

## Irish Cancer Society

### *Submission re notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018*

**22 September 2022**

#### Irish Cancer Society

The work of the Irish Cancer Society spans the cancer pathway, from healthy living to catching cancer early and treatment through to supporting people in survivorship, and at end-of-life.

The Irish Cancer Society supports the implementation of Section 12 of the Public Health (Alcohol) Act, 2018 as a measure to raise awareness of the risks associated with alcohol use and ensuring that consumers can make informed choices about their alcohol use.

#### Public Health (Alcohol) Act 2018 – Ireland

In 2018, the Public Health (Alcohol) Act was introduced in Ireland,<sup>1</sup> and elements of the legislative framework have since been implemented, including measures on minimum unit pricing<sup>2</sup> and the structural separation of alcohol products in retail outlets<sup>3</sup>. Section 12 of the Public Health Alcohol Act, 2018 makes provisions for the labelling of alcohol products and notices in licensed premises.<sup>4</sup> Under this provision, labels on alcohol products would include information informing the public of the link between alcohol and cancer, the dangers of alcohol consumption generally and when pregnant in addition to other information such as quantity of grams of alcohol and energy value in the product.<sup>5</sup>

The Government of Ireland notified the European Commission of Draft Regulations under Section 12 of the Public Health (Alcohol) Act 2018 in 2022.

#### European Union

The European Commission has recognised the importance of reducing harm of alcohol use, ensuring that consumers are informed to make healthy decisions and in recognising the need reduce key risk factors for cancer, including alcohol use.

#### *Reducing alcohol related harm*

In 2006, the European Union developed its Strategy to support member states in reducing alcohol related harm, recognising that member states would adopt measures which would be based in their specific cultural contexts.<sup>6</sup> Aim 7 of the Strategy was designed to provide ‘information to consumers to make informed choices.’<sup>7</sup> The Strategy also made reference to measures undertaken by member states which improve consumer information ‘on the impact of alcohol abuse on health and work

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<sup>1</sup> Public Health (Alcohol) Act 2018 (Ireland). Available [here](#)

<sup>2</sup> Health Service Executive. 2021. “Minimum Unit Pricing on Alcohol – what is it and what will it mean for me?” 25 May. Available [here](#)

<sup>3</sup> Doyle, Anne (2021) Most recent regulations of Public Health (Alcohol) Act 2018 implemented. Drugnet Ireland, Issue 77, Spring 2021, pp. 15-17.

<sup>4</sup> Public Health (Alcohol) Act 2018 (Ireland), Section 12. Available [here](#)

<sup>5</sup> Ibid

<sup>6</sup> Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions An EU strategy to support Member States in reducing alcohol related harm {SEC(2006) 1358} {SEC(2006) 1360} {SEC(2006) 1411} /\* COM/2006/0625 final \*/

<sup>7</sup> Ibid.

performance' either at the point of sale or on the products, such as labelling for the attention of pregnant people.<sup>8</sup>

### *Mandatory labelling*

In 2017, the European Commission delivered a report to the Parliament and the Council regarding the mandatory labelling of the list of ingredients and the nutrition declaration of alcoholic beverages. The report recognised that providing information on items like ingredients and nutrition declaration support people in making healthy and informed decisions.<sup>9</sup> In this report, the Commission did not identify 'objective grounds that would justify the absence of information on ingredients and nutrition information on alcoholic beverages or a differentiated treatment for some alcoholic beverages.'<sup>10</sup>

### *Europe's Beating Cancer Plan*

Europe's Beating Cancer Plan (BCP) recognises the harms of alcohol use, outlining that 3 in 10 (29%) alcohol-attributable deaths are related to cancer.<sup>11</sup> The document also outlines the need to improve health literacy around risk factors and determinants for cancer as well as reducing harmful alcohol use.<sup>12</sup> A range of measures are identified which could reduce harm through alcohol use, including the European Commission's intention to review policy to include health warnings on alcoholic beverage labels by the end of 2023.<sup>13</sup>

### *World Health Organization*

Addressing harmful alcohol use should be seen as a public health priority, setting out a recommendation for warning labels on alcoholic beverages.<sup>14</sup> The WHO highlights that such warnings would serve to raise awareness amongst consumers of the health risks associated with alcohol use, noting that health warnings are currently provided on tobacco products.<sup>15</sup> Such an intervention should be accompanied by monitoring and evaluation practices.<sup>16</sup>

### *The case for labelling*

#### *Alcohol related harm*

Alcohol is a modifiable risk factor, either partially or wholly attributable to a number of diseases.<sup>17</sup> There is clear evidence of the harms of alcohol use, including cancer, cardiovascular disease, injuries,

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<sup>8</sup> Ibid.

<sup>9</sup> Report from the Commission to the European Parliament and the Council regarding the mandatory labelling of the list of ingredients and the nutrition declaration of alcoholic beverages. Com(2017) 58 final. Brussels, 13.3.2017

<sup>10</sup> Ibid.

