

CPME Contribution to the TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.¹

CPME reaffirms its commitment to contributing to the fight against alcohol-related harm and supports the full implementation of the Public Health (Alcohol) Act 2018 in Ireland, which includes, among other mandatory measures, on-product health warnings and information on gram and calorie content for alcohol products, as well as in-premises for all on-licensed premises.

Alcohol – A Major Public Health Issue

Alcohol consumption is directly associated with over 60 acute and chronic conditions ranging from accidents and alcohol poisoning to liver cirrhosis, certain cancers, cardiovascular disease and mental health disorders.

In terms of the health burden, the Global Burden of Disease attributed 5% of all death in the country to alcohol.² Other studies suggest that from 2008-2017, on average 3 deaths were reported per day in Ireland of alcohol-related causes.³

There is a proven, causal link between the consumption of alcohol and certain cancers including cancer of the mouth, pharynx, larynx, esophagus, liver, bowel, and female breast.⁴ For ill health, it ranks as the 7th leading global risk factor and was the cause of over 3 million deaths world in 2016.⁵ In terms of moderate consumption, there is an increased risk of blood pressure and stroke⁶, with irregular and chronic heavy drinking detrimental to

¹ CPME is registered in the Transparency Register with the ID number 9276943405-41. More information about CPME's activities can be found on www.cpme.eu.

² Collaborators, G.B.D. and Ärnlov, J., 2020. Global burden of 87 risk factors in 204 countries and territories, 1990–2019: a systematic analysis for the Global Burden of Disease Study 2019. *The Lancet*, 396(10258), pp.1223-1249.

³ Doyle, A., 2021. Alcohol consumption, alcohol-related harm, and alcohol policy in Ireland. *Drugnet Ireland*, pp.1-8.

⁴ Humans, I.W.G.O., 2010. Alcohol consumption and ethyl carbamate. IARC Monogr. Eval. Carcinog. Risks Hum, 96, pp.3-1383.

⁵ Gakidou, E., Afshin, A., Abajobir, A.A., Abate, K.H., Abbafati, C., Abbas, K.M., Abd-Allah, F., Abdulle, A.M., Abera, S.F., Aboyans, V. and Abu-Raddad, L.J., 2017. Global, regional, and national comparative risk assessment of 84 behavioural, environmental and occupational, and metabolic risks or clusters of risks, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. *The Lancet*, 390(10100), pp.1345-1422.

⁶ Millwood, I.Y., Walters, R.G., Mei, X.W., Guo, Y., Yang, L., Bian, Z., Bennett, D.A., Chen, Y., Dong, C., Hu, R. and Zhou, G., 2019. Conventional and genetic evidence on alcohol and vascular disease aetiology: a prospective study of 500 000 men and women in China. *The Lancet*, 393(10183), pp.1831-1842.

cardiovascular health.⁷ It is also linked with a broad range of mental health disorders, including depression⁸. In such cases, health risk steadily increases with greater volumes of alcohol consumption, illustrating a dose-dependent relationship.

Alcohol is also related to harm to individuals associated with the drinker including harm caused by alcohol consumption during pregnancy. It is estimated that 1 in 67 women who consume alcohol in pregnancy give birth to a baby with Foetal Alcohol Syndrome (FAS).⁹ Based on these calculations, an estimated 600 Irish babies are born each year with FAS, and more than 40,000 Irish people live with the condition.¹⁰

In Ireland, in 2020 Irish people aged 15 and over drank 10.07 litres of pure alcohol per capita.¹¹ Given that around 1 in 4 Irish people abstain from alcohol completely, this equates on average an individual drinking 574 pints of beer or 149 bottles of wine per year. This is particularly high also when compared to the OECD recorded per capita consumption of 9.1 litres and worldwide consumption of 6.2 litres.¹²

Alcohol-related harm is of even greater concern when high levels of heavy episodic drinking (binge drinking) is in addition to such volumes of alcohol consumption. In Ireland, research suggests that monthly and occasional binge drinkers accounted for 62% of all drinkers in Ireland.¹³

In addition, Ireland has the highest rate of alcohol consumption during pregnancy globally, with an estimated 60.4% of women consuming alcohol during pregnancy.¹⁴

Health Warnings

As demonstrated by the efficacy of health warnings on tobacco products internationally¹⁵, labelling of alcohol products with clear health warnings is an effective way of raising awareness of the health-related consequences of alcohol consumption. Research relating to displaying health warnings on tobacco products show that while small or obscure text-only

⁷ Rehm, J., Gmel Sr, G.E., Gmel, G., Hasan, O.S., Imtiaz, S., Popova, S., Probst, C., Roerecke, M., Room, R., Samokhvalov, A.V. and Shield, K.D., 2017. The relationship between different dimensions of alcohol use and the burden of disease—an update. *Addiction*, 112(6), pp.968-1001.

⁸ Boden, J.M. and Fergusson, D.M., 2011. Alcohol and depression. *Addiction*, 106(5), pp.906-914.

