

**Platform for Better Oral Health in Europe contribution to the TRIS notification
2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.**

The Platform for Better Oral Health in Europe (“the Platform”) is a joint initiative of the key European organisations involved in oral health, including the Association for Dental Education in Europe (ADEE), the Council of European Chief Dental Officers (CECDO), the European Association of Dental Public Health (EADPH), the Oral Health Foundation and the Pan-European Region of the International Association for Dental Research (PER-IADR) as well as 20 Associate Members. Through our advocacy efforts at a European level, we aim to achieve improvements in oral health across Europe.

The Platform wholeheartedly supports policy actions to address alcohol-related harm and therefore the full implementation of Ireland’s Public Health (Alcohol) Act 2018, which calls for, among a number of mandatory measures, on-product health warnings and information to improve health literacy regarding the inherent risk from alcohol use.

According to the World Health Organisation (WHO), excessive alcohol consumption is one of the major risk factors for non-communicable diseases, causing around 1/3 of oral cancers.¹ In 2016, alcohol consumption was the cause of over 900 000 deaths in the WHO European Region and about 3 million deaths worldwide.² Low-income groups represent higher proportions of alcohol-related deaths and hospitalization. At the same time, policies to curtail alcohol use lag behind those for comparable health determinants such as tobacco use, as stated in the WHO’s Health Evidence Network synthesis report on alcohol labelling.³

If we consider that in 2022, only a handful of countries were on track to meet the Sustainable Development Goal (SDG) target on reducing early deaths from NCDs by a third by 2030,⁴ we can only welcome new legislation such as the Alcohol Act that will help curtail alcohol-related deaths.

Consequently, we call on the Commission to support Member States in tackling the harmful effects of alcohol consumption by issuing a detailed opinion in support of Ireland’s Draft Regulations which outline rules for alcohol content, energy values and health warning labels on products, documents and notices in licensing premises, as well as rules for online sales.

¹ <https://pubmed.ncbi.nlm.nih.gov/34359747/>

² <https://apps.who.int/iris/bitstream/handle/10665/332129/9789289054898-eng.pdf?ua=1>

³ <https://apps.who.int/iris/bitstream/handle/10665/332129/9789289054898-eng.pdf?ua=1>

⁴ <https://www.who.int/teams/noncommunicable-diseases/invisible-numbers>