October 3, 2022

Hon. Jean-Yves Duclos Minister of Health House of Commons Ottawa, Ontario, Canada K1A 0A6 hcminister.ministresc@hc-sc.gc.ca

Hon. Carolyn Bennett Minister of Mental Health and Addictions House of Commons Ottawa, Ontario, Canada K1A 0A6 <u>mhaminister.ministresmd@hc-sc.gc.ca</u>

Dear Ministers Duclos and Bennett,

The Public Health Association of New Brunswick and Prince Edward Island (PHA-NBPE) members believe in universal and equitable access to the basic conditions that are necessary to achieve health for all.

community health according to the public health principles of disease prevention, health promotion and protection, and healthy public policy As a volunteer-run organization of professionals working in various fields related to public and population health seeking to continuously prevent alcohol related harm and create better health outcomes, PHA-

We at PHA-NBPE, call on the Government of Canada to develop a Federal Alcohol Act, similar to the existing <u>Tobacco</u> and <u>Cannabis</u> Acts, in which alcohol labelling regulations can be developed and strengthened. An Alcohol Act with the purpose to protect public health and considering the conclusive evidence outlining alcohol related harms.

<u>Canadian researchers</u>, including <u>legal experts</u>, have documented how manufacturers have a duty to warn consumers of any risks inherent in the use of a product and provide consumers with adequate information to make an informed decision concerning use of the product. Alcohol products are currently being distributed and sold, often by government agencies, to Canadian consumers without any standardized or evidence informed warnings of the related 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. Remain current in light of scientific developments Warn consumers of new risks

The <u>Canadian Alcohol Policy Evaluation (CAPE) Project</u> research team, who have been leaders in the alcohol policy field for over 10 years, have compiled a guidance document on <u>Evidence-based</u> <u>Recommendations for Labelling Alcohol Products in Canada</u>. 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 self-regulatory labelling
- Representatives of the alcohol industry should not have any input on the legislation, development, placement, content, size, or style of the mandatory health warning messages implemented on alcohol products
- Implementation of rotating display of mandatory front-of-package labels with adequate health warning messages that are reviewed and updated regularly covering six defined topic areas (e.g., cancer risk, other health impacts, violence, pregnancy-related risks, impaired driving, and harms to youth)
- Implementation of static standard drink information (i.e., number of drinks per container)

awareness and knowledge of health risks, number of standard drinks in alcohol containers, and national drinking guidelines which led to a decrease in alcohol consumption. This is the first (and so far only) real-world study on the effectiveness of alcohol warning labels in informing drinkers of the risks of alcohol and reducing consumption