

# EVIDENCED-BASED RECOMMENDATIONS FOR LABELLING OF ALCOHOL PRODUCTS IN CANADA



Developed by the Canadian Alcohol Policy Evaluation (CAPE) 3.0 Project Team



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## Evidenced-based Recommendations for Labelling of Alcohol Products in Canada

### 1. Overview

The following recommendations focus on evidence-based alcohol health messaging for labelling of alcohol products in Canada. Recommendations include:

- A rotating display of mandatory front-of-package labels with adequate health warning messages that are reviewed and updated regularly covering six defined topic areas (E.g. Cancer risk, other health impacts, violence, pregnancy-related risks, impaired driving, and harms to youth).
- Static standard drink information (i.e., number of drinks per container) paired with Canada's forthcoming national alcohol drinking guideline information.
- These label components should be prominently displayed on the container in terms of their proportion of the display panel, legibility, contrasting colours, and supporting pictorials.

Providing nutrition information in the form of a *mandatory [simplified nutrition facts table](#)* with *calorie content* on all alcohol products is also recommended (see [labelling regulations](#) in Ireland). This information is already mandatory for [some alcohol products](#) in Canada, and the simplified nutrition facts panel is an already well-established labelling tool; it is recommended that these labelling requirements become mandatory for all alcohol products. It is important to note that initiating implementation of nutrition information for all alcohol products should be considered a lower priority than health messaging and, if necessary, addressed through a separate process to ensure that it does not impede implementation of health messages.

### 2. Mandatory labelling of alcohol products, inscribed in legislation and defined in regulation

Mandatory labelling of all alcohol products with health messaging that is inscribed in legislation and set in regulation, rather than voluntary or industry self-regulatory labelling (Stockwell et al., 2019; Wettlaufer et al., 2019; WHO, 2022; PAHO, 2022), should be pursued by the federal government of Canada. Ireland's Public Health (Alcohol) Act provides a strong model to follow as it includes provisions allowing the Minister of Health to prescribe the size, style and message content of their health warning messages on alcohol products (Government of Ireland, 2018).

The label content for alcohol products, like other legislated labelling requirements (e.g. for [cannabis](#) and [tobacco](#) products), should be set in regulation as a requirement of manufacturer labelling and either printed on, or securely applied to (e.g. an adhesive label) a container (Stockwell et al., 2019). It should not fall off or be easily removed during transportation or normal use of the product.

### 3. Type of health message labels on alcohol products

The following is recommended as the type of mandatory alcohol health messaging for labelling of alcohol containers that should be implemented in Canada for all alcohol products. Note: Nutrition labelling is already mandatory for some alcohol products in Canada. These labelling guidelines should be applied to all alcohol products.

➤ **Health warning messages, standard drink information, and national alcohol drinking guidelines**

Front-of-package rotating health warning messages (six recommended topic areas outlined in Section 4.1) paired with static standard drink information and national alcohol drinking guidelines.

*3.1 Rationale for proposed health message labels*

Manufacturers have a duty to warn consumers of any risks inherent in the use of a product and provide consumers with adequate information to make an informed choice concerning use of the product. This standard of care is heightened when the product is intended for human consumption (Shelley, 2021). Health message labels on alcohol products should provide consumers with adequate (i.e., clear, complete, and current) information to make an informed health decision regarding use of the product. More specifically, an **adequate warning** shall meet the following criteria (Shelley, 2021):

- Communicated clearly and understandably
- Communicated in a manner calculated to inform the user of the nature of the risk and extent of danger
- Communicated in terms commensurate with the gravity of the potential hazard
- Must be explicit
- Should not be neutralized or negated by collateral efforts on the part of the manufacturer.
- Keep abreast of scientific developments
- Warn consumers of new risks

For alcohol, an **adequate warning** includes information about 1) the risks associated with alcohol use (Weerasinghe et al., 2020; WHO, 2022; PAHO, 2022), 2) national alcohol drinking guidelines (Schoueri-Mychasiw et al., 2020) as a tool to help make informed choices to mitigate those risks, along with 3) standard drink information in order to accurately make use of the drinking guidelines (Stockwell et al., 2019; Wettlaufer et al., 2019; Osioy et al., 2015; Wettlaufer, 2017; NASAC, 2015). Regulations should account for updated messaging to be added as research evidence evolves and/or patterns of use and alcohol-caused harms in Canada shift (Shelley, 2021).

