

Canadian Institute for Substance Use Research (University of Victoria, British Columbia, Canada) and Centre for Addiction and Mental Health (Ontario, Canada) researchers

Re: Notification of Draft Regulations Under Section 12 of the Public Health (Alcohol) Act 2018
TRIS NOTIFICATION 2022/441/IRL (Ireland)

About our organizations

We are researchers working with the [Canadian Institute for Substance Use Research](#) (CISUR) at the University of Victoria, British Columbia, and the [Centre for Addictions and Mental Health](#) (CAMH), Ontario, in Canada. CISUR and CAMH are leading Canadian research organizations dedicated to the understanding of harms from substance use and the identification of evidence-based measures to reduce these. Both CAMH and CISUR are World Health Organization Collaborating Centres on alcohol policy and health. We are independent from commercial vested interest groups. Our alcohol research has included a major focus on labelling over the years, including the evaluation of the only real-world introduction of cancer warnings and other health messages in the Yukon Territory of Canada.

We support the government of Ireland's planned introduction of mandatory cancer warnings and informational labels on alcohol containers as consumers have a right to know about risks to their health from drinking, about guidelines for reducing risk, and for critical information on the contents of alcohol products relevant to their health and safety.

Background

From the [Notification of Draft Regulation](#):

In accordance with Directive (EU) 2015/1535, Ireland notified the European Commission of the draft Public Health (Alcohol) Bill 2015 on 27 January 2016 and amendments to the Bill were notified on 3 February 2018. In relation to the proposals on labelling of alcohol products (section 12 of the Bill) the Commission's response on 2 May 2018 stated that it could not assess the draft measure without more detailed information in relation to its modalities, i.e., the regulations which would provide the detail on how the requirement would operate. The draft regulations attached with this submission are those modalities.

Under section 12 of the Act labels on alcohol products must contain:

- i. A warning to inform people of the danger of alcohol consumption.
- ii. A warning to inform people of the danger of alcohol consumption when pregnant.
- iii. A warning to inform people of the direct link between alcohol and fatal cancers.
- iv. The quantity of grams of alcohol contained in the product.
- v. The number of calories contained in the alcohol product.
- vi. A link to a health website which gives information on alcohol and related harms.

Our recommendations

We are writing to express support for the Draft Regulation. There is clear evidence that labels containing factual information about alcohol's health harms (including cancers and liver disease), the dangers of consuming alcohol while pregnant, and information on alcohol content and calories, would be an effective way to inform Irish consumers of the risks of alcohol consumption.



**University
of Victoria**

Canadian Institute
for Substance
Use Research

Institut canadien
de recherche sur
l'usage de substances

camh
Centre for Addiction and Mental Health

Alcohol harms

The health and social harms from alcohol are substantial and consumers are not fully aware of the nature of these or their extent. European and North American studies show that [alcohol consumers are mostly unaware that alcohol is a carcinogen](#) despite WHO classifying it as such more than 30 years ago. Furthermore, the risk to health from alcohol use is directly related to the level consumed and there is [no absolutely safe threshold](#).

Alcohol is a significant cause of health harms in Ireland. As per an analysis performed by [UCC College Cork and Alcohol Action Ireland](#) using Global Burden of Diseases datasets, it is estimated that there were 1543 deaths attributable to alcohol from all causes in Ireland in 2019, which represents nearly 5% of all deaths.

1. Effective, evidence-based labels

Our own research here at CISUR and CAMH supports the Draft Regulation. For the last 10 years we have led [the Canadian Alcohol Policy Evaluation Project \(CAPE\)](#), a nation-wide exercise funded by the federal government to define and monitor the implementation of effective alcohol policies. The CAPE research team has developed [Evidence-based Recommendations for Labelling Alcohol Products](#) and include:

- **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.**
- Implementation of 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).
- Implementation of static standard drink information (i.e., number of drinks per container) paired with Canada's forthcoming national alcohol drinking guideline information.
- Label components should be prominently displayed on the container in terms of their proportion of the display panel, legibility, contrasting colours, and supporting pictorials.
- Nutrition information in the form of a mandatory simplified nutrition facts table with calorie content should be provided on all alcohol products.

The Draft Regulation is consistent with these evidence-based recommendations for effective labelling of alcohol products.

