



**Alcoholic Beverage Warning Labels
Ontario Public Health Association
Submission Re: Bill C-206**

The Ontario Public Health Association (OPHA) is a province-wide organization whose mission is to provide leadership on issues affecting the public's health and to strengthen the impact of some 3,000 people active in community and public health throughout Ontario.

We are writing in support of *Bill C-206, an Act to amend the Food and Drugs Act (warning labels regarding the consumption of alcohol)* currently before the House of Commons Standing Committee on Health. We applaud MP Paul Szabo for putting alcohol labelling on the agenda and we congratulate members of Parliament from all parties for supporting Bill C-206 through first and second reading.

OPHA members have been in support of alcohol warning labels since 1996. The Ontario Public Health Association believes that:

1. Existing legislation does not adequately recognize alcohol as a drug, or indeed, as a product that is clearly associated with significant risk to public health and safety.

Alcohol is an integral part of our society. While nearly three quarters of Canadians drink, no one is immune to the consequences. Alcohol plays a role in thousands of premature deaths and preventable injuries each year. It is associated with increased risk of cirrhosis of the liver, cancer, cardiovascular disease, respiratory diseases, homicides, suicides, motor vehicle, boat and snowmobile crashes, falls, fires and drownings. Moreover, higher rates of consumption are associated with an increase in the risk of mental illness, an increase in crime, and reduced worker productivity. These translate into a human loss of devastating proportions, and an economic toll of billions of dollars. The estimated cost to Ontario of alcohol abuse is approximately \$4.6 billion per year in health care, law enforcement and lost labour productivity according to the Ontario Ministry of Health and Long Term Care in 2002.

Historically, Canada has used a variety of policy and other measures to control the supply and demand for alcohol, reduce the harm associated with drinking and promote public health and safety. We have made strides in reducing drinking and driving, promoting responsible alcohol sales and service and raising public awareness with respect to the effects of alcohol on the developing fetus.

However, alcohol is still too readily available to our young people—and it comes with devastating consequences. It is still too common on our roads and waterways and in our workplaces. And it is still far too frequent a factor in dysfunctional relationships, interpersonal disputes and violent crime.

Beverage alcohol, or more accurately, ethanol or ethyl alcohol, is classified as a sedative/hypnotic drug. Its impact on individuals, families and communities is well-documented. In an era of high unemployment, reduced social spending and widening disparity between the rich and the poor, it is extremely important that we not lose sight of the state's important role in promoting and protecting public health and safety. Where alcohol is concerned, the Government of Canada must:

- continue to take a comprehensive approach to the reduction of alcohol-related problems, through taxation and other policy measures, stronger controls on alcohol advertising and more effective enforcement of *Criminal Code* provisions, particularly with respect to drinking and driving and liquor smuggling;
- continue to provide adequate support to Canada's national addictions agency, the Canadian Centre on Substance Abuse, which is a lead agency in Canada's new Drug Strategy.
- continue to support effective, community-based health promotion, prevention, early identification and treatment programs;
- continue to ensure that Canadians have equitable access to housing, employment, a clean and safe environment, and needed health and social services - the backdrop that contributes to the drinking environment in a community.

2. The alcohol industry has a moral duty and a social responsibility to warn the public of the potential harm associated with its products.

The alcohol industry would like us to believe that its responsibility is discharged when it sponsors a public service announcement on the dangers of drinking and driving, develops a brochure or kit to help parents talk to their children about responsible consumption, or launches a multi-media social responsibility campaign. Clearly, there is a risk associated with every drink consumed and, whether or not it is heeded, this risk should be clearly and consistently spelled out on every alcohol label, package, container, advertisement and promotion. To argue over whether or not the information has an immediate impact on individual behaviour is pointless. Obviously, personal circumstances, cultural norms, age distribution of the population, and measures which influence alcohol availability (e.g., prices and taxes, number and density of retail and licensed outlets, hours and days of sales and service, minimum drinking age, controls on advertising and promotion) have a substantially larger impact on the levels, patterns and consequences of alcohol consumption, than do warning labels, as clearly indicated in recent WHO research

Nevertheless, the presence of simple, readable and targeted health messages on alcohol products, does one important thing: it acknowledges and reinforces the idea that alcohol is not just another consumer commodity; that it is, in fact, a product that, when misused, has negative consequences not only for the consumer but also for his or her friends, family, co-workers and community. To paraphrase Professor Robert Solomon from the Faculty of Law at the University of Western Ontario: "Milk-related car accidents, studies on tea-related hospital costs and police reports of orange-juice-crazed youths running amuck outside fruit stands are few and far between. It is time we treat alcohol like the drug that it is." It is time we label it accordingly.

