**Norwegian Cancer Society’s contribution to the TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.**

The Norwegian Cancer Society (NCS) would like to provide our comments to the TRIS notification 2022/441/IRL of Draft Regulations Under Section 12 of the Public Health (Alcohol) Act 2018.

NCS is a nation-wide, non-profit voluntary organization. With 128 000 members, 27 000 volunteers and 190 employees the society is one of the largest organizations in Norway representing the voices of those affected by cancer.

NCS works continuously to improve the prevention and treatment of cancer and to ensure the best quality of life for people affected by cancer. Through research, preventive measures, information, support, advice and lobbying we fight cancer locally, nationally and globally.

NCS strongly supports the endeavour of the Irish government in implementing these mandatory measures in relation to alcohol with on-product health warnings and information for alcohol products.

**Rationale:**

Alcohol causes seven types of cancer (mouth, upper throat, larynx, oesophageal, breast, bowel, and liver) and there’s no safe lower limit (1). Based on that knowledge European Code against Cancer states that “If you drink alcohol of any type, limit your intake. Not drinking alcohol is better for cancer prevention.”

As a cancer society dedicated to prevent and control cancer, we need to increase the awareness of the link between alcohol and cancer and better address alcohol as a risk factor. Alcohol consumption is a major preventable risk factor for cancer, which in 2020 accounted for an estimated 181,000 cases of cancer within Europe(2).

Alcohol’s attributable contribution to cancer is not well recognised. Surveys(3) show that only 20-40 percent of the population in the Nordic countries are aware of the link. Our governments have a responsibility to make sure that consumers are aware of the carcinogenic risks of alcohol and implement evidencebased regulatory measures to reduce consumption and harm. More effective labelling is supported by the European Union and the World Health Organization. As part of the EU’s Beating Cancer Plan, there’s a proposal for EU regulations to require health warnings by the end of 2023. Introducing such labelling in Norway is a measure also included in the Norwegian Government's National Alcohol Strategy of 2020 and we strongly support the Irish government in this initiative.

An investigation carried out by the Norwegian Directorate of Health 2021 supports that warning labels can be an important means of increasing the population's knowledge of possible health damage from alcohol use.

There is no safe level of alcohol consumption for cancer and other NCDs. Cancer warnings have the potential to inform consumers of the long-term health impacts and encourage behavioural change (4). EU level regulation should reflect public support for mandatory ingredient, nutrition declaration and warning labels on alcohol products, so empowering properly informed consumer decisions and protect public health.

Well-designed health warnings on products have the potential to support a reduction in alcohol consumption and related harms such as future cancers. The Court of Justice of the European Union (‘CJEU’) has repeatedly confirmed that combating alcohol-related harm is an important and valid public health goal and health warnings on alcohol packaging as proposed in The Public Health Alcohol Act, 2018 is in our opinion clearly in accordance with EU Law and the alcohol industry`s tactic to make uncertainty whether the measure is legal or not cannot be heard. There is no doubt that the motivation for introducing this measure is to protect human health. The science is clear regarding alcohol as a class 1A carcinogen (highest classification of causality of cancer)(5). Based on common sense and a precautionary principle it is also reasonable to assume that health warnings are suitable in contributing to protect public health from the harms caused by alcohol.

Research from the tobacco field has documented that clear health warnings is an effective way of raising awareness of the health-related consequences (6) and work well to increase knowledge about health harms caused by the product itself. The measure is also necessary as there exist no other measures that will have an effect equivalent to that of label warnings: A general information campaign will for instance not be an alternative to health-warning labels, because a campaign will not help the consumer in action; at point of sale or when drinking alcohol.

Health warnings on alcohol packaging can help to capture attention, counteract the appeal and social acceptability of alcohol products, and may encourage consumers to think about their drinking. It is a broad package of measures that have an effect in the area of public health, and society must take a holistic view of products that harm public health. Accordingly, the health warnings on alcohol packaging as proposed in The Public Health Alcohol Act, 2018 is proportional and can therefore in any event be justified under the health exception which is included in EU Law.

**Conclusion**

We applaud and support Irish government in this progressive public health initiative. We also support the submissions from Alcohol Action Ireland and Eurocare.

**References:**

1. Burton, R. and Sheron, N., 2018. No level of alcohol consumption improves health. Lancet, vol. 392, n. 10152, pp. 987-988. Available from: <https://www.thelancet.com/article/S0140-6736(18)31571-X/fulltext>

2. Rumgay, H. et al., 2021. European burden of cancer in 2020 attributable to alcohol use. European Journal of Public Health, vol. 31, suppl. 3. Available from: <https://academic.oup.com/eurpub/article/31/Supplement_3/ckab164.857/6405090?login=true>

3. a. [Awareness of alcohol as a risk factor for cancer: A population-based cross-sectional study among 3000 Danish men and women - PMC (nih.gov)](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7356255/#:~:text=Unprompted%2C%2022.2%25%20of%20respondents%20were,between%20alcohol%20and%20breast%20cancer.)

b.[Näin Suomi juo : suomalaisten muuttuvat alkoholinkäyttötavat (julkari.fi)](https://www.julkari.fi/handle/10024/136800)

c.[alcohol-and-cancer-alcohol-and-society-2016-report-en.pdf (triggerfish.cloud)](https://wwwiogtse.cdn.triggerfish.cloud/uploads/2019/12/alcohol-and-cancer-alcohol-and-society-2016-report-en.pdf)

4. 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

5. IARC, 1988. IARC Monographs on the Evaluation of the Carcinogenic Risks to Humans Volume 44. Available from: <https://publications.iarc.fr/62>

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