Together with Public Health Ontario, CISUR conducted one of the best-known studies on the effectiveness of alcohol warning labels. [The Yukon Labelling Study](#), which affixed brightly coloured, rotating labels on alcohol containers in Whitehorse, Yukon, Canada, was a rare real-world study of the effectiveness of alcohol warning labels in informing drinkers of the risks of alcohol and reducing consumption. Several academic papers have been published on the study, including:

- [Communicating risks to drinkers: testing alcohol labels with a cancer warning and national drinking guidelines in Canada](#), (Hobin et al., 2020)
- [Examining the impact of alcohol labels on awareness and knowledge of national drinking guidelines: A real-world study in Yukon, Canada](#), (Hobin et al., 2020, JSAD)
- [Testing alcohol labels as a tool to communicate cancer risk to drinkers: a real-world quasi-experimental study \(2020\)](#) (Hobin et al., 2020, JSAD)



**University
of Victoria**

Canadian Institute
for Substance
Use Research

Institut canadien
de recherche sur
l'usage de substances

camh
Centre for Addiction and Mental Health

- [Effects of strengthening alcohol labels on attention, message processing, and perceived effectiveness: A quasi-experimental study in Yukon, Canada \(2020\)](#), (Hobin et al., 2020, Intl J Drug Policy)
- [Testing the Effectiveness of Enhanced Alcohol Warning Labels and Modifications Resulting From Alcohol Industry Interference in Yukon, Canada: Protocol for a Quasi-Experimental Study](#) (Vallance et al., 2020, JSAD)
- [Improving Knowledge That Alcohol Can Cause Cancer Is Associated with Consumer Support for Alcohol Policies: Findings from a Real-World Alcohol Labelling Study](#), (Weerasinghe et al., 2020, Env Res and Public Health)
- [The effects of alcohol warning labels on population alcohol consumption: An interrupted time series analysis of alcohol sales in Yukon, Canada](#), (Zhao et al., 2020, JSAD)
- [Alcohol Containers: A Consumer's Right to Know, a Government's Responsibility to Inform, and an Industry's Power to Thwart](#), (Stockwell et al., 2020, JSAD).

The findings from these supported the following conclusions:

- Prior to the introduction of the labels, significant majorities of consumers did not know a) alcohol caused cancer b) Canada's low risk drinking guidelines c) how many standard drinks were in alcohol containers they purchased;
- The colourful, well-designed labels were seen and recalled by most consumers;
- Consumers who saw the labels were more likely to report considering cutting down on their drinking and increased their support for alcohol policies;
- Compared with neighbouring areas, per capita alcohol consumption in Whitehorse, the intervention site, decreased by almost 7% during the intervention;
- Public support for the warning labels was high throughout the study.

The labels as outlined in the Draft Regulation are similar to the ones in The Yukon Labelling study, so would be an effective tool for informing drinkers of the risks of alcohol consumption.

2. *Fulfilling the duty to warn*

The Canadian Alcohol Policy Evaluation Project (CAPE), together with legal experts, [have also documented](#) how 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. Health warning 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:

- Communicated clearly and understandably and must be explicit
- 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
- Should not be neutralized or negated by collateral efforts on the part of the manufacturer.
- Be updated regularly in light of new scientific evidence of best practices and of alcohol-related harms.

The Draft Regulation meets the evidence-based criteria above to fulfil the duty to warn consumers.

We fully support the Draft Regulation in its current form.

Sincerely, the undersigned,

Timothy S. Naimi, MD, MPH

Director, Canadian Institute for Substance Use Research
Professor, School of Public Health and Social Policy
WHO/PAHO Collaborating Centre on Alcohol and Public Health Policy
University of Victoria

Adam Sherk, PhD

Scientist, Canadian institute for substance use research
WHO/PAHO Collaborating Centre on Alcohol and Public Health Policy
University of Victoria

Tim Stockwell, PhD Scientist, Canadian Institute for Substance Use Research

WHO/PAHO Collaborating Centre on Alcohol and Public Health Policy
Professor Emeritus, Department of Psychology
University of Victoria

Kate Vallance, MA

Research Associate, Canadian Institute for Substance Use Research
WHO/PAHO Collaborating Centre on Alcohol and Public Health Policy
University of Victoria

Jinhui Zhao, PhD

Scientist
Canadian Institute for Substance Use Research
WHO/PAHO Collaborating Centre on Alcohol and Public Health Policy
University of Victoria

Norman Giesbrecht, PhD

Emeritus Scientist
Institute for Mental Health Policy Research
WHO/PAHO Collaborating Centre in Addiction and Mental Health
Centre for Addiction and Mental Health
Adjunct Professor
Dalla Lana School of Public Health, University of Toronto

Ashley Wettlaufer, MA

Research Methods Specialist, Institute for Mental Health Policy Research
WHO/PAHO Collaborating Centre in Addiction and Mental Health
Centre for Addiction and Mental Health



**University
of Victoria**

Canadian Institute
for Substance
Use Research

Institut canadien
de recherche sur
l'usage de substances

camh
Centre for Addiction and Mental Health