

## Introduction

Established in 1963, the Irish Cancer Society is Ireland's national cancer charity. Our vision is that every person in Ireland will have access to the best possible cancer services; will have the lowest risk of getting cancer, the highest chance of survival and the best support and information available when affected by cancer. Our goals are cancer prevention, early detection and fighting cancer with three programme areas to achieve them: advocacy, cancer services and research.

The Irish Cancer Society strongly supports the Public Health (Alcohol) Bill 2015, which legislates for alcohol as a public health issue for the first time. We advocated for the Bill to go further in its labelling provisions and called for a specific warning on alcohol products and in alcohol advertisements that highlight the link between alcohol and fatal cancers, which passed Committee, Report and Final stages of the Irish Seanad (upper house of Parliament), and the first three legislative stages in the Dáil (lower house).

We believe health warning labels are a necessary public health measure to create awareness about the dangers of alcohol to health, and believe the introduction of cancer warnings on labels will draw much-needed awareness to the well-established link between alcohol and cancer.

## The link between alcohol and cancer

The International Agency for Research on Cancer (IARC) classifies alcohol as a group 1 carcinogen, as there is a causal link between alcohol and cancer of the mouth, pharynx, larynx, oesophagus, liver, large bowel and female breast.<sup>1</sup> There is no safe limit of alcohol consumption which eliminates the risk of getting cancer and there is a long lag time between alcohol consumption and cancer.<sup>2</sup>

The Irish Cancer Society believes health labelling and advertising which establishes the link between alcohol and fatal cancers is a reasonable and proportionate measure which ensures that the public can make informed choices about alcohol consumption.

In Ireland, 500 people each year die from alcohol related cancers, and 900 people are diagnosed with alcohol-related cancers.<sup>3</sup> Alcohol-related cancers are among the most preventable causes of cancer.

Additionally, people in Ireland who are diagnosed with cancers caused by alcohol are 50% more likely to die than those with other cancers; these cancers are generally more aggressive, and cost more to treat.

A recent statement by the American Society of Clinical Oncology demonstrated that:

- The risk of oesophageal cancer for heavy drinkers is almost 5 times that of non-drinkers and the risk for moderate drinkers is over twice that of non-drinkers.

- The risk of mouth (oral cavity) and throat (pharyngeal) cancer in heavy-drinkers is 5 times that of non-drinkers<sup>4</sup>.

Despite global alcohol industry arguments that the science regarding alcohol consumption and cancer is far from settled, the IARC monograph classifying alcohol as a Group 1 carcinogen, published 30 years ago, established alcohol as a cause of cancers of the oral cavity, pharynx, larynx, oesophagus, and liver<sup>5</sup> – in 2010 this was updated to include breast and colorectal cancer.<sup>6</sup>

### Labelling

Provisions to warn of the link between alcohol and fatal cancers on labelling and in advertising will help establish a social understanding that alcohol is a dangerous commodity, which is currently far from being realised. Only 1 in 4 women in Ireland are aware of the increased risk of breast cancer from heavy drinking, while only 4 in 10 people are aware of the link with bowel cancer<sup>7</sup>.

It is imperative that action is taken to increase the Irish public's knowledge of the link between alcohol and fatal cancers in an effort to lower people's risk of getting cancer in the future.

According to the World Health Organisation (WHO), labelling provides a unique opportunity for governments to disseminate health messages at the point of sale and point of consumption. Placing health information on alcoholic drinks and containers targets the appropriate audience (the drinker) at the appropriate time (when purchasing and using the product). Health information labels act as an inexpensive tool that provides direct information on the risks associated with alcohol consumption.<sup>8</sup>

Even though alcohol is one of the biggest causes of cancer after tobacco smoking, the public is not generally aware of the risk of cancer from alcohol, a situation that is jeopardising public health.

The introduction of warning labels on alcoholic beverages is swiftly increasing and are now mandatory in several countries, including Brazil, Colombia, Costa Rica, France, Guatemala, Mexico, Russia, South Africa, South Korea, Taiwan, Thailand, and the US.

Recent research carried out in the UK by Cancer Research UK and The University of Sheffield found that only around 1 in 10 is aware of the link between alcohol and cancer.<sup>9</sup>

The research showed that 67% of people either supported or strongly supported health warnings on alcohol containers advising that alcohol can harm your health, with only 9% opposed to the measure, while 64% either supported or strongly supported messaging advising that alcohol increases the risk of cancer, with only 10% opposed.

There is also strong support for more labelling on cans and bottles containing alcohol in Ireland. The vast majority of those surveyed (98%) support including labelling on the alcohol strength, the number of calories (82%), and details of alcohol-related harms (95%) and on the ingredients (91%).<sup>10</sup>

### Conclusion

The Irish Cancer Society strongly encourages the European Commission to facilitate the additional notified specifications, particularly with regard to labelling and advertising.

The legislation has the power to change Ireland's relationship with alcohol consumption, while protecting the public's health. This legislation also will ensure the Irish public is informed about the strong link between alcohol and fatal cancers, a link which needs greater awareness to prevent alcohol related cancers in Ireland.

Despite dire warnings to the contrary, the specifications relating to labelling will not restrict free movement on goods, especially given that - as per Section 12 (1) of the Bill – offences related to the labelling of alcohol products and notices in licensed premises relate to the sale of alcohol *in* the State.