⁹ Popova S, Lange S, Probst C, Gmel G, Rehm J. **Estimation of national, regional, and global prevalence of alcohol use during pregnancy and fetal alcohol syndrome: a systematic review and meta-analysis.** *Lancet Glob Health* 2017; published online Jan 12. [http://dx.doi.org/10.1016/S2214-109X\(17\)30021-9](http://dx.doi.org/10.1016/S2214-109X(17)30021-9)

¹⁰ O'Mahony M. Prevention of Foetal Alcohol Spectrum Disorders, IMO AGM April 2017
[https://www.thelancet.com/journals/langlo/article/PIIS2214-109X\(17\)30021-9/fulltext](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(17)30021-9/fulltext)

¹¹ [Irish Revenue 2020 -Net Duty Paid Quantities](#)

¹² OECD/European Union (2020), *Health at a Glance: Europe 2020: State of Health in the EU Cycle*, OECD Publishing, Paris, <https://doi.org/10.1787/82129230-en>

¹³ Doyle, A., 2021. Alcohol consumption, alcohol-related harm, and alcohol policy in Ireland. *Drugnet Ireland*, pp.1-8.

¹⁴ Popova S, Lange S, Probst C, Gmel G, Rehm J. **Estimation of national, regional, and global prevalence of alcohol use during pregnancy and fetal alcohol syndrome: a systematic review and meta-analysis.** *Lancet Glob Health* 2017; published online Jan 12. [http://dx.doi.org/10.1016/S2214-109X\(17\)30021-9](http://dx.doi.org/10.1016/S2214-109X(17)30021-9)

¹⁵ Sambrook Research International, 2009. A review of the science base to support the development of health warnings for tobacco packages.

warnings seem to have little impact, more prominent health warnings on the face of tobacco products prove to be an effective source of health information. Similar health warnings have the potential to change consumer perceptions of alcohol products.^{16 17 18} Cancer warnings and warnings related to alcohol consumption during pregnancy have the potential to inform consumers of the long-term health impacts and encourage behavioural change.^{19 20} The multiplicity of warnings applied to various public education contexts are likely to have most impact²¹ and should be repeated across product labels, notices in licenced premises, websites selling alcohol and included in any advertisements for alcohol products.

Research on health warnings on tobacco products suggest that the most dominant visual element is brought to the attention of the consumer and then sequentially progresses to other elements in order of their visual dominance. Location on container, font, size, colour, use of imagery, clarity and memorability of message, and simplicity of language used are all useful elements in achieving a level of visual dominance required of an effective health warning.²²

Consumer's right to know

CPME believes that consumers have a right to know what they are drinking. The list of ingredients and the nutritional values declaration per 100 ml are essential information to help consumers to make more informed and healthier choices. The nutritional values declaration should be composed of energy value (kJ/kcal), fat (g), saturated fat (g), carbohydrates (g), sugars (g), proteins (g) and salt (g). For the greatest benefit, this information should be available directly and legibly on the label, not only online.

Providing comprehensible nutritional information such as energy content allows consumers to better monitor their diets and makes it easier for them to maintain a healthy lifestyle.²³

¹⁶ Al-hamdani M, Smith S. Alcohol warning label perceptions: Emerging evidence for alcohol policy. *Can J Public Health*. 2015 Oct 3;106(6):e395-400

¹⁷ D. Hammond, 'Health warning messages on tobacco products: a review' in *Tobacco Control*, Vol. 20, May 2011, pp. 327-337.

¹⁸ S. Glock and S. Krolack-Schwerdt, 'Changing Outcome Expectancies, Drinking Intentions, and Implicit Attitudes toward Alcohol: A Comparison of Positive Expectancy-Related and Health-Related Alcohol Warning Labels' in *Applied Psychology: Health and Well-Being*, Vol. 5, Issue 3, November 2013, pp. 332-347;

¹⁹ Pettigrew S, Jongenelis MI, Glance D et al. . The effect of cancer warning statements on alcohol consumption intentions. *Health Educ Res* 2016;31(1):60–9..

²⁰ S. M. Parackal, M. K. Parackal, and J. A. Harraway, 'Warning labels on alcohol containers as a source of information on alcohol consumption in pregnancy among New Zealand women' in the *International Journal on Drug Policy*, Vol. 21, Issue 4, July 2010, pp. 302-305;

²¹ Pettigrew S, Jongenelis MI, Glance D et al. . The effect of cancer warning statements on alcohol consumption intentions. *Health Educ Res* 2016;31(1):60–9..

²² Hammond, D., 2011. Health warning messages on tobacco products: a review. *Tobacco control*, 20(5), pp.327-337.

²³ WHO 2017 Alcohol labelling: A discussion document on policy options

Alcohol contains a considerable number of calories with an energy content of 7.1 kilocalories per gram.²⁴ Alcoholic beverages are also rich in sugar, which contains 4 kilocalories per gram, and frequently have added sugars. This may be unclear to consumers, if there is not sufficient information on the label.

CPME believes that labels should be considered an important part of a comprehensive strategy to provide information and educate people to prevent and reduce alcohol-related harm.

Recommendations

CPME believes that labels should be considered an important part of a comprehensive strategy to provide information and educate people to prevent and reduce alcohol-related harm.

CPME supports the right of national governments to take initiatives to increase public health by including additional labelling information. This may include information on allergens but also different health warnings, for example on legal age limits, drinking during pregnancy, drinking and driving, and the link to cancer and other diseases. It should be ensured that these warnings are legibly displayed next to the information on the ingredients and nutritional values.

CPME also supports the Irish government in adopting and implementing these mandatory measures in relation to alcohol in full, with on-product health warning and information for alcohol products, and in-premises for all on-licensed premises acting as a key initiative in range of policies that aim to reduce alcohol consumption and alcohol-related harm in Ireland.

²⁴ European Alcohol Policy Alliance 2018 What's in this drink? Eurocare's position on ingredients and nutritional information