



Canadian Society of Translational Oncology

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development of a Federal Alcohol Act, similar to the existing Tobacco and Cannabis Acts, in which alcohol labelling regulations can be developed and strengthened, we implore the Government of Canada to advance regulations at once. An Alcohol Act and alcohol labelling, with the purpose to protect public health, will consider the conclusive evidence outlining alcohol-related cancer risk.

Canadian researchers, including legal experts, 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 choice concerning use of the product.^{5,6} 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) Project research team, who have been leaders in the alcohol policy field for over 10 years, have compiled a guidance document on alcohol labelling recommendations⁷. Their recommendations include:

- Introduction of mandatory labelling of all alcohol products with health messaging that is inscribc(s)5(cribc)i(ct)-[C88



risks, number of standard drinks in alcohol containers, and national drinking guidelines and led to a decrease in alcohol consumption.^{8,9,10,11} This is the first real-world study on the effectiveness of alcohol warning labels in informing drinkers of the risks of alcohol and reducing consumption. The results of 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 as part of the Northern Territories Alcohol Labels Study.¹²

It is time that the Government of Canada, without interference from the alcohol industry, develops a Federal Alcohol Act, a drug that costs Canada \$16.6 billion and was responsible for more than 18,000 deaths in 2017 alone¹³ and 3,300 new cancer cases in 2015.¹⁴

The advancement of public health policy, including Federal Alcohol Act regulating alcohol labelling and other alcohol policies, is a key step toward reducing alcohol-related cancer risk and improving health outcomes in Canada.

We appreciate your care for the health of Canadians.

Sincerely,

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⁸ <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.249>

⁹ <https://pubmed.ncbi.nlm.nih.gov/33078447/>

¹⁰ <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.262>

¹¹ <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.225>

¹² Canadian Institute for Substance Use Research. (2022). Northern Territories Alcohol Labels Study