It is critical that consumers understand the risks they are navigating given the well-established risks of consuming ethanol (IARC, 2010) and the significant burden of disease associated with its use (Shield et al., 2020). Health warning messages on alcohol containers play a role in raising awareness of health risks associated with alcohol use and address consumers' right to know of such risks, which is currently being denied. Increased awareness of the risks associated with alcohol is associated with decreased purchasing occasions, decreased drinking occasions, slower drinking rates, and greater support for other alcohol control measures such as minimum pricing (Zhao et al., 2020; Weerasinghe et al., 2020; WHO, 2022). Further, the evidence consistently shows that comprehensive health warning labels on tobacco products influence social norms around tobacco use, improve health knowledge, and help to curb consumption (WHO, 2022). See Kokole et al., 2021 for a recent scoping review of the evidence for potential impact of health warning messages on alcohol products.

The national alcohol drinking guidelines and standard drink information should be adequately conveyed alongside the risks associated with alcohol use to support individuals in making choices about their

health. The majority of Canadians are not aware of the national alcohol drinking guidelines (CADUMS, 2012; Sherk, 2019; Vallance et al., 2020b). Standard drink information provides complimentary and synergistic information in relation to the guidelines. The evidence is clear that individuals are not familiar with the concept and/or definition of a standard drink, which are both necessary information in order to make use of the national alcohol drinking guidelines (Wettlaufer, 2018).

#### 4. Recommended content for health message labels on alcohol products

##### 4.1 Recommended content of rotating health warning messages

Mandatory front-of-packaging health warning messages should include the following six warning topics, listed in priority sequence (WHO, 2022; Stockwell et al., 2019; Wettlaufer et al., 2019; CAPE, 2022). Note sample warning messages under each topic area are provided for illustrative purposes.

- a) **Series of cancer warnings** listing the different types of cancer alcohol plays a causal role  
*E.g. Warning: Alcohol use causes several types of cancer, including female breast cancer, oral cavity, pharynx, larynx, esophagus; and cancers of the colon, rectum, and liver; Warning: Alcohol consumption increases your risk of breast, colorectal and other cancers; Warning: There is a direct link between alcohol and fatal cancers; Warning: Alcohol causes cancer by damaging and disrupting the normal function of cells in the body.*
- b) **Series of general health warnings** that refer to increased risk of specific diseases as well as alcohol as a component cause for 200+ different conditions  
*E.g. Warning: Every individual drink consumed shortens life expectancy by about 5 minutes; Warning: One standard drink consumed every day shortens life expectancy by about 3 months; Warning: Warning: Alcohol use is a contributing cause of more than 200 diseases and health conditions; Warning: Alcohol use causes liver disease.*
- c) **Series of fetal alcohol/fetal alcohol spectrum disorder (FAS/FASD) and pregnancy warnings** that also mentions the risk of consuming alcohol while breastfeeding or when you may become pregnant. It should be noted that the risks associated with alcohol use before and during pregnancy, and while breastfeeding is an important, highly sensitive and potentially stigmatizing topic. Specific attention should be paid to the development of these warning messages including applying a gender and culture lens and involving a range of priority populations such as different socioeconomic groups and people with lived and living experience.  
*E.g., Warning: Alcohol use during pregnancy increases the risk of lifelong harm to your child; Warning: Do not use alcohol if you are pregnant or breastfeeding; Warning: the safest choice is not to drink alcohol at all when you are pregnant or may become pregnant.*
- d) **Series of violence related health warnings** that highlight the role alcohol plays in violence, including violent assault, sexual assault, and intimate partner violence. It should be noted that the role alcohol plays in sexual violence is an important, highly sensitive, and potentially stigmatizing topic. Specific attention should be paid to the development of these warning messages including applying a gender and culture lens, and involving a range of priority populations such as different socioeconomic groups and people with lived and living experience.  
*E.g. Warning: Alcohol increases aggressive and violent behaviour by disrupting normal brain function; Warning: Alcohol is a main risk factor that contributes to sexual violence.*

- e) **Series of impaired driving messages** with specific information beyond standard “Don’t drink and drive” messages.

