money laundering, corruption, smuggling, corporate fraud and other such matters. The United Nations Office on Drugs and Crime has at present no responses to deal with illicit alcohol. The manner in which illicit alcohol money is moved around or laundered receives none of the attention that illegal drug money gets.

# Conclusions

Illicit alcohol is a large and particularly damaging component of unrecorded alcohol consumption. Unrecorded alcohol use constitutes in many poorer countries a large, and in some instances the largest, share of all alcohol consumption.

The well-recognized harm from illicit alcohol use is readily and widely attributed to toxic constituents and impurities but not to that resulting from its contribution to total alcohol consumption of the population. This tendency prevails even in settings where unrecorded consumption exceeds that of legal brews.

Policies effective in wealthier countries are often less so in poorer countries with large proportions of alcohol consumed being of the 'unrecorded' category. Some measures may even have untoward consequences.

Interested parties can also use the presence of a sizeable market in unrecorded alcohol as an argument to block the adoption of effective policies – by highlighting or exaggerating possible increases in illicit alcohol use that can result from the adoption of such policies.

Enhanced criminality, corruption and other negative social consequences that result from large-scale illicit markets are ignored in national and international forums. So also is the possible collusion of the legal alcohol trade in the illicit business.

Among responses to be recommended are the following:

- *Generating comprehensive community-wide processes rather than actions narrowly focussed on just the illicit supply of alcohol are likely to be effective in creating longer term benefits. The focus should be on improving understanding of factors that promote increased use and trade in alcohol, including features specific to illicit alcohol. These should preferably avoid trying to isolate illicit use from licit alcohol use and should also address the demand side.*
- *Addressing barriers to effective enforcement at local level are likely to bear fruit. Using pressure from higher administrative authorities of the enforcement agencies is one means. Another is to maintain sustained demand from the public, asking for effective policing.*
- *An estimate of unrecorded alcohol use should be included in national records, with its basis clearly set out.*
- *National alcohol policy formulation should, in countries with relatively high unrecorded consumption, specifically mention and deal with this segment. The policy measures considered should be placed in the context of the country's total consumption and not be directed only at the licit segment.*
- *Specific measures to deal with illicit or unrecorded alcohol should be added to the policy mix now popular. Ways of testing these out in experimental locations can easily be worked out. Attention should be paid, in countries where the illicit alcohol sector is 'organised' and large scale, to how the proceeds are laundered and to the criminal networks and associated*

*corruption. Potential covert connection with the legal alcohol trade should also be examined.*

- *International action should include attention to better estimation and documentation of cross border trade and smuggling. Discussions on alcohol policy in international parleys should include unrecorded alcohol as a specific agenda.*
- *Relevant agencies dealing with organised crime, money laundering, political corruption and large scale smuggling and the like should pay attention to the substantial contribution of illicit alcohol to these.*

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