

October 3, 2022

Hon. Jean-Yves Duclos
Minister of Health
House of Commons
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Hon. Carolyn Bennett
Minister of Mental Health and Addictions
House of Commons
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Dear Ministers Duclos and Bennett,

Re: Public interest in creating a Federal Alcohol Act including labels with health warning, guidelines on alcohol and health, number of standard drinks, and nutrition information being required on alcohol containers sold in Canada

The Public Health Association of New Brunswick and Prince Edward Island (PHA-NBPEI) members believe in universal and equitable access to the basic conditions that are necessary to achieve health for all. The Branch's mission is to advocate for the improvement and maintenance of personal and community health according to the public health principles of disease prevention, health promotion and protection, and healthy public policy. As a volunteer-run organization of professionals working in various fields related to public and population health seeking to continuously prevent alcohol related harm and create better health outcomes, PHA-NBPEI is focused on eliminating preventable causes of illness and injury. PHA-NBPEI plays a key role in advocating for evidence-based healthy public policies that will help to create vibrant and healthy communities. A Federal Alcohol Act which includes mandatory alcohol warning labels is integral to reducing alcohol related harm and improving the health outcomes of New Brunswick and Prince Edward Island populations.

On behalf of PHA-NBPEI, I am writing to express support for the recommendation in the Canadian Centre on Substance Use and Addictions' proposed new Low Risk Alcohol Drinking Guidelines (also referred to as the [Canadian Guidance on Alcohol and Health](#)) that Health Canada:

[“require, through regulation, the mandatory labelling of all alcoholic beverages to list the number of standard drinks in a container, the Guidance on Alcohol and Health, health warnings and nutrition information.”](#)

This recommendation comes from leading scientific experts in the field and Canadians have the right to know about the adverse health risks of consuming alcohol, especially given that it is classified by the WHO as a Class 1 carcinogen.

Currently, Canada has Federal Acts for Tobacco and Vaping Products and Cannabis. Commonly stated in the defined purpose of these Acts is to protect the health of young persons by restricting access, protecting from inducements, to prevent the public from being deceived or misled with respect to health hazards, and to enhance public awareness about the hazards.

We at PHA-NBPEI, call on the Government of Canada to develop a Federal Alcohol Act, similar to the existing [Tobacco](#) and [Cannabis](#) Acts, in which alcohol labelling regulations can be developed and strengthened. An Alcohol Act with the purpose to protect public health and prioritize children's rights considering the conclusive evidence outlining alcohol related harms.

[Canadian researchers](#), including [legal experts](#), have 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 decision concerning use of the product. Alcohol products are currently being distributed and sold, often by government agencies, to Canadian consumers without any standardized or evidence informed warnings of the related risks.

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 should meet the following criteria:

- 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.
- Remain current in light of scientific developments
- Warn consumers of new risks

The [Canadian Alcohol Policy Evaluation \(CAPE\) Project](#) research team, who have been leaders in the alcohol policy field for over 10 years, have compiled a guidance document on [Evidence-based Recommendations for Labelling Alcohol Products in Canada](#). Their recommendations include:

- Introduction of 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
- 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 images
- Nutrition information in the form of a mandatory simplified nutrition facts table with calorie content should be provided on all alcohol products

Further, the findings of [the Yukon Labelling Study](#), one of the best-known studies on the effectiveness of alcohol warning labels, showed that alcohol labels led to an increase in [consumer](#)

[awareness and knowledge of health risks](#), [number of standard drinks in alcohol containers](#), and [national drinking guidelines](#) which [led to a decrease in alcohol consumption](#). This is the first (and so far only) real-world study on the effectiveness of alcohol warning labels in informing drinkers of the risks of alcohol and reducing consumption. The results of the study support the call to implement mandatory health information on alcohol containers in Canada. Several academic papers have been published on the study and are available [here](#).

[Tobacco](#) and [cannabis](#) products, two other legally regulated psychoactive substances, are already subject to mandatory warning labels and governed by Federal Acts. It is time that the Government of Canada, without interference from the alcohol industry, do the same with alcohol, a drug that cost Canada [\\$16.6 billion](#) and was responsible for more than 18,000 deaths in 2017 alone.

The advancement of public health policy is a key step toward reducing alcohol related harms and improving health outcomes.

Sincerely,



CC: Jennifer Saxe
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