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Irish Medical Organisation Contribution to the TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.

About the IMO and Alcohol Control Advocacy

The Irish Medical Organisation (IMO) is the trade union and representative body for all Doctors in Ireland. For many years, the IMO has consistently advocated for policies and legislation regarding alcohol control and consumption, given that it is a major public health issue in Ireland¹ and globally.²

In line with this advocacy, and as a member of the Alcohol Health Alliance Ireland, the IMO supports the Draft Regulations by the Irish government for product and consumer information and health warnings both on alcohol products and in on-licensed premises selling alcohol.

Alcohol – a problem for public health

As a major public health issue³ alcohol consumption is directly associated with over 60 acute and chronic conditions, ranging from accidents and alcohol poisoning to liver cirrhosis,⁴ certain cancers,⁵ cardiovascular disease and mental health disorders. For ill health, it ranks

¹ Lesch, M. and McCambridge, J., 2022. A long-brewing crisis: The historical antecedents of major alcohol policy change in Ireland. *Drug and Alcohol Review*, 41(1), pp.135-143.

² Burton, R. and Sheron, N., 2018. No level of alcohol consumption improves health. *The Lancet*, 392(10152), pp.987-988.

³ Jané-Llopis, E., Kokole, D., Neufeld, M., Hasan, O.S. and Rehm, J., 2020. *What is the current alcohol labelling practice in the WHO European Region and what are barriers and facilitators to development and implementation of alcohol labelling policy?* World Health Organization. Regional Office for Europe.

⁴ Tsochatzis, E.A., Bosch, J. and Burroughs, A.K., 2014. Liver cirrhosis. *The Lancet*, 383(9930), pp.1749-1761.

⁵ there is a proven, causal link between the consumption of alcohol and certain cancer including cancer of the mouth, pharynx, larynx, esophagus, liver, bowel, and female breast.

as the 7th leading global risk factor and 3 million deaths worldwide were attributed to alcohol consumption in 2016, representing 5.3% of all deaths worldwide.⁶ Captured using the disability-adjusted life year (DALYs) – a measure that combines years of life lost due to premature mortality, time lived in states in less than full health, or due to disability – alcohol use was estimated to have caused 99.2 million DALYs in 2016, accounting for 4.2% of total DALYs that year.⁷

While irregular and chronic heavy drinking are detrimental to cardiovascular health,⁸ the negative effects are not just observable with heavy alcohol consumption. Health risk steadily increases with greater volumes of alcohol consumption, illustrating a dose-dependent relationship. With moderate consumption too, there is an increased risk of blood pressure and stroke.⁹ Consumption of alcohol is also linked with a broad range of mental health disorders, including depression.¹⁰ As a major risk factor, alcohol intake increases risk of liver cirrhosis with women disproportionately affected.¹¹

Similarly, during pregnancy, research has shown that even moderate alcohol intake can impact the health of the infant.¹² It is estimated globally that around 10% of expectant mothers consume alcohol during pregnancy. This includes time when an expectant mother may yet be unaware of her pregnancy. One in 67 women who consume alcohol during pregnancy will deliver a child with Fetal Alcohol Syndrome (FAS), a condition associated with a wide range of effects including prenatal or postnatal growth, cognitive, emotional, and adaptive functioning deficits, and characteristic dysmorphic facial features.¹³ For every child born with FAS, a further 9 -10 cases are born with another Foetal Alcohol Spectrum Disorder, a risk of 1 in 13 for women who consume alcohol in pregnancy.

⁶ World Health Organization, 2019. *Global status report on alcohol and health 2018*. World Health Organization.

⁷ Degenhardt, L., Charlson, F., Ferrari, A., Santomauro, D., Erskine, H., Mantilla-Herrera, A., Whiteford, H., Leung, J., Naghavi, M., Griswold, M. and Rehm, J., 2018. The global burden of disease attributable to alcohol and drug use in 195 countries and territories, 1990–2016: a systematic analysis for the Global Burden of Disease Study 2016. *The Lancet Psychiatry*, 5(12), pp.987-1012.

