

Hon. Carolyn Bennett
Minister of Mental Health and Addictions
House of Commons
Ottawa, Ontario, Canada K1A 0A6
mhaminister.ministresmd@hsc.gc.ca

Dear Ministers Duclos and Bennett,

Re: Public interest in labels with health warning, guidelines on alcohol and health, number of standard drinks, and nutrition information being required on alcohol containers sold in Canada

We are writing to express support for the recommendation in the Canadian Centre on Substance Use and Addictions' proposed new Low Risk Alcohol Drinking Guidelines (aka [Canadian Guidance on Alcohol and Health](#)) that Health Canada:

“require, through regulation, the mandatory labelling of all alcoholic beverages to list the number of standard drinks in a container, the Guidance on Alcohol and Health, health warnings and nutrition information.”

This recommendation comes from leading scientific experts in the field and Canadians have the right to know about the adverse health risks of consuming alcohol, especially given that it is classified by the WHO as a Class 1 carcinogen.

We also call on the Government of Canada to develop a new Alcohol Act, similar to the existing (W) legal experts

consumers of any risks inherent in the use of a product and provide consumers with adequate information to make an informed choice concerning use of the product. Alcohol products are currently being distributed and sold, often by government agencies, to Canadian consumers without any warnings of the risks.

Health warning labels on alcohol products should provide consumers with adequate (i.e., clear, complete, and current) information to make an informed health decision regarding use of the product. More specifically, an adequate warning should meet the following criteria:

- Communicated clearly and understandably
- Communicated in a manner calculated to inform the user of the nature of the risk and extent of danger
- Communicated in terms commensurate with the gravity of the potential hazard
- Must be explicit
- Should not be neutralized or negated by collateral efforts on the part of the manufacturer.
- Keep abreast of scientific developments
- Warn consumers of new risks

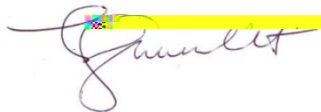
The [Canadian Alcohol Policy Evaluation \(CAPE\) Research](#) team, who have been leaders in the alcohol policy field for over 10 years, have compiled a guidance document on [Evidence-Based Recommendations for Labelling Alcohol Products in Canada](#). Their recommendations include:

- Introduction of mandatory labelling of all alcohol products with health messaging that is inscribed in legislation and set in regulation, rather than voluntary or industry regulatory labelling.
- Representatives of the alcohol industry should not have any input on the legislation, development,

the study support the call to implement mandatory health information on alcohol containers in Canada. Several academic papers have been published on the study and are available [here](#)

[Tobacco](#) and [cannabis](#) products, two other legally regulated psychoactive substances, are already subject to mandatory warning labels and governed by federal Acts. It is time that the Government of Canada, without interference from the alcohol industry, do the same with alcohol, a drug that cost [Canada \\$16.2 billion](#) and was responsible for more than 18,000 deaths in 2017 alone.

Respectfully,



Emily Gruenwoldt
Executive Director,
Pediatric Chairs of Canada



Dr. Andrew Lynk
Chair, Dept of Pediatrics
Dalhousie University

- CC:
- Dr. Angelo Mikrogianakis Chair, Dept of Pediatrics, McMaster University
 - Dr. Anne Monique Nuyt, Chair, Dept of Pediatrics, Université de Montréal
 - Dr. Antonia Stang, Chair, Dept of Pediatrics, University of Calgary
 - Dr. Athena McConnell, Chair, Dept of Pediatrics, University of Saskatchewan
 - Dr. Bethany Foster, Chair, Dept of Pediatrics, McGill University
 - Dr. Craig Campbell, Chair, Dept of Pediatrics, Western University
 - Dr. Jean-Sébastien Tremblay-Roy, Chair, Dept of Pediatrics, Université de Sherbrooke
 - Dr. Justin Jagger, Chair, Dept of Pediatrics, Northern Ontario School of Medicine
 - Dr. Meredith Irwin, Chair, Dept of Pediatrics, University of Toronto
 - Dr. Mona Jabbour, Chair, Dept of Pediatrics, University of Ottawa
 - Dr. Patricia Birk, Chair, Dept of Pediatrics, University of Manitoba
 - Dr. Patrick Daigneault, Chair, Dept of Pediatrics, Université Laval
 - Dr. Paul Dancey, Chair, Dept of Pediatrics, Memorial University
 - Dr. Robert Connelly, Chair, Dept of Pediatrics, Queen's University
 - Dr. Sarah Forgie, Chair, Dept of Pediatrics, University of Alberta
 - Dr. Steven Miller, Chair, Dept of Pediatrics, University of British Columbia

Jennifer Saxe, Director General, Controlled Substances Directorate, Health Canada