



February 22, 2023

Senate of Canada  
Ottawa, Ontario,  
K1A 0A6

**Re: Support for 'Bill S-254 An Act to amend the Food and Drugs Act (warning label on alcoholic beverages)'**

Dear Honorable Senator,

On behalf of the Canadian Cancer Society (CCS), I am writing to express support for the bill put forward by the Honorable Senator Brazeau at the 44<sup>th</sup> Parliament, 1<sup>st</sup> Session, Bill S-254 An Act to amend the Food and Drugs Act (warning label on alcoholic beverages) calling on the federal government of Canada to implement alcohol warning labels.<sup>1</sup>

We ask that you please support Bill S-254 and the implementation of federally mandated labels on all alcohol containers sold in Canada to better inform your constituents about the health risks of alcohol. This is especially important given that over 40% of Canadians are not aware that alcohol consumption increases the risk of cancer. Alcohol is classified as a Group 1 carcinogen by the International Agency for Research on Cancer (IARC).<sup>2</sup> Drinking any type of alcohol increases an individual's risk for at least 9 different types of cancer including breast, colorectal, esophageal, laryngeal, liver, mouth, pharyngeal, stomach and pancreatic cancers.

Bill S-254 aligns with the recent call for warning labels that formed part of the Canadian Centre on Substance Use and Addictions' recently released *Canada's Guidance on Alcohol and Health: Final Report*<sup>3</sup>:

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 in the field and is supported by alcohol labelling recommendations<sup>4</sup> written by the Canadian Alcohol Policy Evaluation (CAPE) Project researchers, who have been leaders in the alcohol policy field for over 10 years.

In Canada, Yukon and Northwest Territories have required a health warning label on alcohol containers since 1991.<sup>5</sup> In 2017, the Yukon Liquor Corporation implemented a requirement for additional health warnings on alcohol containers, including a warning on alcohol and cancer risk, only to rescind the requirement following industry pressure.<sup>6,7</sup> Internationally, Australia and New Zealand recently mandated

<sup>1</sup> <https://www.parl.ca/DocumentViewer/en/44-1/bill/S-254/first-reading>

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

<sup>3</sup> CCSA: [https://ccsa.ca/sites/default/files/2023-01/Canada%27s%20Guidance%20on%20Alcohol%20and%20Health%20Final%20Report\\_I.pdf](https://ccsa.ca/sites/default/files/2023-01/Canada%27s%20Guidance%20on%20Alcohol%20and%20Health%20Final%20Report_I.pdf)

<sup>4</sup> 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>

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> The Yukon Liquor Corporation, a government agency, as part of an 8-month study, intended to apply 3 additional rotated health warnings on alcohol containers sold in Whitehorse outlets. This practice ended after one month following the industry pressure. The practice would ultimately resume for an additional 3 months, but the cancer warning was dropped.



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a pregnancy warning, the Irish government has passed regulations requiring a cancer warning label and a recent study in Yukon demonstrated the impact of warning labels.<sup>8,9,10</sup>

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 support S-254, we implore the Government of Canada to advance regulations at once, fulfilling the intent of this proposed legislation. Tobacco and cannabis products, two other legally regulated psychoactive substances, are already subject to mandatory warning labels and governed by federal Acts.<sup>11,12</sup> It is time to call on the Government of Canada, without interference from the alcohol industry, do the same with alcohol, a drug that costs Canada \$16.6 billion and was responsible for more than 18,000 deaths in 2017<sup>13</sup> as well as 3,300 new cancer cases in 2015.<sup>14</sup>

**The Senate plays a key role in introducing legislation to serve the best interest of Canadians. Will you call on the federal government of Canada to move forward regulations immediately, fulfilling the intent of Bill S-254? Will you also call on the government to endorse Canada's Guidance on Alcohol and Health? Please respond with answers to these key questions.**

We appreciate your care for the health of Canadians.

Sincerely,

Kelly Masotti  
Vice President, Advocacy  
Canadian Cancer Society

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<sup>8</sup> Food Standards Australia New Zealand. (2022). Labelling of alcoholic beverages: <https://www.foodstandards.gov.au/consumer/labelling/Pages/Labelling-of-alcoholic-beverages.aspx>

<sup>9</sup> Houses of the Oireachtas. Public Health (Alcohol) Act 2018: <https://www.oireachtas.ie/en/bills/bill/2015/120/>

<sup>10</sup> J Zhao, T Stockwell, K Vallance and E Hobin. (2020). The Effects of Alcohol Warning Labels on Population Alcohol Consumption: An Interrupted Time Series Analysis of Alcohol Sales in Yukon, Canada. *Journal of Studies on Alcohol and Drugs* 81(2), 225–237.

<sup>11</sup> <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2000-272/page-1.html#h-662300>

<sup>12</sup> <https://www.canada.ca/en/health-canada/services/cannabis-regulations-licensed-producers/packaging-labelling-guide-cannabis-products/guide.html#a72>

<sup>13</sup> 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.

<sup>14</sup> 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.