



Brussels, 19 July 2018

## European doctors on the Irish Public Health (Alcohol) Bill 2015

Contribution to the European Commission's Technical Regulation Information System (TRIS) database

[The Standing Committee of European Doctors \(CPME\)](#) represents national medical associations across Europe. CPME is committed to contributing the medical profession's point of view to EU institutions and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

We welcome the propositions by the Irish Government addressing alcohol related harm. The Public Health (Alcohol) Bill is an important piece of legislation tackling Ireland's harmful relationship with alcohol<sup>1</sup>. It aims to reduce the damage that alcohol causes to individuals, families and society, with an emphasis on protecting children and young people from alcohol harm. Its goal is to reduce the per capita alcohol consumption from 11 litres to 9.1 litres for every person aged 15 and over by 2020. The Bill includes *i.a.* health warnings on labels and stricter regulation on alcohol marketing.

CPME believes that attaching warning labels to packaging is effective. Product labels can serve several purposes: providing information about the product to the consumer, enticing the consumer to buy the product and alerting consumers about the dangers and health risks of the product. Labelling has been shown to be an effective mean of raising awareness of the health-related consequences of alcohol consumption, which is perhaps unsurprising given the frequently demonstrated efficacy of this measure in tobacco public health policy internationally. Research of health warnings displayed on tobacco products show that whereas small or obscure text-only warnings seem to have minimal impact, prominent health warnings on the face of containers serve as an effective source of health information.<sup>23</sup>

Moreover, alcohol is one of the few substances linked to an increased risk of cancer<sup>4</sup>. Therefore, CPME supports the proposal to introduce cancer warning labels. Alcohol is classified as a group 1 carcinogen by the WHO's International Agency for Research on Cancer (IARC)<sup>5</sup> as there is a proven, causal link between

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<sup>1</sup> Mongan D, Reynolds S, Fanagan S and Long J. Health-related consequences of problem alcohol use. *Overview 6 Dublin: Health Research Board 2007: 45-46* (Irish adults are one of the highest per capita consumers of alcohol in Europe consuming approximately 11.0 litres per capita. Alcohol is associated with more than 60 acute and chronic health disorders ranging from accidents and assaults to mental health problems, cardiovascular disease, liver cirrhosis and certain cancers. While chronic conditions more often affect older people, acute conditions are more prevalent amongst younger people).

<sup>2</sup> Hammond D. Health warning messages on tobacco products: a review in *Tobacco Control*, Vol. 20, May 2011, pp. 327-337.

<sup>3</sup> Sambrook Research International, A review of the science base to support the development of health warnings for tobacco packages, Newport, 2009, pp. 7-12.

<sup>4</sup> [United European Gastroenterology \(UEG\) report: Digestive Health Across Europe \(2018\)](#); Schutze M. Et al Alcohol attributable burden of incidence of cancer in Eight European Countries based on results from Prospective Cohort Study. *BMJ*; 2011; 342: d1584 in Clarke N. Et al. A report on the Excess Burden of Cancer Among Men in the Republic of Ireland, Centre for Men's Health, Institute of Technology Carlow; 2013 for the Irish Cancer Society; Laffoy M, McCarthy T, Mullen L, Byrne D, Martin J. Cancer incidence and mortality due to alcohol: an analysis of 10-year data. *Ir Med J*. 2013;106(10):294-7.

<sup>5</sup> WHO's International Agency for Research on Cancer (IARC). [List of classifications](#).



alcohol and several types of cancer, including cancer of the mouth, pharynx, larynx, oesophagus, liver, bowel and female breast. Even low levels of alcohol intake are associated with a risk of cancer.

CPME also believes that stricter controls in alcohol advertising with a view to protecting children and young people are beneficial. In our position on the EU Audiovisual Media Services Directive<sup>6</sup>, we have proposed to prohibit commercial communications for alcoholic beverages to limit the exposure of children and minors. Exposure to alcohol advertising increases the likelihood that young people start drinking at an early age, and to drink more once older. Furthermore, CPME recognises that broadcasting watershed is a well-known and effective measure utilised by many European countries to protect children from harmful TV marketing.

Irish authorities have taken appropriate steps to alert and inform the public about the dangers of alcohol and its proven relation to several types of cancer. Health is a public interest and must be respected in policy making. It is our hope that the European Union institutions and its Member States will allow Ireland to put the health of their citizens above profits of the alcohol industry.

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<sup>6</sup> [CPME Position on the Proposal for a Directive amending Audio-Visual Media Services Directive 2010/13/EU \(2016\)](#)