<sup>11</sup> Europe's Beating Cancer Plan. Communication from the Commission to the European Parliament and the Council. Available [here](#)

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

<sup>14</sup> World Health Organization. 2012. "European action plan to reduce the harmful use of alcohol 2012-2020." Copenhagen: WHO Regional Office for Europe.

<sup>15</sup> World Health Organization. 2020. "Alcohol and cancer in the WHO European Region: an appeal for better prevention." Copenhagen: WHO Regional Office for Europe. Licence: CC BY-NC-SA 3.0 IGO

<sup>16</sup> Ibid.

<sup>17</sup> Roswall N, Weiderpass E. Alcohol as a risk factor for cancer: existing evidence in a global perspective. J Prev Med Public Health. 2015 Jan;48(1):1-9. doi: 10.3961/jpmph.14.052. Epub 2015 Jan 27. PMID: 25652705; PMCID: PMC4322512;

World Health Organization. 2021. Alcohol is one of the biggest risk factors for breast cancer. Available [here](#); O'Dwyer C, Mongan D, Doyle A and Galvin B. 2021. "Alcohol consumption, alcohol-related harm and alcohol policy in Ireland." HRB Overview Series 11. Dublin: Health Research Board.

alcohol dependency, liver disease, etc.<sup>18</sup> The Health Research Board in Ireland found that there was an average of 3 alcohol-related deaths per day in 2017.<sup>19</sup>

Unfortunately, the general public is not always aware of the recommended level of consumption, for instance 1 in 10 (9%) people could identify the recommended weekly maximum number of standard drinks.<sup>20</sup> Furthermore, a person's actual drinking behaviours do not always align with their perception of their drinking behaviours. In Ireland, while over half of all drinkers' alcohol use is classified as hazardous, approximately 73.5% would consider that they are light or moderate drinkers.<sup>21</sup> Only 2.6% reported that they were a heavy drinker.<sup>22</sup>

#### *Alcohol is a risk factor for cancer*

Alcohol is linked to a number of types of cancer such as colorectal, liver, breast, oesophagus, larynx, oropharynx and oral cavity.<sup>23</sup> In 2020, 4% of cancers were attributable to alcohol use globally.<sup>24</sup> In Ireland, 1,000 new cancer cases diagnosed are attributable to alcohol (approximately 3.9%).<sup>25</sup> Across Europe, rates of cancers attributable to alcohol use range between 3.6% (Southern Europe) and 5.6% (Central and Eastern Europe).<sup>26</sup>

Yet, there is little public awareness of the cancer risks associated with alcohol. For instance, a Healthy Ireland survey showed that the majority of people could not identify the link between alcohol use and cancers of the bowel (37.7% identified the link) and breast (21.2% identified the link).<sup>27</sup> In the UK, only around 1 person in 10 was aware of the link between alcohol and cancer.<sup>28</sup>

#### *Public support for labelling*

A survey undertaken by the National Cancer Control Programme (NCCP) in Ireland revealed that almost 2 in 5 people (37%) did not agree that (even moderate) alcohol consumption increases the risk of cancer, with 9 in 20 people (45%) incorrectly believing that only the consumption of alcohol in large amounts over a long period of time could cause cancer.<sup>29</sup>

Nonetheless, people show support for including health related information on the labels on cans and bottles containing alcohol. To illustrate, in Ireland the public indicated strong support for the following information on labels:<sup>30</sup>

- *Alcohol strength (98%)*

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<sup>18</sup> O'Dwyer C. et al. 2021.

<sup>19</sup> O'Dwyer C. et al. 2021.

<sup>20</sup> Ipsos MRBI. 2012. Alcohol: public knowledge, attitudes and behaviours. Dublin: Health Research Board. Available [here](#)

<sup>21</sup> O'Dwyer C. et al. 2021.

Health Research Board. 2021. "New HRB overview presents latest research on alcohol consumption, harm and policy in Ireland." 15 April. Available [here](#)

<sup>22</sup> O'Dwyer C. et al. 2021.

<sup>23</sup> World Health Organization. 2020.;

Rumgay, H., Shiell, K., Charvat, H., Ferrari, P., Sornpaisarn, B., Obot, I., Islami, F., Lemmens, V. E. P. P., Rehm, J., Soerjomataram, I. 2021. "Global burden of cancer in 2020 attributable to alcohol consumption: a population-based study." The Lancet Oncology. Volume 22, Issue 8.

<sup>24</sup> Rumgay, H. et al. 2021.

<sup>25</sup> Supplementary appendix (published online [here](#) July 13) to Rumgay, H. et al. 2021.

<sup>26</sup> Ibid.

<sup>27</sup> O'Dwyer C. et al. 2021.

