



The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

**Ontario Public Health Association**  
l'Association pour la santé publique de l'Ontario  
Established/Établi 1949

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- Constituent Societies**
- Alliance for Healthier Communities (AHC)
  - Association of Public Health Epidemiologists in Ontario (APHEO)
  - Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)
  - Canadian Institute of Public Health Inspectors - Ontario Branch (CIPHI-O)
  - Community Health Nurses' Initiatives Group (RNAO)
  - Health Promotion Ontario (HPO)
  - Ontario Association of Public Health Dentistry (OAPHD)
  - Ontario Association of Public Health Nursing Leaders (OAPHNL)
  - Ontario Dietitians in Public Health (ODPH)
  - Ontario Public Health Libraries Association (OPHLA)

**Charitable Registration**  
Number 11924 8771 RR0001

March 20, 2023

Senator Patrick Brazeau  
The Senate of Canada  
Ottawa, Ontario  
Canada  
K1A 0A4

Sent by email to: [Patrick.Brazeau@sen.parl.gc.ca](mailto:Patrick.Brazeau@sen.parl.gc.ca)

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

The Ontario Public Health Association (OPHA) is writing to express support for S-254, An Act to amend the Food and Drugs Act (warning label on alcoholic beverages) that mandates labelling showing standard drink information, health advice and the link between alcohol and cancer on beverages that contain 1.1% or more of alcohol by volume. OPHA's recent letter to Ministers Duclos and Bennett dated September 22, 2022 outlined our support for mandatory labelling of all alcoholic beverages and presented evidence-informed recommendations for labelling alcohol products.

**Policy measures in Ontario**

In Ontario, alcohol warning labels can be one tool to help decrease population-level drinking. In our province, policy measures that control alcohol products are going in the wrong direction. Alcohol availability in the province increased by 22% between 2007 and 2017. Changes to rules that made it easier to buy alcohol during the COVID-19 pandemic have become permanent, including allowing licensed restaurants and bars to sell alcohol with takeout and delivery food and allowing alcohol to be delivered in food boxes and meal kits, among others. During the pandemic, there was a measurable uptick in substance use (e.g., alcohol and opioids), mental health issues, and factors that contribute to chronic diseases.<sup>i</sup>

**Anticipated benefits of alcohol warning labels**

Effective, federal policy and regulation of alcohol are welcome to reduce mortality, morbidity and pressure on our hospitals and healthcare system. Labelling can be an important intervention in a more comprehensive alcohol strategy that includes controlling pricing, availability and marketing.

Warning or not warning people about alcohol harms should not be in the hands of an industry, who are motivated to increase sales and profits. Under product liability law, alcohol manufacturers and distributors have a duty to warn consumers of risks - a duty they are not meeting. Alcohol warning labels would hold alcohol companies to the same standard as other regulated drugs. Tobacco and cannabis already have existing labelling requirements under the Tobacco and Vaping Products and Cannabis Acts. In the same way that plain packaging and health warnings on tobacco products were used as part of a broader public health approach to reducing consumption, appropriate and proportionate health messages on alcohol should be viewed as a cost-effective, easy-to-implement strategy that could raise awareness of alcohol-related harms.<sup>ii</sup>

Finally, alcohol labels would provide consumers with easy-to-use information on alcohol containers to accurately track and monitor their alcohol use in terms of standard drinks. This information is essential if individuals are to effectively reduce their alcohol consumption as recommended in [Canada's new Guidance on Alcohol and Health](#). Without understanding standard drinks and knowing the reasons why they should modify their consumption, people are unlikely to follow the guidance.

OPHA supports bill S-254. Canadians should be supported in making healthy and safe choices. We can improve health and well-being outcomes for Canadians now and for future generations.

Thank you for your courageous leadership and sharing your lived experience to make positive change, improving the lives of all Canadians.

Sincerely



John Atkinson  
Executive Director

cc. Senator Donald Plett, Senator Raymonde Saint-Germain, Senator Scott Tannas, Senator Jane Cordy, Senator Marc Gold

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<sup>i</sup> Association of Local Public Health Agencies. [Public Health Matters](#) (Spring 2022)

<sup>ii</sup> The Conversation (Canada). [Why alcohol health warning labels are a good idea: findings from the latest Global Drug Survey](#)

#### **More about the Ontario Public Health Association**

OPHA has established a strong record of success as the voice of public health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

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