*E.g., Warning: Even one drink can affect your ability to operate a motorized vehicle or heavy machinery; Warning: Alcohol affected driving is a leading cause of death on the road; Warning: Drinking alcohol reduces your ability to drive safely. Alcohol affects your judgement, vision, coordination and reflexes—increasing your risk of having a crash; Warning: If you have consumed alcohol, it is against the law to drive a vehicle if the level of alcohol in your blood or breath is over the alcohol limit for the licence you hold or the vehicle that you want to drive.*

- f) **Series of youth/young adult warning messages** about increased risk of harm from alcohol.

*E.g., Warning: Alcohol use negatively affects brain development among youth and young adults; Warning: alcohol-related traffic crashes are a major cause of death among young people.*

The authority mandating the alcohol health messages (i.e., Health Canada) should be prominently identified on each label as per [tobacco](#) and [cannabis](#) requirements. Signal words such as “Warning” or “Health Warning” should be used to indicate that a health warning message is to follow (WHO, 2022). Positively worded messages perform better e.g., “reduce your risk” and language that refers to causality and risk such as “increased risk” is more believable than “can cause” or “may contribute to” (WHO, 2022). Labels messaging should be provided in both English and French and a weblink to a Health Canada website with more information should be provided (See [labelling regulations](#) in Ireland).

#### *4.2 Recommended content for standard drink information message*

Number of standard drinks<sup>1</sup> per container of alcohol should be displayed to one decimal point E.g., “X.X standard drinks” in both English and French (NASAC, 2017). The format of standard drink information would be static across alcohol products with the number of drinks adjusted depending on % of alcohol by volume in a container. Standard drink information should follow recommended visibility requirements (i.e., prominently displayed, and legible under normal conditions of purchase and use), see Appendix A and C for examples. Standard drink information should be displayed in a mandatory specified location of the packaging and coupled with the national alcohol drinking guideline information.

#### *4.3 Recommended content for national drinking guideline information message*

National alcohol drinking guideline information should be a static message, communicated in both English and French, across all alcohol products and include description of Canada’s new no-risk, increasing-risk, and high-risk thresholds for alcohol use (e.g., risk zones). National drinking guideline information should follow recommended visibility requirements (i.e., prominently displayed, and legible under normal conditions of purchase and use) and should be displayed in a mandatory specified location of the packaging coupled with standard drink information.

#### *4.4 Recommended content for simplified nutrition fact table and calorie information*

Mandatory labelling for nutrition information and calorie content of alcohol beverages already exists for some products in Canada and should be applied to all alcoholic beverages. Canadian consumers should be informed about the nutrition content of alcoholic beverages, however, as noted above,

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<sup>1</sup> a standard drink = 13.45mg of ethanol

implementation of health messages should be prioritized. If addressing nutrition and calorie content creates delay or impediments to the process a separate process should be sought.

#### 5. Display of health messages and rotation of health warning message label content

Health messages including health warning messages, standard drink information, and national drinking guidelines should be displayed on all alcohol products (as well as nutrition/calorie content with caveat noted above (CAPE, 2022)). Health warning messages covering all six of the topics listed in section 4.1 should *rotate* within a 12-month period (PAHO, 2022; WHO, 2022) alongside *static* information on standard drink and national alcohol drinking guideline information. As is the case for Canadian [tobacco](#) and [cannabis](#) warning messages, all six topics of health warning messages should be displayed on each type of container of each brand name of the alcohol product that is packaged in a year (i.e., one health warning message per container), so that each message is displayed, to the extent possible, on equal numbers of containers of that product (Government of Canada, 2019). All health warning messages should be displayed using a rotation scheme that ensures warning messages cannot be selectively applied to specific products (e.g., pregnancy warning on products less likely to be purchased by women). To maintain their effectiveness and impact over time, health warning messages need to be rotated within and across products and updated regularly (Hammond et al., 2006).

