



Canadian Cancer Society
Société canadienne du cancer

February 22, 2023

Hon. Jean-Yves Duclos
Minister of Health
House of Commons
Ottawa, Ontario, Canada K1A 0A6
hcminister.ministresc@hc-sc.gc.ca

Hon. Carolyn Bennett
Minister of Mental Health and Addictions
House of Commons
Ottawa, Ontario, Canada K1A 0A6
mhaminister.ministresmd@hc-sc.gc.ca

Re: Mandatory warning labels on alcohol containers sold in Canada

Dear Ministers Duclos and Bennett,

As the country's largest national charitable funder of research into all types of cancer, the Canadian Cancer Society (CCS) works tirelessly to save and improve lives. CCS plays a key role in advocating for evidence-informed healthy public policies that will help create vibrant and healthy communities by preventing cancer and better supporting those living with the disease. A Federal Alcohol Act which includes mandatory alcohol warning labels is integral to reducing alcohol-related harm, particularly the risk of developing cancer and improving health outcomes in Canada.

On behalf of CCS, we are writing to express support for the Canadian Centre on Substance Use and Addictions' recently released *Canada's Guidance on Alcohol and Health: Final Report*¹:

An effective policy change could be the mandatory labelling of all alcoholic beverages with the number of standard drinks in a container, Canada's Guidance on Alcohol and Health and health warnings.

This alcohol policy priority comes from leading scientific experts. Alcohol is classified as a Group 1 carcinogen by the International Agency for Research on Cancer (IARC)² and is estimated to be one of the top 3 causes of cancer deaths worldwide. Drinking any type of alcohol – beer, wine, or spirits – increases your risk of at least 9 different types of cancers including breast, colorectal, esophageal, laryngeal, liver, mouth, pharyngeal, stomach and pancreatic cancers. Evidence indicates regular alcohol consumption over time – even at low levels – increases the risk of developing alcohol-associated cancer. Yet, over 40% of Canadians are not aware that alcohol consumption increases the risk of cancer. Canadians deserve access to the best available information on the adverse health risks of alcohol consumption to make an informed decision about their health.

Currently, Canada has federal Acts for tobacco and vaping products and cannabis.^{3,4} Commonly stated in the defined purpose of these Acts is to prevent the public from being deceived or misled with respect to health hazards, and to enhance public awareness about the hazards.

Under the Food and Drugs Act, the Government has the authority to move forward with alcohol labelling immediately including standard drink labelling and health warning labels. While we at CCS support the

¹ CCSA: https://ccsa.ca/sites/default/files/2023-01/Canada%27s%20Guidance%20on%20Alcohol%20and%20Health%20Final%20Report_1.pdf

² IARC: <http://monographs.iarc.fr/ENG/Monographs/vol44/volume44.pdf>

³ <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2000-272/page-1.html#h-662300>

⁴ <https://www.canada.ca/en/health-canada/services/cannabis-regulations-licensed-producers/packaging-labelling-guide-cannabis-products/guide.html#a72>



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 inscribed in legislation and set in regulation, rather than voluntary or industry self-regulatory labelling.
- Representatives of the alcohol industry should not have any input on the legislation, development, placement, content, size, or style of the mandatory health warning messages implemented on alcohol products.
- Implementation of rotating display of mandatory front-of-package labels with adequate health warning messages that are reviewed and updated regularly covering six defined topic areas (e.g., cancer risk, other health impacts, violence, pregnancy-related risks, impaired driving, and harms to youth).
- Implementation of static standard drink information (i.e., number of drinks per container) paired with forthcoming Canada's Guidance on Alcohol and Health.
- Label components should be prominently displayed on the container in terms of their proportion of the display panel, legibility, contrasting colours, and supporting pictorials.
- Nutrition information in the form of a mandatory simplified nutrition facts table with calorie content should be provided on all alcohol products.

Further, the findings of the Yukon Labelling Study, one of the best-known studies on the effectiveness of alcohol warning labels, showed that alcohol labels led to an increase in consumer awareness and knowledge of health

⁵ T Stockwell, R Solomon, P O'Brien et al. (2020). Cancer Warning Labels on Alcohol Containers: A Consumer's Right to Know, A Government's Responsibility to Inform, and an Industry's Power to Thwart. *Journal of Studies on Alcohol and Drugs* 81(2):284-292.

⁶ JJ Shelley. (2021). A Reflection on the Duty to Warn After Letourneau vs JTI-MacDonald: A Future Obesity Litigation in Canada? *McGill Journal of Law and Health* 14(2): 255-310.

⁷ Canadian Alcohol Policy Evaluation (CAPE) 3.0 Project Team. (2022). Evidence-based recommendations for labelling of alcohol products in Canada. <https://www.uvic.ca/research/centres/cisur/assets/docs/cape/cape-evidenced-based-recommendations-for-labelling-of-alcohol-products-in-canada.pdf>



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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,

Andrea Seale
Chief Executive Officer
Canadian Cancer Society

Kelly Masotti
Vice President, Advocacy
Canadian Cancer Society

CC: Jennifer Saxe
Director General
Controlled Substances Directorate
Health Canada
Ottawa, Ontario, Canada K1A 0K9
Jennifer.saxe@hc-sc.gc.ca

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. Available at:

<https://www.uvic.ca/research/centres/cisur/projects/active/projects/northern-territories-alcohol-study.php#acc-journal-articles>

¹³ Canadian Substance Use Costs and Harms Scientific Working Group. (2020). Canadian substance use costs and harms 2015–2017. (Prepared by the Canadian Institute for Substance Use Research and the Canadian Centre on Substance Use and Addiction.) Ottawa, Ont.: Canadian Centre on Substance Use and Addiction.

¹⁴ X Grevers, Y Ruan, AE Poirier, SD Walter, PJ Villeneuve, CM Friedenreich, DR Brenner on behalf of the ComPARE study team. (2019). Estimates of the current and future burden of cancer attributable to alcohol consumption in Canada. *Preventive Medicine* 122: 40–48.