⁸ Rehm, J., Gmel Sr, G.E., Gmel, G., Hasan, O.S., Imtiaz, S., Popova, S., Probst, C., Roerecke, M., Room, R., Samokhvalov, A.V. and Shield, K.D., 2017. The relationship between different dimensions of alcohol use and the burden of disease—an update. *Addiction*, 112(6), pp.968-1001.

⁹ Millwood, I.Y., Walters, R.G., Mei, X.W., Guo, Y., Yang, L., Bian, Z., Bennett, D.A., Chen, Y., Dong, C., Hu, R. and Zhou, G., 2019. Conventional and genetic evidence on alcohol and vascular disease aetiology: a prospective study of 500 000 men and women in China. *The Lancet*, 393(10183), pp.1831-1842.

¹⁰ Boden, J.M. and Fergusson, D.M., 2011. Alcohol and depression. *Addiction*, 106(5), pp.906-914.

¹¹ Rehm, J., Taylor, B., Mohapatra, S., Irving, H., Baliunas, D., Patra, J. and Roerecke, M., 2010. Alcohol as a risk factor for liver cirrhosis: a systematic review and meta-analysis. *Drug and alcohol review*, 29(4), pp.437-445.

¹² R. E. Little et al., 'Fetal Growth and Moderate Drinking in Early Pregnancy' in the *American Journal of Epidemiology*, Vol. 123, Issue 2, 1986, pp. 270-278.

¹³ Popova, S., Lange, S., Probst, C., Gmel, G. and Rehm, J., 2017. Estimation of national, regional, and global prevalence of alcohol use during pregnancy and fetal alcohol syndrome: a systematic review and meta-analysis. *The Lancet Global Health*, 5(3), pp.e290-e299.

Consumption in Ireland

In Ireland, in 2020 Irish people aged 15 and over drank 10.07 litres of pure alcohol per capita.¹⁴ Given that around 1 in 4 Irish people abstain from alcohol completely, this equates on average to an individual drinking 574 pints of beer or 149 bottles of wine per year. This is particularly high also when compared to the OECD recorded per capita consumption of 9.1 litres and worldwide consumption of 6.2 litres.¹⁵ An alcohol per capita consumption of about 6.2 litres per annum is needed in Ireland for average low risk alcohol drinking at population level.

Alcohol-related harm is of even greater concern when high levels of heavy episodic drinking (binge drinking) is in addition to such volumes of alcohol consumption. In Ireland, research suggests that monthly and occasional binge drinkers accounted for 62% of all drinkers in Ireland, with this cohort consuming 70% of the alcohol and accounting for 59% of the harms in the population.¹⁶

Consequences of Alcohol Consumption in Ireland

In terms of the health burden, the Global Burden of Disease attributed 5% of all deaths in Ireland to alcohol.¹⁷ One study suggested that on average 3 deaths from alcohol were reported per day in Ireland during 2008-2017.¹⁸ In contrast, Alcohol Action Ireland, using GBD estimates, suggest this is a lower estimate of alcohol-related mortality (given stringent rules on recording cause of death) and posit that 4 deaths per day occurred in Ireland in 2019 that were attributable to alcohol.¹⁹

Parallel to mortality, there were 121,919 hospital discharges from partially alcohol attributable conditions between 2012 and 2017, with 87% of such discharges were male.

Since 1995, those discharged with alcohol liver disease has increased by 221% to 90.8 per 100,000 persons per year. This equates to over 4,000 people per year currently, with such increases most pronounced for those age 15-34 years and 65 years of age or over.²⁰

In addition, Ireland has the highest rate of alcohol consumption during pregnancy globally, with an estimated 60.4% of women consuming alcohol during pregnancy. A more recent

¹⁴ [Irish Revenue 2020 -Net Duty Paid Quantities](#)

¹⁵ OECD/European Union (2020), Health at a Glance: Europe 2020: State of Health in the EU Cycle, OECD Publishing, Paris, <https://doi.org/10.1787/82129230-en>

¹⁶ Doyle, A., 2021. Alcohol consumption, alcohol-related harm, and alcohol policy in Ireland. *Drugnet Ireland*, pp.1-8.

