



EPHA Submission - TRIS Notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.

20 September 2022

The European [Public Health Alliance](#) (EPHA) is a leading European civil society alliance in Brussels, made up of 80 public health NGOs, patient groups, health professionals and disease groups, working to improve health and strengthen the voice of public health in Europe.

Within that mandate, EPHA stresses the urgent need for concrete actions to tackle alcohol-related harm, including by adding labels to alcoholic beverages. EPHA supports the Irish government's legislation on labelling of alcohol products, and the modalities of the Draft Regulations, which include clear consumer and product information and health warnings both on-product and alcohol licensed premises. This could set the example for the rest of the EU¹.

EPHA supports the endeavours and contributions by [Alcohol Action Ireland](#) (AAI)² including the submission of [European Alcohol Policy Alliance](#) (Eurocare)³ and the position of [IOGT-NTO](#)⁴. In EPHA's view, Ireland has taken serious steps to ensure the protection and wellbeing of all its citizens and to promote public health. National legislation on alcohol labelling will contribute to consumers awareness and help people make informed choices, which is a necessary step for better health. Voluntary initiatives, often advocated for by the industry, have repeatedly shown to fail and to not serve the public interest, but support commercial gains.

EPHA's public health advocacy on labelling of alcohol products is evidence-based and structured as following:

1. Every consumer has the right to accurate **health information** so they can make informed decisions about the health harms of alcohol use. This principle resonates and is supportive of a future direction that lies within a revision of the **EU Regulation No.1169/11** and the policy proposal emanating from [Europe's Beating Cancer Plan](#)⁵.
2. Ireland has identified public health concerns around patterns of harmful use of alcohol. The Irish parliament, and its elected government, have democratically enacted legislation which provides a proportionate response, mindful of minor commercial inconveniences, to improve **health literacy** among the drinking population. This is also a recognition of a Member State's competency to adopt measures requiring **mandatory alcohol labelling** on grounds of the protection of public health.
3. In the **Global Strategy to reduce the harmful use of alcohol**⁶, the World Health Organisation (WHO) recognises the importance of alcohol labelling and therein calls for the provision of information for consumers about the harm related to alcohol by labelling alcoholic beverages to indicate such risks.



4. There has been significant opposition by the global alcohol industry to Ireland's progressive public health initiative to **reduce alcohol use**. However, given the significant burden to individuals, families and communities, and the public purse, of **alcohol related harm** in Ireland, it is now imperative that this public health measure is implemented, nearly a decade after it was approved.
5. The **tobacco labelling experience** suggests that well-designed warning labels are effective in **decreasing consumption** and help raise **public health awareness**. A cross sectional study of people who drink alcohol from 29 countries, which provides global comparisons of responses to alcohol health information labels shows that in all these countries, cancer labels was newest and most likely to change behaviour⁷. The provision of such health information on alcohol product labels will play a role in raising awareness of the risk of alcohol drinking.
6. All endeavours aimed at establishing a set of rational controls to address alcohol harm such as labelling, taxation, price, promotion (marketing), and product placement are needed to support public health.

EPHA supports the proposed action:

The Public Health Alcohol Act, 2018 is a broad public health evidence-based policy response to Ireland's persistent societal difficulty with alcohol use and related harm. It endeavours to establish a set of coherent controls on alcohol price, promotion, and placement to aid a whole of population reduction in harmful use of alcohol.

In addition, it seeks to improve health literacy among the drinking population who research shows have limited awareness and understanding of the inherent risk to their health and wellbeing from alcohol use.

Section 12 of the Public Health (Alcohol) Act states that labels on alcohol products will have to detail:

- A warning to inform the public of the danger of alcohol consumption.
- A warning to inform the public of the danger of alcohol consumption during pregnancy.
- A warning to inform the public of the direct link between alcohol and fatal cancers
- The quantity in grams of alcohol contained in the product.
- The energy value expressed in kilojoules and kilocalories.
- Details of a website, providing public health information in relation to alcohol consumption.

Further, these provisions also provide that those selling alcohol in on-licensed premises will be required to display a notice containing the same health warnings, a link to the public health website and an indication to the customer of the alcohol and calorie content of all drinks made available.



EPHA therefore, strongly supports the Irish government's legislation on alcohol labelling and calls on the European Commission to issue an opinion in support of the Irish Public Health (Alcohol) Act.



(Copied image from Alcohol Action Ireland 's submission, showing visual sample for the proposed on-product labels)

References

¹ EPHA submission on TRIS Notification 2022/441/IRL (Ireland) [TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.](#)

² Alcohol Action Ireland (AAI) Contribution to the TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018. [Submission of 06-09-2022]

³ European Alcohol Policy Alliance (Eurocare) Position on Notification of Draft Regulations Under Section 12 of the Public Health (Alcohol) Act 2018 TRIS Notification Number: 2022/441/IRL [Submission of 09-09-2022]

⁴ Contribution by IOGT-NTO on the TRIS Notification Number: 2022/441/IRL of Draft Regulations Under Section 12 of the Public Health Alcohol Act 2018 [Submission of 19-09-2022]

⁵ Europe's Beating Cancer Plan
https://ec.europa.eu/commission/presscorner/detail/en/ip_21_342

⁶ Global strategy to reduce the harmful use of alcohol. World Health Organization 2010.
<https://www.who.int/publications/i/item/9789241599931>, [Accessed 19-0922]

⁷ Global comparisons of responses to alcohol health information labels:
<https://www.sciencedirect.com/science/article/abs/pii/S030646032200096X>
[Accessed 19-0922]