

**Article title:** A Framing Analysis of Consultation Submissions on the WHO Global Strategy to Reduce the Harmful Use of Alcohol: Values and Interests

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**Supplementary file 2.** Identified Framing Defining ‘the Problem’

**Table S2.** Expanded table of the identified frames, submitting stakeholders and exemplifying quotes.

Frames		Quotes	Stakeholders
<b>Defining the (harmful) use of alcohol</b>	Harmful use of alcohol, especially by individuals in at-risk groups or who engage in risky behaviours, is the problem	<p>“Put more emphasis on harm indicators related to HED, Underage drinking, mortality and morbidity linked to harmful use of alcohol instead of focusing only on national average pro capita consumption.” (CEEV, trade association)</p> <p>“A recent study looking at British consumption suggests that average alcohol consumption is not evenly distributed across all consumption levels and that drops in the population average may mask increase among heavy drinkers. The indicators of HED and alcohol related mortality and morbidity are much more relevant in measuring progress against the Global Alcohol Strategy than changes in per capita consumption. The focus going forward should continue to be on</p>	<p><b>Member States and governmental institutions</b>            Permanent Representation of Italy to the International Organizations            United States of America</p> <p><b>UN system and other international organisations (IGOs)</b>            United Nations Conference on Trade and Development</p> <p><b>Private sector entities</b>            Alcohol Awareness Foundation Ireland (trading as Drinkaware)            Alcohol Beverages Australia            Asociación Dominicana de Productores de Ron (ADOPRON)            AssoBirra            Association for Alcohol Responsibility and Education (aware.org)            Association of Alcohol Manufacturers and Importers            Australian Grape and Wine Inc. Australian Grape &amp; Wine)            Beer Canada            Beer Institute            Belgian Brewers            Brazilian Beer Trade Association (SINDICERV)            Bundesverband der Deutschen Spirituosen-Industrie und -Importeure e.V. (BSI)/Federal Association of the German Spirits Industry and Importers (BSI)            Caribbean Breweries Association (CBA)            CEEV, Comité européen des entreprises vins            Cerveceros de España            Cerveceros Latinoamericanos</p>

		<p>tackling harmful drinking.” (The UK alcoholic drinks trade associations, trade association)</p>	<p>CTA – Confederation of Business Associations of Mozambique  Distilled Spirits Council of the United States  Drinks Ireland  DrinkWise  Educ'alcoola  FEDERACIÓN ESPAÑOLA DEL VINO (FEV)  Fédération des Exportateurs de Vins et Spiritueux de France (FEVS)  FIVS  Fundación de Investigaciones Sociales A.C. (Foundation of Social Research)  International Alliance for Responsible Drinking (IARD)  ISWAI International Spirits &amp; Wine Association of India  Japan Spirits &amp; Liqueurs Makers Association (JSLMA)  Mexican Chamber of the Tequila Industry  México’s National Chamber of Beer and Malt  Regional Beverage Alcohol Alliance (RBAA)  Representantes-Importadores de Vinos y Licores Asociados (RIVLAS)  South African Liquor Brand owners Association  Spirits New Zealand, New Zealand Winegrowers and the Brewers Association of New Zealand  spiritsEUROPE  STIVA (Foundation for responsible alcohol consumption)  The Brewers of Europe  The UK alcoholic drinks trade associations: British Beer &amp; Pub Association, National Association of Cider Makers, Scotch Whisky Association and Wine and Spirit Trade Association  Trinidad &amp; Tobago Beverage Alcohol Alliance (TTBAA)  Vinos de Chile  West Indies Rum &amp; Spirits Producers Association (WIRSPA)  World Spirits Alliance  Worldwide Brewing Alliance</p>
<p>Alcohol use (i.e. per capita consumption) is the problem</p>		<p>“The term “harmful use” is misleading given the Global Burden of Disease Study suggested the level of consumption that minimizes health loss is 0.” (School of Public Health, The University of Hong Kong, academic institution)</p>	<p><b>Member States and governmental institutions</b>  Centre for Diseases Prevention and Control, Latvia  Cook Islands Ministry of Health  Federal Office for Public Health, Switzerland  Instituto sobre Alcoholismo y Fármacodependencia (IAFA), Costa Rica  Ministry of agriculture, Latvia  Ministry of Health of the Republic of Latvia  Ministry of Health, National Commission Against Addictions, Mexico  Ministry of Health, New Zealand</p>