#### 6. Prominence of the label - mandatory location, size, and colour

The health warning messages should appear in a mandatory location of the front principal display panel, comprise at least 30% of the principal display panel, be displayed on a solid and contrasting background colour (e.g. yellow background with red and/or black text) (PAHO, 2022; Kokele et al., 2021), see Appendix D for examples of voluntary temporary full-colour label/packaging changes for alcohol products. Similar to cannabis warning messages set in regulation, health warning messages for alcohol should have a minimum font size that exceeds that of the other health messaging labeling components.

Standard drink and national alcohol drinking guideline information should follow established requirements for nutrition facts table formats including occupying at minimum percentage of the available display surface, sufficient contrast between the text and the solid background (e.g., white background with black text) and should be legible under customer conditions of purchase and use, e.g., minimum of 6-point font. Labelling requirements should also specify a mandatory location on the package for the standard drink and national alcohol drinking guideline information.

#### 7. Pictorial content of labels

Warning messages should be supported by graphics, images, or symbols (PAHO, 2022) and follow best practices as noted in the evidence around tobacco warning labels (See [Government of Canada 2022](#)). These visual elements serve to draw increase attention to the warning and help to convey information and are an important tool to bridge any literacy or educational gaps (WHO, 2022).

#### 8. Alcohol industry involvement

Representatives of the alcohol industry should not have any input on the legislation, development, placement, content, size, or style of the mandatory health warning messages implemented on alcohol products (see Stockwell et al., 2020).

#### 9. Review and evaluation of health messages

The implementation of mandatory health messages on alcohol products in Canada should include third-party review and evaluation (free of alcohol industry involvement) to measure the efficacy and impact of

the labels from a public health perspective. Design, content, and rotation sequencing of the health warning messages should also be evaluated and updated based on the latest evidence of effectiveness for alcohol warning labels and other relevant factors such as updated national alcohol drinking guidelines, and emerging evidence on alcohol-related harms.

#### 10. Evidence related to alcohol warning labels, real-world evaluations, and impacts on behaviour change

Labelling alcohol products with warnings, standard drink information, national drinking guidelines and calories, etc. is based principally on a consumer's 'right to know'-- and the government's duty to inform - about the contents and attendant risks of commercially available products, particularly when those products are intoxicating, addictive carcinogens and leading public health hazards. Approximately three quarters of Canadians are unaware of the link between alcohol and cancer (Hobin et al., 2020b; Canadian Cancer Society, 2016; Sanderson et al., 2009). These levels of awareness have remained relatively stable over the past 15 years, suggesting the current mechanisms for informing consumers such as "Please Drink Responsibly" messaging are ineffective. As such, mandatory labelling is rooted in social justice, and a common-sense undertaking that is well supported by Canadians (Vallance et al., 2020b; Schoueri-Mychasiw et al., 2020) and should require compelling evidence of public harms for it *not* to be done. Finally, labelling for cannabis is required in Canada even though there is a paucity of evidence about direct impacts of cannabis labelling on behaviour change.

There is a robust and growing body of evidence that supports the implementation of alcohol health warning labels on alcohol containers (Kokole, Anderson & Jane-Llopis, 2021). Although we have largely focused on evidence for AWLs, the evidence supporting AWLs is consistent with that on the impacts of warning labels for [tobacco](#), which has been implemented in Canada. Comprehensive health warning labels on tobacco products influence social norms, improve health knowledge, increase quit attempts, and reduce consumption (WHO Europe, 2014; McNeill et al., 2017; Hammond, 2011).

