

Global Alcohol Policy Alliance

submission to the

Notification of Draft Regulations Under Section 12 of the Public Health (Alcohol) Act 2018

TRIS Notification Number: 2022/441/IRL

The Global Alcohol Policy Alliance (GAPA) is a network of non-governmental organisations and people working in public health who advocate for effective alcohol policies, free from commercial interests. GAPA has regional alliances in Europe; Asia/Pacific; Africa; Caribbean; Latin America and the United States.

GAPA wants to make the following submission to the TRIS Notification number 2022/441/IRL (22 September 2022) focusing on the question of warning labels on alcohol containers mandated by the Public Health (Alcohol) Act 2018. In addition, GAPA supports the submission by Eurocare, the European Alcohol Policy Alliance.

The Draft Regulations propose labelling alcohol containers with three warnings: “Drinking alcohol causes liver disease”, a silhouette of a pregnant woman enclosed in a red strikethrough circle, and “There is a direct link between alcohol and fatal cancers”. Rules are set out on labelling the quantity in grams of alcohol contained in the container, the energy value in kilojoules and kilocalories contained in the container, and the public health information website.

GAPA supports Ireland’s proposed labelling regulation on the grounds of the principles of the right of consumers to know the content and risks involved in the product they are consuming. The transnational alcohol corporations downplay the health risks of their products, including for cancer, and promote alcohol as a healthy product. Labelling is one step governments can take to counter this misinformation.

The low public awareness of some of the harmful effects of alcohol and the perception that alcohol is an ordinary commodity may also be addressed by labelling. Public health oriented measures need to be implemented to reduce the harm from alcohol consumption and we are supportive of these moves to introduce labelling because of the association which has been shown between increased awareness of alcohol as a cause of cancer and increased support for alcohol policies (Bates et al.; Weerasinghe et al). Implementation of alcohol policies which shape the environment are more likely to reduce harm than interventions aimed at persuading the individual to change their behaviour. Implementation of labelling

should be carefully evaluated to assess any unforeseen effects among some sectors of the population (Haines-Saah, Bell, Dennis).

Alcohol harm is a major, and often overlooked, public health problem. There are an estimated 3 million alcohol deaths globally every year, and the additional burden of harm to people other than the drinker, socio-economic effects for the family, community and society at large are also substantial, but much more difficult to measure. Europe is the heaviest drinking region in the world and Ireland struggles with alcohol related health and socio-economic challenges that is the backdrop of the Public Health Act (Alcohol) 2018.

The 75th World Health Assembly in May 2022 endorsed the Global Alcohol Action Plan, *Action plan (2022–2030) to effectively implement the global strategy to reduce the harmful use of alcohol as a public health priority* (WHO 2022). This action plan was adopted unanimously with support from EU countries. It includes an action point for Member States:

“Ensure appropriate consumer protection measures through the development and implementation of labelling requirements for alcoholic beverages that display essential information for health protection on alcohol content in a way that is understood by consumers and also provides information on other ingredients with potential impact on the health of consumers, caloric value and health warnings.”
(Action Area 2, Action 8 for Member States).

At the WHO Regional Committee meeting in Tel Aviv in September 2022 the Member States of the WHO European Region adopted *the European framework for action on alcohol 2022–2025* (WHO EURO 2022) which has a separate chapter devoted to “Health information, with a specific focus on alcohol labelling”. Among the priorities for action is:

b) statutory labelling requirements informed by WHO guidance, with labels that include nutrition and ingredients as well as health warnings;

Furthermore, *Europe's Beating Cancer Plan* of 2021 outlines a “political commitment to leave no stone unturned to take action against cancer”. Under the proposed prevention actions on “Saving lives through sustainable cancer prevention”, it outlines the need to “give people the information and tools they need to make healthier choices” (European Commission, 2021).

GAPA’s conclusion is that the implementation of the draft legislation under Section 12 of the Public Health (Alcohol) Act 2018 is in line with the aim of providing knowledge of health effects of alcohol. At the population level this may address the normalisation of alcohol products which is supported by alcohol marketing and may increase support for effective alcohol policies. In view of the extent of alcohol harm this is supported, and we urge the Commission to support Member States in their fight against the devastating effects of alcohol. Henceforth GAPA urges the Commission to issue a detailed opinion on the Draft Regulations to support its adoption.

References:

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