		<p>“For example, the concept of “harmful use of alcohol” is highly problematic. It’s a term that is confusing and supports the narrative and myths of the alcohol industry. The term disguises both the real magnitude of the alcohol burden (see above) as well as the motives of the alcohol industry for the public and policy makers. (...) But nearly ten years after the adoption of the WHO GAS it is now important to revisit, rethink and reframe - to allow WHO and other UN partners to communicate more effectively, clearly and compellingly about alcohol harm and the alcohol policy solutions.” (IOGT, NGO)</p>	<p>Ministry of Health, Republic of Slovenia  Ministry of Health, Welfare and Sport, The Netherlands  Ministry of Public Health, Thailand  Ministry of Social Affairs of Estonia  NCPHA, MoH Bulgaria  Permanent Mission of Georgia to the United Nations Office in Geneva and other international organizations  South African Medical Research Council  Spanish Ministry of Health, Consumer Affairs and Welfare  The National Institute of Public Health, Czech Republic</p> <p><b>UN system and other IGOs</b>  European Centre Social Welfare Policy and Research  The Pacific Community (SPC) (on behalf of Pacific Island Countries and Territories)  UNDP</p> <p><b>Academic institutions</b>  Community Action on Youth and Drugs National Coordination Team, Massey University  MRC/CSO Social and Public Health Sciences Unit, University of Glasgow  School of Public Health, LKS Faculty of Medicine, The University of Hong Kong  SHORE Research Centre  SPECTRUM (Shaping Public hEalth poliCies To Reduce IneqUalities and harM)  TRAPS (Transformative Research on Alcohol Policy and Science programme at the University of York)</p> <p><b>Non-governmental organisations (NGOs)</b>  Abstinentenverband des Kantons Zürich  AESKAN  AFGHANISTAN GREEN CRESCENT ORGANIZAION ( AGCO)  Alcohol &amp; Drug Information Centre (ADIC), India  Alcohol Action Ireland  Alcohol Action New Zealand  Alcohol and Drug Information Centre (ADIC)  Alcohol Focus Scotland  Alcohol Health Alliance  Amardeep India  APABurkina  Asia Pacific Alcohol Policy Alliance  Association for Promoting Social Action (APSA)  Australasian Professional Society on Alcohol and other Drugs (APSAD)</p>
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<b>Narrowing versus broadening the scope of the problem</b>	Negative consequences for individuals in at-risk groups or	“Alcohol related harms are not experienced uniformly across the population. With evidence (in Australia) that more consumers who drink are choosing to moderate their	<p><b>Member States and governmental institutions</b>  Ministerio de salud y proteccion social de Colombia  Permanent Mission of Georgia to the United Nations Office in Geneva and other international organizations  The State Agency for Prevention of Alcohol Related Problems, Poland</p> <p><b>Private sector entities</b></p>

