

CPME Submission to the Food Safety Authority of Ireland Consultation in Respect of  
Regulations Under Sections 12 and 13 of the Public Health (Alcohol) Act 2018

Brussels, 27 September 2019

[The Standing Committee of European Doctors \(CPME\)](#) represents national medical associations across Europe, including the Irish Medical Organisation. CPME reaffirms its commitment to contributing to the fight against alcohol-related harm and encourages European doctors to act, both in direct patient contact and through their national medical associations.

CPME supports the measures contained in the Irish Public Health (Alcohol) Act 2018 and welcomes the opportunity to submit expert research on the effectiveness of including relevant health warnings and information on the labels of alcohol products, on notices in licensed premises, in documents required for alcohol sold in reusable containers and on websites that sell alcohol products, as well as in advertisements for alcohol products.

### **Health Warnings**

Labelling has been shown to be an effective way to raise awareness of the health-related consequences of alcohol consumption as demonstrated by the efficacy health warnings on tobacco products internationally. Evidence shows that the size and graphic nature of cigarette health warnings has been effective in educating the public about the negative effects of cigarettes and encouraging smokers to quit.<sup>i ii iii</sup> Similar health warnings have the potential to change consumer perceptions of alcohol products.<sup>iv v vi</sup> Cancer warnings and warnings related to alcohol consumption during pregnancy have the potential to inform consumers of the long-term health impacts and encourage behavioural change.<sup>vii viii</sup> The multiplicity of warnings applied to various public education contexts are likely to have most impact<sup>ix</sup> and should be repeated across product labels, notices in licensed premises, websites selling alcohol and included in any advertisements for alcohol products.

Research on health warnings displayed on tobacco products shows 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>x</sup> When viewing containers or packages, the attention of consumers is drawn to the most dominant visual element, and generally progresses sequentially to other elements in order of their visual dominance.<sup>xi</sup> Useful elements in achieving a level of visual dominance required of an effective health warning include: font; location on container; size; colour; use of imagery; clarity and memorability of message; and simplicity of language used.<sup>xii</sup>

Examining the research on alcohol labelling, the World Health Organisation (WHO)<sup>xiii</sup> found that four message components should be considered when developing effective health labels: (i) signal word to attract attention; (ii) identification of the problem; (iii) explanation of the consequences if exposed to

the problem; and (iv) instructions for avoiding the problem. Also, visual impact can be enhanced by using large, bold print; high contrast; colour; borders; and pictorial symbols.

### **Energy, Ingredients and Nutritional Values**

Given the high calorie and sugar content of alcoholic beverages, the labelling of alcohol products with comprehensible information on energy and nutritional content is essential to allow consumers to make informed and healthier choices.<sup>xiv</sup> EU Regulation 1169/2011 on the provision of food information to consumers demands that all foodstuffs display ingredients and nutritional values on their packaging<sup>xv</sup> and there is no reason why alcohol products should be treated any differently.

CPME has called on the European Commission and the European co-legislators to end the exemption of alcoholic beverages from EU Regulation 1169/2011. CPME also supports the right of national governments to take initiatives to increase public health by including additional labelling information such as health warnings.

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<sup>i</sup> 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

<sup>ii</sup> 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

<sup>iii</sup> 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.

<sup>iv</sup> Al-hamdani M, Smith S. Alcohol warning label perceptions: Emerging evidence for alcohol policy. *Can J Public Health*. 2015 Oct 3;106(6):e395-400

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

<sup>vi</sup> S. Glock and S. Krolack-Schwerdt, 'Changing Outcome Expectancies, Drinking Intentions, and Implicit Attitudes toward Alcohol: A Comparison of Positive Expectancy-Related and Health-Related Alcohol Warning Labels' in *Applied Psychology: Health and Well-Being*, Vol. 5, Issue 3, November 2013, pp. 332-347;

<sup>vii</sup> 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..

<sup>viii</sup> S. M. Parackal, M. K. Parackal, and J. A. Harraway, 'Warning labels on alcohol containers as a source of information on alcohol consumption in pregnancy among New Zealand women' in the *International Journal on Drug Policy*, Vol. 21, Issue 4, July 2010, pp. 302-305;

<sup>ix</sup> 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..

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

<sup>xi</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 [available at [http://www.drugsandalcohol.ie/20646/1/A\\_review\\_of\\_the\\_science\\_base\\_to\\_support\\_warnings\\_for\\_\\_tobacco.pdf](http://www.drugsandalcohol.ie/20646/1/A_review_of_the_science_base_to_support_warnings_for__tobacco.pdf) (accessed on 19 February 2015 at 11.31am)].

<sup>xii</sup> Ibid.

<sup>xiii</sup> World Health Organisation –Europe (WHO) Alcohol Labelling - A discussion document on policy options Copenhagen 2017

[http://www.euro.who.int/\\_data/assets/pdf\\_file/0006/343806/WH07\\_Alcohol\\_Labelling\\_full\\_v3.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0006/343806/WH07_Alcohol_Labelling_full_v3.pdf?ua=1)

<sup>xiv</sup> CPME 2018, CPME Policy on Alcohol Labelling November 2018 (CPME2018/055 FINAL) downloaded from

[http://doc.cpme.eu/adopted/2018/CPME\\_AD\\_Board\\_10112018\\_055\\_FINAL\\_EN\\_CPME.Policy.on.Alcohol.Labelling.pdf](http://doc.cpme.eu/adopted/2018/CPME_AD_Board_10112018_055_FINAL_EN_CPME.Policy.on.Alcohol.Labelling.pdf).

<sup>xv</sup> Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers (European Parliament & European Council, 2011)