

June 9, 2023

Hon. Jean-Yves Duclos
Minister of Health
House of Commons
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Hon. Carolyn Bennett
Minister of Mental Health and Addictions
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Re: Standard drink and health warning labels for alcohol containers sold in Canada

Dear Ministers Duclos and Bennett,

I am writing on behalf of my provincial/territorial Chief Medical Officer of Health colleagues to express our individual support for the recommendation from the updated national guidance on Alcohol and Health ([Canadian Guidance on Alcohol and Health](#)) that Health Canada develop regulations requiring standard drink and health warning labelling on alcohol products.

Currently, alcohol is sold to Canadian consumers with no mandated warnings. In contrast, both tobacco and cannabis products, two other legally regulated psychoactive substances, are already subject to mandatory warning labels and governed by federal Acts. These substances have less impact on economic costs and health service delivery compared with alcohol. Estimates from the Canadian Substances Use Costs and Harms Project show that the cost of alcohol consumption in Canada was \$19.67 billion in 2020 and is therefore the substance that incurs the greatest cost overall.

Many leading experts in Canadian health and legal research communities have argued that manufacturers of consumer products have a duty to warn the public of risks inherent in the use of their products and to provide consumers with the information they need to make informed choices concerning the use of their products. This is based on the fundamental right for Canadians to have the knowledge they need to protect themselves from harm where possible. This is particularly important for substances which are marketed and sold for human consumption and have a wide range of significant potential harms, such as alcohol. It is well established that alcohol use increases risk of a range of health and social harms such as injuries, violence, heart disease, stroke, and seven types of cancer. As well, for people to adhere to the updated Guidance on Alcohol and Health, consumers need consistent, easy-to-use information on alcohol containers to accurately track and monitor their alcohol use in terms of standard drinks.

Furthermore, the findings of the [Yukon labelling study](#) showed that alcohol warning labels led to an increase in consumer awareness and knowledge of health risks, standard drink size, and 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 labelling on alcohol containers in Canada.

Evidence-based recommendations for alcohol warning labels from the Canadian Alcohol Policy Evaluation team 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 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 colors, and supporting pictorials

It is our collective recommendation that the Government of Canada develop alcohol labelling regulations as part of a federal *Alcohol Act*, similar to the existing Tobacco and Cannabis Acts. Under the *Food and Drugs Act*, the Government has the authority to move forward with alcohol labelling immediately through an amendment (i.e., Bill S254: *An Act to amend the Food and Drugs Act*)

Achieving goals related to reducing alcohol use and harms cannot be done without effective alcohol public policy. Moving forward on alcohol product labelling would be an important first step.

Sincerely,



Dr. Jennifer Russell BA, BSc, MD, CCFP

Chief Medical Officer of Health | Médecin-hygiéniste en chef

CC:

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