We welcome the submissions from European and Irish colleagues in support of these specifications, the Irish Department of Health and Minister for Health's strong support for these important and ground-breaking public health measures and note the disproportionate and unnecessary response from North American and Oceanic lobby groups. These interventions misunderstand the legislation, misinterpret long-standing scientific evidence and clearly seek to undermine Member State competency in protecting the health of its citizens.

Traditionally, Ireland has had a dangerous relationship with alcohol. In 2014, alcohol consumption trends per capita increased to 11.0 litres, which corresponds to 41 (700 ml) bottles of vodka, 116 (750 ml) bottles of wine or 445 pints of beer (alcohol by volume (ABV) 4.3%) per adult in Ireland. As 20.6% of the adult population abstain from alcohol completely, those who drink alcohol consume even greater quantities (46 bottles of vodka or 130 bottles of wine or 498 pints of beer).<sup>11</sup>

Alcohol is responsible for a considerable burden of health harm in Ireland which in turn costs our health system at least €1.5 billion annually.<sup>12</sup>

The specifications notified to the European Commission will provide the Irish public with important facts that helps them in making informed choices relating to consumption, and alongside the range of measures outlined elsewhere in the Bill can significantly reduce alcohol harm.

**For more information on alcohol labelling, please contact:**

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<sup>1</sup> IARC Working Group on the Evaluation of Carcinogenic Risks to Humans. Alcohol consumption and ethyl carbamate <https://monographs.iarc.fr/wp-content/uploads/2018/06/mono96.pdf>

<sup>2</sup> IARC Working Group on the Evaluation of Carcinogenic Risks to Humans. Personal habits and indoor combustions. Volume 100 E. A review of human carcinogens. <https://monographs.iarc.fr/wp-content/uploads/2018/06/mono100E.pdf>

<sup>3</sup> Laffoy, M., et al. (2013) 'Cancer incidence and mortality due to alcohol: an analysis of 10 year data'. <https://www.esri.ie/pubs/JACB201381.pdf>

<sup>4</sup> LoConte, N., et al. (2018), 'Alcohol and Cancer: A Statement of the American Society of Clinical Oncology'. <http://ascopubs.org/doi/abs/10.1200/JCO.2017.76.1155>

<sup>5</sup> IARC Monographs on the Evaluation of Carcinogenic Risks to Humans. Volume 44. (1988) <https://monographs.iarc.fr/iarc-monographs-on-the-evaluation-of-carcinogenic-risks-to-humans-77/>

<sup>6</sup> IARC Monographs on the Evaluation of Carcinogenic Risks to Humans. Volume 96. (2010) <https://monographs.iarc.fr/iarc-monographs-on-the-evaluation-of-carcinogenic-risks-to-humans-25/>

<sup>7</sup> Healthy Ireland Survey 2016 <https://health.gov.ie/wp-content/uploads/2016/10/Healthy-Ireland-Survey-2016-Summary-Findings.pdf>

<sup>8</sup> World Health Organisation (WHO) Alcohol labelling: A discussion document on policy options [http://www.euro.who.int/\\_data/assets/pdf\\_file/0006/343806/WH07\\_Alcohol\\_Labelling\\_full\\_v3.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0006/343806/WH07_Alcohol_Labelling_full_v3.pdf?ua=1)

<sup>9</sup> Buykx, P., et al. (2015) 'An Investigation of Public Knowledge of the Link between Alcohol and Cancer.' [http://www.cancerresearchuk.org/sites/default/files/an\\_investigation\\_of\\_public\\_knowledge\\_of\\_the\\_link\\_between\\_alcohol\\_and\\_cancer\\_buykx\\_et\\_al.pdf](http://www.cancerresearchuk.org/sites/default/files/an_investigation_of_public_knowledge_of_the_link_between_alcohol_and_cancer_buykx_et_al.pdf)

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<sup>10</sup> Health Research Board (2012), 'Alcohol: Public knowledge, attitudes and behaviours.'  
[http://www.drugs.ie/resourcesfiles/reports/Alcohol\\_Public\\_Knowledge\\_Attitudes\\_and\\_Behaviours\\_Report.pdf](http://www.drugs.ie/resourcesfiles/reports/Alcohol_Public_Knowledge_Attitudes_and_Behaviours_Report.pdf)

<sup>11</sup> Mongan D and Long J (2016) Overview of alcohol consumption, alcohol-related harm and alcohol policy in Ireland. HRB Overview Series 10. Dublin: Health Research Board.  
[http://www.hrb.ie/fileadmin/publications\\_files/Alcohol\\_in\\_Ireland\\_consumption\\_harm\\_cost\\_and\\_policy\\_response.pdf](http://www.hrb.ie/fileadmin/publications_files/Alcohol_in_Ireland_consumption_harm_cost_and_policy_response.pdf)

<sup>12</sup> Mongan D and Long J (2016) Overview of alcohol consumption, alcohol-related harm and alcohol policy in Ireland. HRB Overview Series 10. Dublin: Health Research Board.  
[http://www.hrb.ie/fileadmin/publications\\_files/Alcohol\\_in\\_Ireland\\_consumption\\_harm\\_cost\\_and\\_policy\\_response.pdf](http://www.hrb.ie/fileadmin/publications_files/Alcohol_in_Ireland_consumption_harm_cost_and_policy_response.pdf)