

Digby and Area Community Health Board
Maureen Langsford, Chair
Notification of Draft Regulations Under Section 12 of the Public Health (Alcohol) Act 2018
TRIS NOTIFICATION 2022/441/IRL (Ireland)

Who we are

The Digby and Area Community Health Board is composed of volunteers located around Digby, Nova Scotia, Canada.

Community Health Boards work together to improve health & wellness where we live, work, play and learn. They gather ideas and share information about how to improve and promote health & wellness close to home. They focus on the many factors that affect health & wellness in our communities including income, education and sense of belonging, among others. CHBs share what they have learned about health & wellness priorities with Nova Scotia Health, IWK Health Centre, and community groups, as outlined in the [Health Authorities Act, Section 62](#)

CHBs advocate for actions to promote and improve health & wellness based on what communities say is most important. Guided by their Community Health Plans, they develop partnerships with local community groups and they award Wellness Fund grants to local community projects.

Background

From the [Notification of Draft Regulation](#):

In accordance with Directive (EU) 2015/1535, Ireland notified the European Commission of the draft Public Health (Alcohol) Bill 2015 on 27 January 2016 and amendments to the Bill were notified on 3 February 2018. In relation to the proposals on labelling of alcohol products (section 12 of the Bill) the Commission's response on 2 May 2018 stated that it could not assess the draft measure without more detailed information in relation to its modalities, i.e. the regulations which would provide the detail on how the requirement would operate. The draft regulations attached with this submission are those modalities.

Under section 12 of the Act labels on alcohol products must contain:

- i. A warning to inform people of the danger of alcohol consumption.
- ii. A warning to inform people of the danger of alcohol consumption when pregnant
- iii. A warning to inform people of the direct link between alcohol and fatal cancers.
- iv. The quantity of grams of alcohol contained in the product.
- v. The number of calories contained in the alcohol product
- vi. A link to a health website which gives information on alcohol and related harms.

Our position

We are writing to express support for the Draft Regulation. There is clear evidence that labels containing factual information about alcohol's health harms (including cancers and liver disease), the dangers of consuming alcohol while pregnant, and information on alcohol content and calories, are an effective way to inform Irish consumers of the potential risks of alcohol consumption.

1. Alcohol harms

[The effects of alcohol warning label on population alcohol consumption: An interrupted time series analysis of alcohol sales in Yukon, Canada](#) (Zhao et al., 2020, JSAD)

The labels as outlined in the Draft Regulation are similar to the ones in The Yukon Labelling study, so would be an effective tool for informing drinkers of the risks of alcohol consumption

3. Fulfilling the duty to warn

Researchers at the Canadian Alcohol Policy Evaluation Project (CAPE), including legal experts, [have also 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 choice concerning use