The Yukon study of AWLs, and work by Greenfield et al. (1999) on warning labels in the US in the late 1990s, are two real world studies of AWL labels both of which show positive impacts in terms of reduced drinking behaviours, alcohol sales, self-reported drinking or increased awareness of alcohol as a health issue (Hobin et al., 2020a; 2020b; Zhao et al., 2020; Greenfield, Graves & Kaskutas, 1999). In addition, experimental and quasi-experimental studies across a range of online and laboratory settings find that health warning labels on alcohol products slow down drinking, decrease drinking occasions, decrease purchase occasions, and are associated with decreases in self-reported drinking for health reasons, intentions to reduce consumption, reduced alcohol sales and increased awareness of alcohol-related health risks (Kokole, Anderson & Jane-Llopis, 2021; WHO, 2022).

Label design and content play an important role in their effectiveness. In order to increase awareness and change behaviour labels need to be noticed and their content understood (WHO, 2022). This is important because consumers have a right to know the inherent risks associated with the use of alcohol, a right that is currently unmet in Canada (Shelley, 2021). By providing clear, complete, and current information that is prominently displayed on a product consumers will be better positioned to make informed choices compared to the current labels which do not carry adequate information to support informed decision-making. The provision of adequate health warning messages paired with national alcohol drinking guideline and standard drink information addresses manufacturers' duty to warn

consumers of the risks associated with the use of their product, a standard that is heightened when a product is meant for human consumption.

Additionally, the findings on the impacts of AWLs must be interpreted with the *goals* of the labels in mind and the broader policy context within which they are implemented. We must consider whether the label was designed to influence behaviour, to raise awareness, or both. Increased awareness plays an important role in behaviour change and shifting the culture around alcohol use (Wilkinson & Room, 2009). Specifically, an *indirect* relationship between impacts on awareness and behaviour change may exist. Health warning labels can be used as one tool to raise awareness about the health-related harm of alcohol consumption and in turn impact consumption. Furthermore, real world evidence suggests that increased awareness about the risks related to alcohol use, which can be enhanced through labelling, may ultimately lead to greater public support for policies that reduce the acceptability, availability and affordability of alcohol use, leading to reduced consumption over time (Weerasinghe et al., 2020). Finally, the effect of labels is optimized when reinforced by other policies that support the labels (e.g. government social marketing and public campaigns) and curb consumption (e.g. availability and pricing controls) (WHO, 2022).

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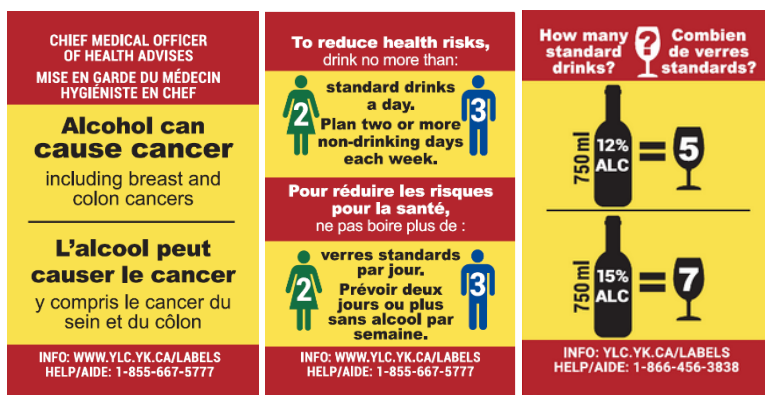
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### Appendix A: Examples of alcohol health information labels



Source: [Yukon Alcohol Warning Labels Study](#) (Vallance et al., 2020a)



Source: Priore et al., 2022

### Appendix B: Examples of cannabis and tobacco warning labels

Health warning messages – cigarettes: <https://www.canada.ca/en/health-canada/services/publications/healthy-living/health-labels-cigarettes-little-cigars.html#info>

Health warning messages – cannabis: <https://www.canada.ca/en/health-canada/services/drugs-medication/cannabis/laws-regulations/regulations-support-cannabis-act/health-warning-messages.html>

## Appendix C: Examples of standard drink information labels



**Australia and New Zealand:** [Labelling of alcoholic beverages \(foodstandards.gov.au\)](http://foodstandards.gov.au)

## Appendix D: Examples of manufacturer-initiated changes to product packaging including full-colour packaging and labelling



Crystal Head Vodka



Absolute vodka



Bud light



Barefoot wines



Cool Cat wine spritzer