



IRISH MEDICAL
ORGANISATION
Ceardchumann Dochtúirí na hÉireann

**IMO Submission to the Food Safety Authority of Ireland (FSAI)
Consultation on Regulations under Sections 12 and 13
of the Public Health (Alcohol) Act 2018**

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IMO Submission to the Food Safety Authority of Ireland (FSAI) Consultation in Respect of Regulations Under Sections 12 and 13 of the Public Health (Alcohol) Act 2018.

The Irish Medical Organisation is the trade union and representative body for all Doctors in Ireland and for many years the IMO has been advocating for a range of measures to reduce high levels of alcohol consumption and binge-drinking in Ireland and its consequent harm to individuals.

- Consuming approximately 11.0 litres per capita,ⁱ Irish adults are among the highest consumers of alcohol in Europe.
- Up to 81% of Irish women report drinking during the peri-conceptual period or during pregnancy.ⁱⁱ
- Alcohol is classified as a group 1 carcinogen by the WHO's International Agency for Research on Cancer (IARC) as there is a proven, causal link between alcohol and several types of cancer including cancer of the mouth, pharynx, larynx, oesophagus, liver, bowel and female breast.ⁱⁱⁱ In Ireland every year approximately 900 new cancers and 500 cancer deaths are attributable to alcohol.^{iv}
- 1 in 67 women who consume alcohol in pregnancy give birth to a baby with Fetal Alcohol Syndrome^v - that is an estimated 600 babies born with FAS each year in Ireland.
- Alcohol consumption is associated with more than 60 other acute and chronic health disorders ranging from accidents and assaults to mental health problems, cardiovascular disease, and liver cirrhosis.^{vi}

The IMO fully supports the measures contained in the Irish Public Health (Alcohol) Act 2018 and welcomes the opportunity to submit evidence in relation the effectiveness of including relevant health warnings and information on the labels of alcohol products, on notices in licensed premises, in documents required for alcohol sold in reusable containers and on websites that sell alcohol products, as well as in advertisements for alcohol products.

Health Warnings

Labelling has been shown to be an effective means of raising awareness of the health-related consequences of alcohol consumption as demonstrated by the efficacy health warnings on tobacco products internationally. A significant body of international evidence shows that the size and graphic nature of cigarette health warnings has been effective in educating the public about the negative effects of cigarettes and encouraging smokers to quit^{vii viii ix}. Health warnings similar to those on cigarette packs have the potential to change consumer perceptions of alcohol products.^{x xi}
^{xii} Cancer warnings and warnings related to alcohol consumption during pregnancy, when delivered across a range of fora have the potential to inform consumers of the long-term health impacts and encourage behavioural change.^{xiii xiv} The multiplicity of warnings applied to various public education contexts are likely to have most impact^{xv} and should be repeated across product labels, notices in licenced premises, websites selling alcohol and included in any advertisements for alcohol products.

Warnings relating to the danger of consuming alcohol when pregnant should be extended to warn of the danger of consuming alcohol when planning pregnancy, as research has shown that even moderate alcohol intake during the first few weeks of pregnancy, at a time when the expectant mother may yet be unaware of her pregnancy, can impact the health of the infant.^{xvi}

Research of health warnings displayed on tobacco products show that whereas small or obscure text-only warnings seem to have minimal impact, prominent health warnings on the face of containers serve as an effective source of health information.^{xvii} When viewing containers or packages, the attention of consumers is drawn to the most dominant visual element, and generally progresses sequentially to other elements in order of their visual dominance.^{xviii} Useful elements in achieving a level of visual dominance required of an effective health warning include: font; location on container; size; colour; use of imagery; clarity and memorability of message; and simplicity of language used.^{xix} Examining the research on alcohol labelling, the World Health Organisation (WHO)^{xx} found that four message components should be considered when developing effective health labels: (i) signal word to attract attention; (ii) identification of the problem; (iii) explanation of the consequences if exposed to the problem; and (iv) instructions for avoiding the problem. Also visual impact can be enhanced by using large, bold print; high contrast; colour; borders; and pictorial symbols.

When developing regulations in relation to Sections 12 and 13 of the Public Health (Alcohol) Act 2018, the IMO recommends that the FSAI examine the large body of literature published that presents the efficacy of health warnings in modifying consumer behaviour towards alcohol. Labels should be combined with a public health information campaign to raise awareness of the health risks associated with alcohol consumption.

Quantity of Grams of Alcohol

Given the health risks associated with alcohol misuse, consumers have the right to information regarding the alcohol content present within a container, however, research shows that many consumers lack a clear understanding of the recommended daily intake of alcohol. This is because idea of drinking “too much” or “drinking sensibly” as often promoted by the alcohol industry are vague concepts to many. Despite the fact that 54% of Irish adults are rated as harmful drinkers according to the World Health Organisation’s AUDIT-C screening tool, just 2.1% of Irish adults consider themselves to be heavy drinkers, with 39.6% and 58.3% describing themselves moderate and light drinkers respectively.^{xxi} Therefore, health labels should state what proportion of the maximum recommended daily or weekly alcohol unit limit the alcohol product contains. These limits are set at approximately two to three units of alcohol per day for a man, and one to two units of alcohol per day for a woman by the health departments of many EU states such as Austria, France, and Germany, and seventeen units a week for a man and eleven units a week for a woman by the Department of Health in Ireland.^{xxii}

Research from Canada, suggests that labels using Standard Drinks (SD) and low risk drinking guidelines (LRDG) compared to labels showing the percentage of alcohol per volume would help consumers better understand drinking guidelines and better estimate their consumption.^{xxiii} In France, where health warnings about the consequences of alcohol during pregnancy have been in place since 2007, research suggests there is also a need for additional communication strategies beyond the warning label to improve the understanding of a standard drink.^{xxiv}

Information regarding the quantity of grams/millilitres of alcohol present in the container should be combined with notification on the label of proportion of the maximum daily or weekly recommended intake of alcohol the contents of the container amount to. Standard drink and low risk-drinking guidelines should be included on the label along and again combined with communications strategies to improve understanding of a standard drink.

Energy and Nutritional Content Labelling

Given the high calorie and sugar content of alcoholic beverages, the labelling of alcohol products with comprehensible information on energy and nutritional content is essential to allow consumers to make informed and healthier choices.^{xxv} EU Regulation 1169/2011 on the provision of food information to consumers demands that all foodstuffs display ingredients and nutritional values on their packaging^{xxvi} and there is no reason why alcohol products should be treated any differently.

Labelling of the energy and nutritional values per 100ml should be composed of

- **energy value (kJ/kcal),**
- **fat (g),**
- **saturated fat (g),**
- **carbohydrates (g),**
- **sugars (g),**
- **proteins (g)**
- **salt (g).**^{xxvii}

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