



Canadian Cancer Society  
Société canadienne du cancer

October 4, 2023

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The Honourable Mary Ng, P.C., M.P.  
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**Re: Canadian position on Ireland's Public Health (Alcohol) Act and related labelling regulations in World Trade Organization Technical Barriers to Trade Committee**

Dear Ambassador, Dear Minister:

As the country's largest national charitable funder of research into all types of cancer, the Canadian Cancer Society (CCS) works tirelessly to save and improve lives. CCS advocates for evidence-informed public policies that help create vibrant and healthy communities by preventing cancer and better supporting those living with the disease.

**We wish to bring to your attention that fact that alcohol is classified as a [Group 1 carcinogen by the International Agency for Research on Cancer](#) and is estimated to be one of the [top 3 causes of cancer deaths worldwide](#).** Drinking any type of alcohol – beer, wine, or spirits – increases your risk of at least 9 different types of cancer including breast, colorectal, esophageal, laryngeal, liver, mouth, pharyngeal, stomach and pancreatic cancers. Studies show that many people are unaware that alcohol consumption increases the risk of cancer despite the World Health Organization (WHO) classifying it as a carcinogen over 30 years ago. Furthermore, evidence indicates that regular alcohol consumption over time – even at low levels – increases the risk of developing alcohol-associated cancer. [According to the WHO](#), there is [no safe threshold](#). Warning labels on alcohol products can help inform the public about the risks of alcohol consumption, including cancer risks. Along with continued education, alcohol labelling will ensure that more people can make informed decisions for their health.

*Our statement*

**We support Ireland's Public Health (Alcohol) Act and implementing regulations and urge the Canadian Government NOT to oppose the new labelling requirements in the World Trade Organization's (WTO) Technical Barriers to Trade (TBT) Committee**, thereby respecting Ireland's authority to enact new alcohol labelling requirements, including a cancer warning statement. Canada should not undermine this scientifically sound, publicly supported, public health policy that was enacted by democratically elected officials in Ireland.



Consumers have a right to know about risks to their health from drinking alcohol and should be provided critical information about the contents of alcohol products relevant to their health and safety.

Continued objections from Canada and other countries could delay the implementation of alcohol warning labels in Ireland, thereby failing to curb preventable alcohol harm and cancer deaths in the country. Such objections also risk eroding Canada’s credibility on the global stage and undermine public health efforts in our own country.

### *Background on alcohol labelling in Ireland*

On May 22, 2023, Ireland’s Minister for Health, Stephen Donnelly, signed into law [Section 12 of the Public Health \(Alcohol\) Act 2018](#) which requires alcohol products being sold in Ireland to have health information labels. These regulations ensure that no alcohol product can be sold without bearing a warning that displays:

- (I) “Drinking alcohol causes liver disease”
- (II) A health symbol intended to inform the public of the danger of alcohol consumption when pregnant, and
- (III) “There is a direct link between alcohol and fatal cancers.”

In addition, the regulations make it mandatory that the alcohol, and calorie, content within the product is stated, and that the public health alcohol information website ‘askaboutalcohol.ie’ is displayed.

Similar notices will also have to be placed in licensed premises.

At the WTO TBT Committee [meeting](#) on June 21, 2023, [Canada supported](#) the United States, Mexico, and the Dominican Republic in their concerns regarding Ireland’s legislation on alcohol labelling because of its potential to create a barrier to trade. The primary objection was that exporters would be required to produce labels specific to the Irish market. However, this was unfounded as a European Union (EU) representative confirmed that alcohol labels could be placed on products after they are imported into Ireland, thus removing any burden on the exporter.

As WTO discussions continue, it is important that the alcohol industry not be allowed to use TBT Committee meetings to [delay and undermine effective public health efforts to prevent alcohol’s harms](#), including labelling.

### *Alcohol labelling is an effective, evidence-based public health measure*

There is increasing evidence that labels containing information about alcohol content, calories and health harms, including cancer risks, are an effective way to empower consumers to make informed decisions about their health.

