

**Comments to Public Health (Alcohol) Bill 2015 (in so far as it relates to the 3 additional specifications to labelling, advertising and broadcast watershed).**



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## The European Alcohol Policy Alliance (EUROCARE)

The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governmental and public health organisations with around 55 member organisations across 23 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in advocacy and research, as well as in the provision of information and training on alcohol issues and the service for people whose lives are affected by alcohol problems.

The mission of Eurocare is to promote policies to prevent and reduce alcohol related harm. The message, in regard to alcohol consumption is “**less is better**”.

### Eurocare’s contribution to TRIS system on: Public Health (Alcohol) Bill 2015 (in so far as it relates to the 3 additional specifications to labelling, advertising and broadcast watershed).

European Alcohol Policy Alliance (Eurocare) welcomes the propositions of the Irish Government with relation to tackling alcohol related harm.

As a general comment Eurocare would like to highlight that measures in the Public Health (Alcohol) Bill are in line with the latest evidence base in the field of alcohol policy.

World Health Organization *Global strategy to reduce harmful use of alcohol* as well as the World Health Organization *European action plan to reduce the harmful use of alcohol 2012–2020* encompass measures proposed by the Irish Bill.

Moreover, the Sustainable Development Goal 3, Goal 3. Target 3.5, with which the European Union has an obligation to comply, calls for strengthening of the prevention efforts in the area of alcohol related harm.

The Irish provisions also closely follow the 2006 *European Union strategy to support Member States in reducing alcohol related harm*.

### Alcohol and Cancer

Volume 96 of the IARC Monographs found there to be ‘sufficient evidence for the carcinogenicity of alcoholic beverages in humans. The occurrence of malignant tumours of the oral cavity, pharynx, larynx, oesophagus and liver is causally related to the consumption of alcoholic beverages.’ Since 1987, connections between alcohol intake and cancer of the breast, colorectum and liver have also been identified. Indeed, the 2010 monograph identified a relative increased risk for breast cancer for which ‘regular consumption of even 18g of alcohol per day the relative risk is significantly increased. ’18g per day is equivalent to just under 2 regular glasses of wine, 1.3 pints of beer or nearly 6cl of whiskey. Likewise, the monographs confirm an increased relative risk in colorectal cancer for regular drinkers of 50g of alcohol per day.

## Need for increased awareness

Experts have known since 1987 that alcohol can cause cancer, but the connection between the two is often unknown, or ignored. Research in Europe has shown that 1 in 10 Europeans do not know about the connection, and that 1 in 5 do not believe that there is a connection between cancer and the drinks<sup>1</sup>.

Low levels of public awareness can be found across Europe, latest survey in France has shown that only 23% of respondents identify it as the second risk factor for cancer after smoking<sup>2</sup>.

The European Union has recognised the need to promote information regarding preventative measures targeted at individuals and public at large. Since 1987 it leads the initiative of European Code Against Cancer, the current fourth edition has a revised message in terms of alcohol consumption:

***If you drink alcohol of any type, limit your intake.***

***Not drinking alcohol is better for cancer prevention.***

As stated on the European Code Against Cancer website<sup>3</sup>:

*There is no doubt that drinking alcohol can cause at least seven types of cancer: those of the mouth, gullet (oesophagus), throat (pharynx and larynx), liver, large bowel (colon and rectum), and breast.*

*Consumption of any amount of alcohol increases your cancer risk. The more alcohol you drink, the higher the risk of developing cancer. Reducing your consumption or – even better – avoiding alcohol completely will help reduce your cancer risk.*

It only appears appropriate that an EU Member State should be allowed to inform their citizens of the potential health risks associated with alcohol consumption.

## Labelling as a tool to inform and educate

Product labels can serve a number of purposes: providing information about the product to the consumer, enticing the consumer to buy the product and alerting consumers to the dangers and health risks from the product.

It has been noted that the US health labels have prompted discussions<sup>4</sup> about the dangers of drinking, steadily increased awareness of the labels, and there is evidence of increased public support for alcohol labeling by the US public following its introduction.<sup>5</sup>

Similarly, pregnant women who saw the labels were more likely to discuss the issue; in addition a 'dose-response' effect was found such that the more types of warnings the

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<sup>1</sup> EU citizen's attitudes towards alcohol, Eurobarometer EUROBAROMETER 72.3. Special Eurobarometer 331

<sup>2</sup> Résultats d'un sondage réalisé par Opinion Way pour la Ligue contre le cancer

<sup>3</sup> <https://cancer-code-europe.iarc.fr/index.php/en/>

<sup>4</sup> Kaskutas and Greenfield 1992. In Stockwell T. (2006) *A Review of Research Into The Impacts of Alcohol warning Labels On Attitudes And Behaviour*. University of Victoria, Canada.

