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

United European Gastroenterology (UEG) is a professional non-profit organization combining all the leading European medical specialists and national societies focusing on digestive health. Together, we act as the united and trusted voice of European Gastroenterology and take concerted efforts to raise awareness on the importance of digestive health among policy makers and the public.

We contribute to the creation of a favorable policy environment for digestive health by making sure scientific evidence is the basis for any decision affecting public health, particularly when digestive health is concerned.

It is commonly known that lifestyle factors have a significant impact on digestive diseases. Alcohol consumption, in particular, is a risk factor in over 60 types of diseases, with nearly 30% of deaths from gastrointestinal diseases directly attributed to alcohol.¹ In Europe, alcohol consumption is by far the leading cause of liver-related mortality, whereas chronic liver disease has a substantial impact on young individuals, with the peak age of death occurring as early as the 40s.²

Furthermore, the link between alcohol and cancer has been well documented since the early 20th century. Alcohol consumption is causally linked to cancers of the upper aerodigestive tract (oral cavity, pharynx, larynx, and oesophagus) and cancers of the colon, rectum, liver, and female breast. In addition, there is accumulating evidence that drinking alcohol is associated with pancreatic cancer³ and increased risk of gastric cancers⁴. Extensive research has identified multiple ways that alcohol may increase the risk of digestive cancers both by damaging cells, as well as a result of the metabolising of ethanol, the intoxicating ingredient in alcoholic beverages. Most ethanol will be metabolised to acetaldehyde in the liver but salivary acetaldehyde has also been found to reach high levels while drinking.⁵

With 135,000 alcohol-related cancer deaths predicted by 2035⁶ and even moderate drinking having a significant impact on increasing the risk of digestive cancers, it is more vital than ever for government action and intervention to reduce the harmful use of alcohol.

¹ World Health Organisation. 2014. Global status report on alcohol and health 2014. Available at: <https://www.who.int/publications/i/item/global-status-report-on-alcohol-and-health-2014>

² The EASL-Lancet Commission. 2021. Protecting the next generation of Europeans against liver disease complications and premature mortality. Available at: <https://www.thelancet.com/commissions/liver-disease-europe>

³ Cancer Causes and Control. 2010. Risk of pancreatic cancer by alcohol dose, duration, and pattern of consumption, including binge drinking: a populationbased study. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2883092/>

⁴ British Journal of Cancer. 2015. Alcohol consumption and site-specific cancer risk: a comprehensive dose–response meta-analysis. Available at: <https://www.nature.com/articles/bjc2014579>

⁵ United European Gastroenterology. 2017. Alcohol and Digestive Cancers. Available at: <https://ueg.eu/files/352/371bce7dc83817b7893bcdeed13799b5.pdf>

⁶ Cancer Research UK. 2016. 135,000 alcohol-related cancer deaths predicted by 2035. Available at: <https://news.cancerresearchuk.org/2016/11/18/135000-alcohol-related-cancer-deaths-predicted-by-2035/>

Raising awareness of the risk of alcohol via labelling of alcoholic beverages is a key policy approach to curb the consumption of alcohol. Informative labelling should be provided for members of the public to ensure that they are able to make truly informed, as well as healthy, decisions.

Therefore, UEG 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.

We applaud the initiative of national governments to implement stricter labelling requirements and hope more European countries will follow suit.

Finally, as members of the European Alcohol Policy Alliance (Eurocare), we hereby also extend our support for Eurocare's submission.