



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

E-mail: admin@opha.on.ca

www.opha.on.ca

President

Lisa Demaline

E-mail: ldemaline@opha.on.ca

Executive Director

John Atkinson

E-mail: jatkinson@opha.on.ca

Constituent Societies

Association of Ontario Health Centres (AOHC)

Association of Public Health Epidemiologists in Ontario (APHEO)

Association of Supervisors of Public Health Inspectors of Ontario (ASPPIO)

Canadian Institute of Public Health Inspectors - Ontario Branch (CIPHIO)

Community Health Nurses' Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public Health Dentistry (OAPHD)

Ontario Association of Public Health Nursing Leaders (OAPHNL)

Ontario Dietitians in Public Health (ODPH)

Ontario Society of Physical Activity Promoters in Public Health (OSPAPPH)

*Charitable Registration
 Number 11924 8771 RR0001*

Hon. Jean-Yves Duclos
 Minister of Health
 House of Commons
 Ottawa, Ontario, Canada K1A 0A6
hccminister.ministresc@hc-sc.gc.ca

Hon. Carolyn Bennett
 Minister of Mental Health and Addictions
 House of Commons
 Ottawa, Ontario, Canada K1A 0A6
mhaminister.ministresmd@hc-sc.gc.ca

September 22, 2022

Dear Ministers Duclos and Bennett,

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

OPHA has established a strong record of success as a voice of public health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

The Ontario Public Health Association (OPHA) is writing to express support for the recommendation in the Canadian Centre on Substance Use and Addictions' proposed new Low Risk Alcohol Drinking Guidelines (aka [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;
- Recognizes Canadians' right to know about the adverse health risks of consuming alcohol that is classified by the World Health Organization as a [Group 1 carcinogen](#). Governments have an obligation to inform regarding health and safety risks of products available for sale, especially when they are directly involved in their distribution and retail;

- Makes it easier for people living in Canada to make informed, healthier choices and lower risk of chronic diseases. 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](#) and [led to a decrease in alcohol consumption](#);
- Provides clear and easy access to information on a product that is [consumed by 66%](#) (or nearly 21 million people) of Canadians aged 15 or older;
- Contributes to Government of Canada's top priorities: [Health Canada Healthy Eating Strategy](#) and is an important consideration for improvements to [food labelling](#);
- [Has been shown to have public support](#); and
- Would be consistent in application to other similar products like [tobacco](#) and [cannabis](#) which are already subject to mandatory warning labels and governed by federal Acts.

OPHA and its members have been in support of alcohol warning labels since 1996. [OPHA asserts](#) that:

1. Existing legislation does not adequately recognize alcohol as a drug, or indeed, as a product that is clearly associated with significant risk to public health and safety.
2. Any agent responsible for the manufacture, distribution, promotion, and sale of alcohol has a moral duty and a social responsibility to warn the public of the potential harm associated with its products.
3. Consumers have a right to know what constitutes "responsible consumption", the potential consequences of use and where to go for assistance.

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
- Keep abreast 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 pictorials.
- Nutrition information in the form of a mandatory simplified nutrition facts table with calorie content should be provided on all alcohol products.

Alcohol was responsible for more than 18,000 deaths in 2017 in Canada, with costs amounting to an estimated \$17 billion annually in health care, lost productivity, criminal justice, and other direct costs, far exceeding the monetary benefits from its sale. Alcohol is no ordinary food product like milk or bread and its labelling requirements should match and even exceed other food product labelling. It is a drug that comes with inherent health risks and causes significant harm, even at lower levels of consumption. OPHA calls on Health Canada to require, through regulation, the mandatory labelling of all alcoholic beverages and for this to be done within a federal Alcohol Act, similar to the existing [Tobacco](#) and [Cannabis](#) Acts.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Atkinson', with a long horizontal flourish extending to the right.

John Atkinson, Executive Director

Cc: Jennifer Saxe, Director-General, Controlled Substances Directorate, Health Canada
Ian Culbert, Executive Director, Canadian Public Health Association