¹⁷ Collaborators, G.B.D. and Ärnlöv, J., 2020. Global burden of 87 risk factors in 204 countries and territories, 1990–2019: a systematic analysis for the Global Burden of Disease Study 2019. *The Lancet*, 396(10258), pp.1223-1249.

¹⁸ Doyle, A., 2021. Alcohol consumption, alcohol-related harm, and alcohol policy in Ireland. *Drugnet Ireland*, pp.1-8.

¹⁹ Alcohol Action Ireland. 2022. Global Burden of Disease. Estimates of alcohol use and attributable burden in Ireland.

²⁰ Doyle, A (2021) Alcohol consumption, alcohol-related harm, and alcohol policy in Ireland. *Drugnet Ireland*, Issue 78, Summer 2021, pp. 1-8.

study suggests consuming alcohol during pregnancy is even more prevalent.²¹ In line with this, Ireland has the 3rd highest prevalence of FAS with 89.7 per 10,000.²²

This combined with research highlighting that 15% of the Irish population over the age of 15 has an Alcohol Use Disorder²³ demonstrates the need to implement the Public Health (Alcohol) Act 2018 in full to address alcohol consumption and harm from alcohol.

Context of Labelling Provision

The Public Health Alcohol Act, enacted in 2018, provides a range of legislative measures in relation to alcohol including minimum unit pricing, requirements on the content of advertisements, restrictions on advertising during events, and the prohibition on advertising in certain places, among others. Through such provisions, its key aim is to reduce alcohol consumption Ireland and alcohol-related harm.²⁴ With this, there is a particular emphasis on reducing harm caused to young people and children, who are particularly vulnerable to the effects of alcohol advertising, including alibi marketing, whereby the alcohol industry advertise openly 0% alcohol products in the same packaging as the alcohol product.

Under section 12 of the Act, the focus of this submission, 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.

In addition to labelling products, 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 that the alcohol and calorie content of all drinks is available.

²¹ O'Keeffe, L.M., Kearney, P.M., McCarthy, F.P., Khashan, A.S., Greene, R.A., North, R.A., Poston, L., McCowan, L.M., Baker, P.N., Dekker, G.A. and Walker, J.J., 2015. Prevalence and predictors of alcohol use during pregnancy: findings from international multicentre cohort studies. *BMJ open*, 5(7), p.e006323.

²² Popova, S., Lange, S., Probst, C., Gmel, G. and Rehm, J., 2017. Estimation of national, regional, and global prevalence of alcohol use during pregnancy and fetal alcohol syndrome: a systematic review and meta-analysis. *The Lancet Global Health*, 5(3), pp.e290-e299.

²³ defined according to the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5) criteria. It is a maladaptive pattern of alcohol use leading to clinically significant impairment or distress, as manifested by 2 or more of the following 11 criteria occurring at any time in the last 12 months: role impairment; hazardous use; social problems; tolerance; withdrawal; longer or more use than intended; unsuccessful attempts to quit/cut down; much time spent using alcohol; reduced activities because of drinking; continued drinking despite psychological or physical problems; and alcohol cravings.

²⁴ O'Dwyer, C., 2019. Public Health (Alcohol) Act 2018 *Drugnet Ireland*, pp.6-8.

In this regard, the aim of product and consumer information and health warnings both on alcohol products and in on-licensed premises selling alcohol is to ensure that consumers have a right to know what they are drinking and of the potential consequences of consuming alcohol. Providing comprehensible nutritional information such as energy content allows consumers to better monitor their diets and makes it easier for them to maintain a healthy lifestyle.²⁵ Alcohol contains a considerable number of calories with an energy content of 7.1 kilocalories per gram.²⁶ Alcoholic beverages are also rich in sugar, which contains 4 kilocalories per gram, and frequently have added sugars. This, alongside the harmful effects of alcohol noted in this document, may be unclear to consumers, if there is not sufficient information on the label.