3. Consumers have a right to know what constitutes "responsible consumption", the potential consequences of misuse and where to go for assistance.

There has been much discussion of late about what constitutes "responsible consumption" and what constitutes "alcohol abuse." Many would have us believe that alcohol only has a negative effect on the small percentage of the population that becomes addicted. Others have been very quick to popularize recent studies that highlight the potential health benefits of alcohol on coronary heart disease. Because alcohol consumption is associated with substantial risks to individual and public health and safety, it is misleading to encourage Canadians to drink more or to focus exclusively on the positive outcomes.

It is crucial that, whenever possible, we send clear messages to the public, and in particular, to drinkers, about what constitutes responsible or moderate, or alternatively, "irresponsible" or "abusive" consumption. One way to do so is by promoting the Low-Risk Drinking Guidelines which have been developed by the Centre for Addiction and Mental Health, the Ontario Public Health Association and the Association of Local Public Health Agencies, based on rigorous reviews of international scientific literature.

In addition, it is also important that we debunk some of the myths associated with alcohol consumption. Many do not know that alcohol is poisonous and, in high doses, can be lethal. Small amounts of alcohol can impair judgement, motor ability and reflexes. Many are unaware that alcohol, when combined with innocuous over-the-counter medications, can result in significant health problems. Alcohol is a depressant which can result in increased anxiety levels, severe mood swings, and clinical depression among users. Many do not know that young people, because they are developing physically and psychologically, are at greater risk of alcohol-related problems when they drink. In addition, the majority of Ontarians have experienced a problem due to another person's consumption, resulting in costs estimated at \$2.9 billion in Ontario and \$8.7 billion throughout Canada. Furthermore, the general public is not aware that a standard drink of beer, wine or liquor has the same amount of alcohol and can result in the same level of impairment. And many do not know where to turn for help if they suspect they or someone they love has a problem with alcohol.

Warning labels and consumer health information can play a role in educating the public about these issues. Well-researched, simply worded messages on alcohol containers and in alcohol advertisements and promotions, are a cost-effective way to raise awareness among a very large group of Canadians at risk of developing or already experiencing problems. Standard drink labels, when used in conjunction with health promotion measures, can help consumers gauge the amount consumed and its potential effects.

Simply put: if we are serious about reducing the incidence of injuries, disease and deaths associated with alcohol use among the general population, we should not neglect crucial parts of the equation: the consumer and the industry. Consumers have a right to be informed of the risks associated with the products they purchase. The industry has a responsibility to give consumers clear and unbiased information regarding the risks associated with the consumption of its products. Advertising and promotion only tell one side of the story. Labelling and consumer health information tell the other.

Summary

On behalf of the millions of Canadians and thousands of communities affected by alcohol, the Ontario Public Health Association urges the Government of Canada, and in particular, the members of the House of Commons Standing Committee on Health, to take advantage of this opportunity to promote public health and safety.

We endorse the suggestions put forward by the Centre for Addiction and Mental Health. We further recommend that legislation be passed requiring all alcohol containers and packaging to carry an industry-funded 1-800 consumer health information number, perhaps preceded by a simple message such as "The alcohol in this product can affect your health and safety. For more information, call..." This nation-wide, bilingual, 24-hour information and referral service would provide timely and unbiased information on the health benefits and risks associated with alcohol. The legislation should also ensure that the service is not used as a marketing vehicle for specific brands or companies.

In summary, we know that alcohol products have a significant impact on the health and safety of Canadians. We believe that the industry has the responsibility to inform, and consumers the right to be informed of the risks associated with alcohol consumption. We know that the most effective approach to prevention of alcohol-related problems is a comprehensive set of strategies that include policies, social marketing, skill-building and education measures. Let us take advantage of this opportunity to protect and promote public health and safety. Warning labels, which include standard drink information, and health information targeted at the individual consumer complement existing population-based control policies. They also send a message: that alcohol is a not just another consumer commodity and that its consumption entails specific risks.

Respectfully submitted,



Dr. Garry Aslanyan
President

cc. Canadian Centre on Substance Abuse
cc. Centre for Addiction and Mental Health
