



VLAAMS EXPERTISECENTRUM
ALCOHOL EN ANDERE DRUGS

VAD's contribution to the TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.

VAD (Vereniging voor Alcohol- en andere Drugproblemen, www.vad.be) is the Flemish center of expertise on alcohol and other drugs and is the partner organization of the Flemish Government within the framework of its prevention policy on alcohol and other drug problems. VAD focuses on the issues of alcohol, illegal drugs, psychoactive medication, gaming and gambling from a welfare and health perspective. In that context, VAD collects and processes information, develops prevention interventions that we implement and evaluate, and organizes training. The target population of VAD is the general Flemish population on the one hand and professionals who have professional contact with alcohol and drug use (= intermediaries) on the other hand. VAD wants to educate the general public from a health and welfare perspective and improve the expertise of intermediaries about the handling of alcohol, illegal drugs, psychoactive medication, gaming and gambling. At the same time, VAD is an umbrella organization with around 80 members providing alcohol and drug services (prevention, early intervention, treatment, harm reduction, research) in Flanders (Belgium).

VAD strongly supports the Irish government's legislation on labelling of alcohol products, and the modalities of the Draft Regulations, with consumer and product information and health warnings both on-product and in alcohol licensed premises. These measures are part of a broader strategy to reduce alcohol-related harms.

Our rationale


Consumers of products available on the market, should be well advised on the risks associated with the product concerned and on the ingredients and the content of the product concerned. Consumers have the 'right to know' accurate health information so they can make informed decisions about the risk of alcohol use and the impact to their health and wellbeing.

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. Alcohol health warning labels are part of a broad package of measures that have an effect in the area of public health,.

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.

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.





The Norwegian government's Health Directorate has examined the policy solution of alcohol warning labels since July 2021. In their letter of recommendation, the Norwegian Directorate of Health emphasizes that warning labeling can be an important tool for increasing the population's knowledge about possible health damage from alcohol use. The Norwegian Directorate of Health is recommending labeling alcoholic products with a health warning, especially concerning cancer and cardiovascular disease. The recommendation comes after extensive investigations and alcohol labeling is set to be an important element of the government's new alcohol strategy.

Movendi International contributed to the directorate's investigation into the evidence base with a [dedicated briefing on the latest evidence and best practices worldwide](https://movendi.ngo/wp-content/uploads/2022/04/Science-policy_alcohol-labeling.pdf), concerning alcohol warning labeling.

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For an overview of current evidence concerning alcohol health warning labels, a systematic review was published in 2020 with meta-analysis using Cochrane methods. The review found significant potential for health warning labels to reduce unhealthy selection of food and alcoholic drinks. Most experimental studies to date were conducted in laboratory or online settings with outcomes assessed immediately after a single exposure.

<https://www.tandfonline.com/doi/full/10.1080/17437199.2020.1780147>

A scoping review published in August 2021 examined novel or enhanced alcohol health warning labels. Evidence from one real-world long-term labelling intervention demonstrated that alcohol health warning labels designed to be visible and contain novel and specific information have the potential to be part of an effective labelling strategy.

<https://www.mdpi.com/2072-6643/13/9/3065>

Given the shortage of real-life alcohol labeling cases and analysis of those, a new study protocol has now been developed through the work in Yukon, Canada: <https://www.researchprotocols.org/2020/1/e16320/>. The example of Yukon is highly important, as it elucidates several critical aspects of the alcohol labeling policy debate. A series of journal articles published on the Journal of Studies on Alcohol and Drugs (Volume 81, Issue 2) in March 2020 support that when alcohol bottles come with conspicuous labels providing information on the risks of alcohol consumption or alcohol use guidelines, people are better informed about alcohol's harms and may cut down their alcohol use.

Conclusions and key messages from the Yukon, Canada studies:

- Enhanced alcohol labels get noticed and may be an effective population-level strategy for increasing awareness and knowledge of national alcohol use guidelines. <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.262>
- Applying new AWLs was associated with reduced population alcohol consumption. The results are consistent with an accumulating impact of the addition of varying and highly visible labels with impactful messages. <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.225>
- Enhanced alcohol labels can improve label salience and processing among alcohol users. Alcohol users exposed to labels were more likely to report consuming less due to labels. Strengthening alcohol labels should be a priority for alcohol control. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7224201/>
- In a real-world setting, cancer warning labels get noticed and increase knowledge that alcohol can cause cancer. Additional cancer label intervention studies are required that are not compromised by industry interference. <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.249>



For now, alcohol labels are an underused way of empowering consumers to make healthy decisions about alcohol consumption in Europe, given the potential benefits and relatively low cost of such measures. Public health organizations and consumers are strong advocates for better labeling of alcoholic beverages. As mentioned before, policy considerations for the development of successful labelling legislation should address both health information and nutritional information, ensure regulated message presentation, and implement independent monitoring and evaluation of measures.

Conclusion

Because of the many undisputed risks for health and public safety there should be no exception for alcohol in the obligation to have appropriate information and health warning messages on their containers.

We strongly support Irish government in this progressive public health initiative that combats the devastating effects of alcohol. We also support the Eurocare submission.