The Impact of Labelling Internationally

As demonstrated by public health policy evidence internationally²⁷, labelling is an effective way of raising awareness of the health-related consequences of alcohol consumption.

Demonstrated also by the health warnings on tobacco products internationally, a large and significant body of evidence show that while small or obscure text-only warnings have negligible impact, more prominent health warnings on the face of tobacco products prove to be an effective source of health information. In this regard, they are effective in educating the public about the negative effects of cigarettes and encouraging people who smoke to quit.²⁸²⁹³⁰

Similar research suggests positive consumer diet behaviours when effective food labelling is evident, with a meta-analysis of food labeling effects highlighting that across 11 countries, food labeling decreases consumer intake.³¹

In relation to current research on the effects of alcohol labelling, findings from Australia posit that a multiplicity of warnings applied to various public education contexts are likely to have most impact and should be repeated across product labels, notices in licenced premises, websites selling alcohol and included in any advertisements for alcohol

²⁵ World Health Organisation. 2022. Alcohol labelling: A discussion document on policy options

²⁶ European Public Health Alliance. 2016. Briefing Paper: Self-Regulation: A False Promise for Public Health.

²⁷ Sambrook Research International, 2009. A review of the science base to support the development of health warnings for tobacco packages.

²⁸ Borland R, Yong H-H, Wilson N, et al. How reactions to cigarette packet health warnings influence quitting: findings from the ITC Four-Country survey. *Addiction*. 2009 April ; 104(4): 669–675

²⁹ Fong GT, Hammond D, Hitchman SC. The impact of pictures on the effectiveness of tobacco warnings. *Bull World Health Org* 2009;87(8):640–3

³⁰ Azagba S, Sharaf MF. The effect of graphic cigarette warning labels on smoking behavior: evidence from the Canadian experience. *Nicotine Tob Res* 2013;15(3):708–17.

³¹ Shangquan, S., Afshin, A., Shulkin, M., Ma, W., Marsden, D., Smith, J., Saheb-Kashaf, M., Shi, P., Micha, R., Imamura, F. and Mozaffarian, D., 2019. A meta-analysis of food labeling effects on consumer diet behaviors and industry practices. *American journal of preventive medicine*, 56(2), pp.300-314.

products.³² Similarly, research of Canadian consumers illustrates that explicit health warnings on alcohol containers and promotional materials are a low-cost counter advertising strategy that can raise awareness of health issues and has the potential to discourage drinking while pregnant or from drink-driving.

In such instances of labelling, the most dominant visual element is brought to the attention of the consumer and then sequentially progresses to other elements in order of their visual dominance. Location on container, font, size, colour, use of imagery, clarity and memorability of message, and simplicity of language used are all useful elements in achieving a level of visual dominance required of an effective health warning.³³

Conclusion

While there has been advancements in healthcare legislation and enforcement e.g. drink driving regulations, given the evident and continued links between alcohol consumption and alcohol-related harm/ alcohol-attributed death rate in Ireland, the implementation of the Public Health (Alcohol) Act 2018 is required in full.

The IMO supports the full implementation of the Public Health (Alcohol) Act 2018, with the expansion of provisions in relation to labelling alcohol products, showing product and consumer information and health warnings both on-product and alcohol licensed premises as a key means in a range of provisions intended to reduce alcohol consumption and alcohol-related harm in Ireland.

³² Pettigrew S, Jongenelis MI, Glance D et al. The effect of cancer warning statements on alcohol consumption intentions. *Health Educ Res* 2016;31(1):60–9.

³³ Hammond, D., 2011. Health warning messages on tobacco products: a review. *Tobacco control*, 20(5), pp.327-337.