

March 10, 2022

Hon. Carolyn Bennett  
Minister of Mental Health and Addictions  
House of Commons  
Ottawa, Ontario,  
Canada  
K1A 0A6

Dear Minister Bennett,

Re: Public interest in warning labels, calorie information, and number of standard drinks being required on alcohol containers sold in Canada

A recent [CBC story](#) aired on *The National* in January 2022 highlighting research conducted at the University of Victoria's [Canadian Institute for Substance Use Research](#) regarding efficacy and public support for alcohol warning labels which communicate health risks to consumers of which they are mostly currently unaware. Many of the signatories of this letter have been involved in this and related research. We include a summary of some of that research with this letter.

Since the CBC story aired, many of us have been contacted by many members of the public, health professionals and fellow researchers asking what can be done to rectify the situation in which a widely used product classified by the WHO as a Class 1 carcinogen is being distributed and sold, often by government agencies, to consumers without warnings of this risk.

In addition, there is no information about the number of standard drinks in an alcohol container, or the volume of beverage that would constitute a standard drink (analogous to serving size information). For consumers, there is increasing risk with consumption of larger numbers of standard drinks, and Canadians [cannot accurately estimate their drinking levels using current label information](#). Nor is their calorie information on labels for most alcoholic beverages, as there is for most other consumed products. This is important because alcohol is calorie-dense with more calories per gram than sugar, and [alcohol accounts for approximately 10% of required energy intake among Canadian drinkers](#). Not surprisingly, excessive drinking is also strongly associated with being overweight, and being overweight and obesity are themselves important cancer risk factors (in addition to alcohol and its metabolites).

The [Canadian Substance Use Costs and Harms](#) project, funded by Health Canada, provides estimates of the comparative harms and economic costs of widely used psychoactive drugs. In 2017, alcohol was responsible for 18,320 deaths compared with 5,085 for opioids, 47,705 for tobacco and 1,080 for cannabis. In relation to emergency room presentations, alcohol was estimated to be responsible for 700,140, cannabis 41,040, tobacco 238,685 and opioids 51,355. The comparative annual economic costs show those associated with alcohol use exceed those for tobacco and all other substances combined at \$16.625 billion.

We note that Health Canada requires warning labels on other legal substances (i.e. cannabis and tobacco) despite their having less impact on economic costs and health service delivery compared with alcohol.

Canadian alcohol industry representatives have a history of suggesting cancer warnings are inappropriate. For example, they [used legal threats](#) to try and shut down a Health Canada-funded study conducted in the Yukon Territory to test the effectiveness of a range of carefully developed, evidence-based alcohol warnings, targeting the cancer warning in particular. Many of the people who have signed this letter were involved in this study. To be able to continue the study the Yukon government, while fully supporting the research, required that the cancer warnings were removed to avoid being involved in expensive legal costs. The study was nonetheless able to evaluate the impacts of these warning labels that were manually applied to products sold in the Yukon government liquor in Whitehorse during 2017 and 2018. Some highlights of the research findings were:

- consumers noticed the warnings, remembered them and showed improved knowledge of [alcohol health risks](#), of [low-risk drinking guidelines](#) and the [definition of a standard drink](#) (needed to monitor consumption and comply with guidelines);
- a clear majority of consumers supported or strongly supported [such labels being made compulsory](#) in the future;
- consumers said the labels made them think about [reducing their alcohol consumption](#);
- analysis of government sales data showed that during the labelling intervention, per capita alcohol consumption in Whitehorse [reduced by 7%](#) compared with control sites without the labels.

The study also published a formal [legal analysis](#) of the merits of industry arguments to the effect that a) the Yukon Territory did not have the authority to place warning labels on alcohol containers; b) the warnings "defamed" their product; and c) the labels violated manufacturers constitutional rights to "freedom of expression". The analysis showed none of these claims had legal merit and that, rather, territory and provincial governments have an obligation to inform citizens of health and safety risks of products available for sale, especially when they were directly involved in the distribution and retail sale of such products.

We note that approximately 50 WHO member countries require some kind of health-related labelling on alcohol containers. The US federal government requires health warnings and both the Yukon and Northwest Territories governments have required colourful pregnancy and/or general health warnings on alcohol products sold in their government liquor stores for over 30 years.

We recommend Health Canada give urgent attention to ensure that consumers are adequately warned of the health risks, especially of cancer, that are caused by alcohol use. These labels should also provide supporting information on national drinking guidelines and the number of standard drinks in containers of alcohol, and calorie information be required for all alcohol product labels.

Sincerely, the undersigned,

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*We acknowledge with respect the Lekwungen peoples on whose traditional territory the University of Victoria stands, and the Songhees, Esquimalt and WSÁNEĆ peoples whose historical relationships with the land continue to this day.*

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\*on behalf of oncologists from each province who submitted a proposal to the Canadian Medical Association to advocate for explicit labelling of alcohol beverages warning of carcinogenic risk to the consumer.

C.C. Jean-Yves Duclos, Minister of Health  
Brendan Hanley, MP for Yukon

*We acknowledge with respect the Lekwungen peoples on whose traditional territory the University of Victoria stands, and the Songhees, Esquimalt and WSÁNEĆ peoples whose historical relationships with the land continue to this day.*