Research from the Canadian Institute for Substance Use Research (CISUR) and the Centre for Addiction and Mental Health (CAMH) supports alcohol labelling. For the last 10 years CISUR and CAMH have led the [Canadian Alcohol Policy Evaluation](#) (CAPE) project, a nation-wide initiative funded by the federal government to define and monitor the implementation of effective alcohol policies. Ireland’s alcohol labelling is consistent with CAPE’s [Evidence-based Recommendations for Labelling Alcohol Products](#).



With Public Health Ontario, CISUR also 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 real-world study of the effectiveness of alcohol warning labels in informing people of the risks of alcohol and reducing consumption. The findings from this study supported the following conclusions:

- Prior to the introduction of the labels, most consumers did not know a) alcohol increases the risk of cancer b) Canada's low risk drinking guidelines c) how many standard drinks were in the 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.

Ireland's proposed alcohol labels are consistent with those used in the Yukon Labelling Study; an effective tool for informing people of the risks of alcohol consumption.

#### *Alcohol labels fulfil the duty to inform consumers*

With legal experts, CAPE [has also outlined](#) manufacturers' duty to inform consumers about the risks associated with, and provide the necessary information for them to make informed decisions about, the products they use. While there are no doubt legal variations between Canada and Ireland, the principle is the same: Producers of alcoholic beverages have a duty to inform consumers about the health hazards associated with their product, especially when such risks are poorly understood by the public. In fact, a [class action lawsuit](#) has recently been filed in Quebec against the Société des alcools du Québec, the government alcohol retailer, for their failure to adequately inform consumers of the risks of the alcohol products being sold. The warning labels being implemented in Ireland meet the evidence-based criteria to fulfil the duty to inform consumers. Consumers have a right to know about alcohol's health harms, and warning labels will provide consumers with that right.

It is important to note that this information must be placed directly on alcohol containers. Quick response (QR) codes are an ineffective means to share information with consumers. A [recent study](#) corroborated the results of past work on customers' use of QR codes, demonstrating that "despite the availability of prominently displayed QR codes, the overwhelming majority of customers did not make use of the QR codes to obtain information on alcohol-related harms." Evidence indicates that providing online access to information through QR codes will fail to reach most consumers.

#### *Misconceptions about alcohol labelling*

Many myths about alcohol labels have been, or may be, raised at WTO TBT Committee meetings. In response to these misconceptions, a group of Canadian researchers published a [commentary](#) outlining why people in Canada deserve mandated health and standard drink information labels on alcohol



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containers. [Table 3](#) of this commentary uses scientific evidence to debunk common myths around alcohol warning labels to illustrate that labels are effective, long-standing scientific evidence does support health claims of alcohol causing cancer, and changing labels and incorporating colourful warnings and health information is not cost-prohibitive for manufacturers.

It is also worth noting that members of the alcohol industry have proposed voluntary labelling in place of mandated labelling. It is important to understand that such industry self-regulation is ineffective. In Australia, where an alcohol industry-led organization initiated voluntary labelling, [less than half of alcoholic beverages actually contained the relevant information](#). In [New Zealand](#), industry-led labelling resulted in small labels and textual information that was difficult to visually distinguish from the background. There is also significant evidence of [alcohol industry interference in the implementation of evidence-based warning labels](#), including during the alcohol labelling study in Yukon.

### *Conclusion*

**In conclusion, we are calling on the Canadian Government to put public health before corporate interests by supporting and respecting Ireland's authority to enact alcohol labelling requirements, including a cancer warning statement. We are calling on the Canadian Government NOT to oppose the new labelling requirements in the WTO's TBT Committee.** In doing so, Canada can help to prevent future deaths and harms from alcohol use in Ireland, and ultimately support evidence-based public health efforts in our own country.

The science is clear, and Canadians agree, [warning labels are a wanted and needed public health intervention](#) that can effectively inform consumers about the health risks of alcohol. Governments in both Canada and Ireland have not yet fulfilled their duty to provide this information.

At CCS, we are interested in reducing alcohol harm through policies and would greatly appreciate the opportunity to discuss this with you further. Please contact Ciana Van Dusen, Advocacy Manager of Prevention at [ciana.vandusen@cancer.ca](mailto:ciana.vandusen@cancer.ca) to organize a meeting. We look forward to hearing from you.

Sincerely,

Andrea Seale  
Chief Executive Officer  
Canadian Cancer Society

Email CC:

Hon. Mark Holland  
Minister of Health  
House of Commons



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