

Digby and Area Community Health Board
Maureen Langsford, Chair
Notification of Draft Regulations Under Section 12 of the Public Health (Alcohol) Act 2018
TRIS NOTIFICATION 2022/441/IRL (Ireland)

Who we are

The Digby and Area Community Health Board is composed of volunteers located around Digby, Nova Scotia, Canada.

Community Health Boards work together to improve health & wellness where we live, work, play and learn. They gather ideas and share information about how to improve and promote health & wellness close to home. They focus on the many factors that affect health & wellness in our communities including income, education and sense of belonging, among others. CHBs share what they have learned about health & wellness priorities with Nova Scotia Health, IWK Health Centre, and community groups, as outlined in the [Health Authorities Act, Section 62](#)).

CHBs advocate for actions to promote and improve health & wellness based on what communities say is most important. Guided by their Community Health Plans, they develop partnerships with local community groups and they award Wellness Fund grants to local community projects.

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 position

We are writing to express support for the Draft Regulation. There is clear evidence that such 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, are an effective way to inform Irish consumers of the potential risks of alcohol consumption.

1. Alcohol harms

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, four people in Ireland die every day from an alcohol-related cause.

2. Effective, evidence-based labels

The Draft Regulation is supported by robust research. In Canada, researchers at [the Canadian Alcohol Policy Evaluation Project](#) (CAPE), who have been leaders in the alcohol policy field for 10 years, have compiled a report on [Evidence-based Recommendations for Labelling Alcohol Products](#). Their 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.
- 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.

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

Canada is also home to 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 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. 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)
- [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, \(Zhao et al., 2020, JSAD\)](#)

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.

3. Fulfilling the duty to warn

Researchers at the Canadian Alcohol Policy Evaluation Project (CAPE), including 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
- 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

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,

Maureen Lansford, Chair

maureen.langsford@gmail.com