<sup>28</sup> Buykx, P. et al. 2015. 'An Investigation of Public Knowledge of the Link between Alcohol and Cancer.' Available [here](#)

<sup>29</sup> IPSOS, National Cancer Control Programme, Health Service Executive. 2022. "National Survey on Cancer Awareness and Attitudes." September. Available [here](#)

<sup>30</sup> Ipsos MRBI. 2012.

- *Alcohol related harms (95%)*
- *Ingredients (91%)*
- *Number of calories (82%)*

Research by Cancer Research UK and the University of Sheffield carried out showed almost 7 in 10 people (67%) either supported or strongly supported health warnings on alcohol containers advising that alcohol can harm your health, with only 9% opposed to the measure.<sup>31</sup> Sixty-four per cent either supported or strongly supported messaging advising that alcohol increases the risk of cancer, with only 10% opposed.<sup>32</sup>

#### *Labelling raises consumers' awareness*

Findings from a national online survey implemented in Australia (approximately 1,600 participants) indicated that including warnings on the cancer risk associated with alcohol use would enhance awareness amongst the public.<sup>33</sup> Another online survey undertaken in Australia found that there was a neutral to favourable response to statements outlining a link between alcohol use and cancer.<sup>34</sup>

A real world experiment from Yukon, Canada demonstrated that labels outlining the cancer risks associated with alcohol use were noticed by consumers and raised their awareness of alcohol-associated risks. However, it appears that knowledge is dependent on the intervention (i.e. warning on labels) as consumers' recall of the cancer risks associated with alcohol use decreased 6 months after warnings were removed from labels.<sup>35</sup> A recent rapid review of the evidence has shown that warning labels on alcoholic beverages serve to increase people's awareness of the risks of consuming alcohol, and that there is real support for such measures amongst the public.<sup>36</sup>

The use of health warnings on product labels is not new. For example, France was the first European Union member state to ensure that a text or pictorial warning be included on the label of alcoholic beverages to inform people of the danger of drinking alcohol during pregnancy.<sup>37</sup> Furthermore, tobacco products have carried health warnings relating to cancer and non-communicable diseases for a number of years and since their introduction have enhanced awareness of the harms to health. One in 5 smokers in the European Union referenced the health warnings as a reason for smoking less and in helping to quit.<sup>38</sup>

## Conclusions

Alcohol use has a detrimental impact on a person's health, with a clear link to a number of different cancer types. Yet, many people are unaware of the specific risks associated with alcohol use. It is essential to improve health literacy among the general population, to ensure that people who buy

<sup>31</sup> Buykx, P. et al. 2015.

<sup>32</sup> Buykx, P. et al. 2015.

<sup>33</sup> Miller et al. (2016) "Message on a bottle: are alcohol warning labels about cancer appropriate?" *BMC Public Health*, BMC series.16:139.

<sup>34</sup> Pettigrew, S., Jongenelis, M., Chikritzhs, T. et al. 2014. "Developing cancer warning statements for alcoholic beverages." *BMC Public Health* 14, 786

<sup>35</sup> Hobin, E., Weerasinghe, A., Vallance, K., Hammond, D., McGavock, J., Greenfield, T. K., Schoueri-Mychasiw, N., Paradis, C., & Stockwell, T. 2020. "Testing Alcohol Labels as a Tool to Communicate Cancer Risk to Drinkers: A Real-World Quasi-Experimental Study." *Journal of Studies on Alcohol and Drugs*. 81:2, 249-261

<sup>36</sup> Giesbrecht, N., Reisdorfer, E., Rios, I. 2022. "Alcohol Health Warning Labels: A Rapid Review with Action Recommendations." *Int. J. Environ. Res. Public Health* 19, 11676.

<sup>37</sup> World Health Organization. 2017. "Alcohol labelling: A discussion document on policy options." Copenhagen: WHO Regional Office for Europe. Licence: CC BY-NC-SA 3.0 IGO

<sup>38</sup> Hammond, D. 2011. "Health Warning Messages on tobacco products: a Review." *Tobacco Control*. September 20(5):327-37

alcoholic beverages have the right information available to them at the point of sale or use of such products. Warning labels on alcoholic beverages will inform a person of the health risks of consuming alcohol, particularly relating to cancer risk.

The European Union's Beating Cancer Plan outlined the need to engage in prevention and outlined its intention to review policy to include health warnings on alcoholic beverage labels before the end of 2023.<sup>39</sup> The World Health Organization recommended the use of warning labels on alcoholic beverages to inform of the harms of alcohol use.<sup>40</sup>

On the basis of supporting people to make informed decisions about their health and the risks associated with alcohol use, and towards reducing the global cancer burden of which alcohol is a risk factor, the Irish Cancer Society supports the use of warnings on labels of alcoholic beverages. We support the implementation of Section 12 of the Public Health (Alcohol) Act, 2018.

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<sup>39</sup> Europe's Beating Cancer Plan. Communication from the Commission to the European Parliament and the Council. Available [here](#)

<sup>40</sup> World Health Organization. 2012.