	<p>who engage in risky behaviours</p>	<p>consumption, identifying cohorts where alcohol issues exist and addressing those risks should be the focus.” (DrinkWise, industry-funded NGO)</p> <p>“WHO also points to the average per capita consumption and establishes a direct relationship of alcohol consumption with damage to health, while reality shows that there are specific groups, whether by age or unhealthy habits of life (high in sugars and fats, spirits consumption and high intake episodes alcoholic) those whose (sic.) are scientifically related to major health problems” (Vinos de Chile, private sector entity)</p>	<p>Alcohol Awareness Foundation Ireland (trading as Drinkaware)  Alcohol Beverages Australia  Asociación Dominicana de Productores de Ron (ADOPRON)  AssoBirra  Association for Alcohol Responsibility and Education (aware.org)  Association of Alcohol Manufacturers and Importers  Australian Grape and Wine Inc. Australian Grape &amp; Wine)  Beer Canada  Beer Institute  Belgian Brewers  Brazilian Beer Trade Association (SINDICERV)  Bundesverband der Deutschen Spirituosen-Industrie und -Importeure e.V. (BSI)/Federal Association of the German Spirits Industry and Importers (BSI)  Caribbean Breweries Association (CBA)  CEEV, Comité européen des entreprises vins  Cerveceros de España  Cerveceros Latinoamericanos  CTA – Confederation of Business Associations of Mozambique  Distilled Spirits Council of the United States  Drinks Ireland  DrinkWise  Educ'alcool  FEDERACIÓN ESPAÑOLA DEL VINO (FEV)  Fédération des Exportateurs de Vins et Spiritueux de France (FEVS)  FIVS  Fundación de Investigaciones Sociales A.C. (Foundation of Social Research)  International Alliance for Responsible Drinking (IARD)  ISWAI International Spirits &amp; Wine Association of India  Japan Spirits &amp; Liqueurs Makers Association (JSLMA)  Mexican Chamber of the Tequila Industry  México’s National Chamber of Beer and Malt  Regional Beverage Alcohol Alliance (RBAA)  Representantes-Importadores de Vinos y Licores Asociados (RIVLAS)  South African Liquor Brand owners Association  Spirits New Zealand, New Zealand Winegrowers and the Brewers Association of New Zealand  spiritsEUROPE  STIVA (Foundation for responsible alcohol consumption)  The Brewers of Europe</p>
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Negative health, social and economic consequences for wider society	<p>“Recognising and applauding the fact that WHO defines health broadly, we note that the adverse effects of alcohol are not limited to health, even in WHO’s broad definition; alcohol consumption risks harm to the welfare not only of the drinker but also of others, and can impede sustainable social and economic development.” (Kettil Bruun Society for Social and Epidemiological Research on Alcohol, NGO)</p> <p>“In this context, alcohol’s harm to others could become a crucial dimension to unlock synergies across different policy areas by facilitating the recognition of alcohol harm in the affected policy areas. This recognition of the real harm of alcohol in turn fosters understanding of the need for alcohol policy solutions to achieve sustainable outcomes in affected policy areas.” (IOGT, NGO)</p>	<p><b>Member States and governmental institutions</b></p> <p>Federal Office for Public Health, Switzerland</p> <p>FPS Public health, Food chain safety and Environment, Belgium</p> <p>Guyana Mission</p> <p>Ministerio de Salud Pública de la República de Cuba</p> <p>Ministry of agriculture, Latvia</p> <p>Ministry of Health, New Zealand</p> <p>Ministry of Health, Republic of Slovenia</p> <p>Ministry of Health, Welfare and Sport, The Netherlands</p> <p>Ministry of Public Health, Thailand</p> <p>Ministry of Social Affairs of Estonia</p> <p><b>UN system and other IGOs</b></p> <p>European Centre Social Welfare Policy and Research</p> <p>UNDP</p> <p>United Nations Conference on Trade and Development</p> <p><b>Academic institutions</b></p> <p>MRC/CSO Social and Public Health Sciences Unit, University of Glasgow</p> <p>School of Public Health, LKS Faculty of Medicine, The University of Hong Kong</p> <p>SHORE Research Centre</p> <p><b>NGOs</b></p> <p>Abstinentenverband des Kantons Zürich</p> <p>AESKAN</p> <p>Alcohol &amp; Drug Information Centre (ADIC), India</p> <p>Alcohol Action Ireland</p> <p>Alcohol Action New Zealand</p> <p>Alcohol and Drug Information Centre (ADIC)</p> <p>Alcohol Focus Scotland</p> <p>Alcohol Health Alliance</p> <p>Amardeep India</p> <p>APABurkina</p> <p>Association for Promoting Social Action (APSA)</p>	

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