<sup>5</sup> Greenfield (1997) in Stockwell T. (2006) *A Review of Research Into The Impacts of Alcohol warning Labels On Attitudes And Behaviour*. University of Victoria, Canada.

respondents had seen (on adverts at point of-sale, in magazines and on containers) the more likely they were to have discussed the issue.<sup>6</sup>

In France comparable results were found in relation to introduction of the pictogram in 2006. A study of public awareness regarding the dangers of drinking alcohol during pregnancy indicated a positive evolution in terms of changing the social norm towards 'no alcohol during pregnancy'.<sup>7</sup>

It could plausibly be argued that where label regulations have been used, there has indeed been a shift towards regarding alcohol as more problematic and heavier drinking has become less 'normalised'.<sup>8</sup>

Furthermore, warning label messages might serve to legitimate a socially challenging intervention, such as increasing activities that aim to reduce the likelihood of an inebriated person getting behind the wheel.<sup>9</sup>

The tobacco labelling experience offers strong evidence that warning labels can be effective, not only in increasing information and changing attitudes, but also in affecting behaviour. Results from the International Tobacco Control evaluation also support the effects of pictorial labelling. At least one-quarter of respondents from all four countries reported that the package warnings had made them more likely to quit.<sup>10</sup>

Cigarette packages warnings have had most critical influence in a more indirect manner, such as by influencing non-smokers to encourage smokers to stop through peer pressure – an important influence of the warnings that might be very difficult to assess.<sup>11</sup>

## Marketing and watershed

Exposure to alcohol advertising increases the likelihood that young people start drinking at an earlier age, and to drink more if they already consume alcohol<sup>12</sup>.

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<sup>6</sup> Kaskutas and Greenfield 1992. In Stockwell T. (2006) *A Review of Research Into The Impacts of Alcohol warning Labels On Attitudes And Behaviour*. University of Victoria, Canada.

<sup>7</sup> Guillemont J. (2009) Labelling on alcoholic drinks packaging: The French experience. Presentation to the CNAPA meeting, February 2009 retrieved from:

[http://ec.europa.eu/health/archive/ph\\_determinants/life\\_style/alcohol/documents/ev\\_20090217\\_co08\\_en.pdf](http://ec.europa.eu/health/archive/ph_determinants/life_style/alcohol/documents/ev_20090217_co08_en.pdf)

<sup>8</sup> Wilkinson C. and Room R. (2009) Warnings on alcohol containers and advertisements: International experience and evidence on effects. *Drug and Alcohol Review*, 28, 426-435

<sup>9</sup> Tam, W. T. Et al (2010) Do Alcohol Warning Labels Influence Men's and Women's Attempts to Deter Others from Driving When Intoxicated?. *Human factors and Ergonomics in Manufacturing Service Industries*, 20 (6), 538-546

<sup>10</sup> Ferrence R, Hammond D, Fong GT. Warning labels and packaging In: Bonnie RJ, Stratton K, Wallace RB, eds ending tobacco problem: blueprint for the national. Committee on Reducing Tobacco Use: strategies, barriers, and consequences. Washington: National Academy Press, 2007: 435-48

<sup>11</sup> Wogalter, S.M. and Brelsford, W. J. (1994) Incidental exposure to rotating warnings on alcoholic beverages. *Proceedings of Human Factors and Ergonomics Society 38th Annual meeting*

<sup>12</sup> AMPHORA project; Andreson et al. (2009) Impact of alcohol advertising and media exposure on adolescents' alcohol use: a systematic review of longitudinal studies. *Alcohol* 44(3), 229-243

Smith and Foxcroft (2009) The effect of alcohol advertising, marketing and portrayal on drinking behaviour in young peoples: systematic review of perspective cohort studies. *BMC Public Health*, 9, 51.

Despite being a key health determinant alcohol is still heavily marketed with young people as an important target group. In 2009, the Science Group of the European Alcohol and Health Forum reviewed evidence<sup>13</sup> looking at the impact of marketing on the volume and patterns of drinking alcohol. It concluded that alcohol marketing increases the likelihood that young people will start to drink alcohol and that if they are already drinking, they will drink more in terms of amount and frequency. According to the WHO European Charter on Alcohol 1995, “All children and adolescents have the right to grow up in an environment protected from the negative consequences of alcohol consumption and, to the extent possible, from the promotion of alcoholic beverages”. Reducing exposure to alcohol marketing by young people should be a key objective

Watershed is a well-known measure utilised by other European countries such as: Austria, Bulgaria, Cyprus, Denmark, Finland, Germany, Hungary, Italy, Latvia, Lithuania, Malta, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain.<sup>14</sup>

## Final remarks

To conclude, one of the objectives of public bodies should be to effectively protect people from risks and threats that they cannot tackle as individuals. Irish authorities have taken appropriate steps to alert the public to inform them about the dangers of drinking alcohol in relation to cancer prevention.

Health is a public interest worthy of consideration in development and implementation of all policies. Right to health should be considered alongside the right of the commercial operators to trade, to property and to expression. It is our hope that the European Union institutions and its Member States will allow Ireland to put the health of their citizens ahead of profits of the alcohol industry.

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<sup>13</sup> Science Group of the Alcohol and Health Forum (2009) Does marketing communication impact on the volume and patterns of consumption of alcoholic beverages, especially by young people? As retrieved from: [https://ec.europa.eu/health/ph\\_determinants/life\\_style/alcohol/Forum/docs/science\\_o01\\_en.pdf](https://ec.europa.eu/health/ph_determinants/life_style/alcohol/Forum/docs/science_o01_en.pdf)

<sup>14</sup> Advertising restrictions on national television WHO Global Health Observatory Data Repository (European Region) 2012