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Re: Health information labelling of alcohol products

Dear Taoiseach

As health, social and community organisations and advocates, we are coming together to voice our serious concerns about suggestions from some sectors of Government to delay the introduction of Ireland's world-leading regulations of alcohol products with health information. This follows calls from the business lobbying group, IBEC, in relation to concerns about trading tariffs.

These regulations are a part of the Public Health (Alcohol) Act 2018 (PHAA). The important, evidence-based measures contained within the Act were debated for many years, were hard fought and won in the face of significant industry opposition. A key element in the campaign was the highly credible evidence put forward by clinicians and advocates, many with direct experience of the harms from alcohol. **Warning labels on alcohol products are a health issue, and the risks and harms they outline are proven, evidence-based and reflect widespread harms and deaths in Ireland.**

The final vote in the Dáil was overwhelmingly in favour of the legislation. The regulations were then subject to an EU notification process with the EU Commission finding that the regulations were proportionate to the scale of the health issues in Ireland. The World Trade Organisation has also been notified as required and the measures are due to come into effect in May 2026.

What is on the label?

These regulations will ensure that no alcohol product can be sold without bearing a warning that informs the public that:

- (i) "Drinking alcohol causes liver disease"

(ii) displays a health symbol intended to inform the public of the danger of alcohol consumption when pregnant, and

(iii) “There is a direct link between alcohol and fatal cancers”

In addition, the regulations make it mandatory that the alcohol and calorie content within the product is stated, and that the public health alcohol information website ‘askaboutalcohol.ie’ is displayed. Similar notices will also have to be placed in licensed premises.

International interest

This significant measure is being closely watched by public health bodies internationally. There has been much comment in the media and it has featured in many case studies on alcohol.¹ Like Ireland’s action on the ban on smoking in public places, it will likely lead to other countries taking a similar approach, particularly in relation to alcohol and cancer warnings. Ireland can take pride in its leadership in this regard. However, **any action now to delay implementation will have serious implications for public health, Ireland’s international standing and also for the democratic process.**

Reasons for alcohol labelling

It is important to remember the reasons why these regulations were developed. Ireland has a serious problem with alcohol consumption. While consumption per capita has reduced in recent years, partly as a result of the measures in the PHAA, the level is significantly above the EU average, which itself is one of the highest in the world.² It’s not just the amount of alcohol that is consumed but also the pattern of drinking. Studies indicate that more than one-half of those who drink are classified as hazardous drinkers.³ Ireland has the eighth highest level of binge drinking across OECD countries⁴ and concerningly this level has risen in 2024.⁵

The outworking of such consumption is a significant burden on individuals, families, the health service and the wider state. Just some of the issues include:

- Ireland has the third highest rate of Foetal Alcohol Spectrum Disorder in the world – with up to 7.4 % of the population having FASD⁶
- One third of children live with a parent who regularly drinks heavily or is dependent on alcohol⁷
- 1000 cancers caused by alcohol are diagnosed every year⁸
- Liver disease rates have increased by 80% in the past two decades⁹
- 1500 hospitals beds are in use daily because of alcohol^{10 11}
- Alcohol accounts for 30% of Emergency Department presentations¹²
- 4 people die every day because of alcohol¹³
- Alcohol is a factor in around half of all suicides¹⁴
- Alcohol is a significant factor in domestic and sexual violence¹⁵
- Between 30%- 65% of assaults, disorderly conduct, public order, and other social code incidents are associated with alcohol-use.¹⁶
- 37% of road fatalities have a positive toxicology for alcohol¹⁷
- Alcohol accounts for 11% of the health care budget¹⁸

- Alcohol costs the State 2.5% of GDP - €12 billion annually in wider costs including significant loss in workplace productivity¹⁹

WHO Best buys on alcohol policy

To address these concerns, the PHAA was developed. It is designed to work as a package using the World Health Organisation's 'best buys' on alcohol policy – with modest controls on price, marketing and availability. One element is the labelling of alcohol products with clear unbiased health information giving consumers the facts which are needed to help make more informed decisions. In addition, another measure in the Act provides for controls on the content of alcohol advertisements which when implemented will have to include the same information as on the labels. It is deeply concerning that seven years after its passage the Act is still not fully implemented which diminishes the overall package. Hence the importance of ensuring that the labelling measure is not delayed any further.

EU and public support

At EU level, Ireland's regulations have been accepted as a proportionate response to the issues in Ireland and have been defended by the Commission at discussions within the World Trade Organization. There is also ongoing strong public support of over 70% for labelling.²⁰

Industry disinformation

It is important to note that this latest call from IBEC is part of a long-running global industry campaign against Ireland's labelling regulations which has included denials of the impact of alcohol on health – e.g. suggestions that alcohol is good for the heart²¹ and that 'moderate' alcohol use does not cause cancer. Both of these claims are demonstrably untrue with strong evidence of alcohol's impact on health being published by multiple bodies.^{22 23} Even 1-2 drinks per day carries increased cancer risks and in Ireland about 1000 cancers caused by alcohol are diagnosed every year.²⁴

Despite this evidence IBEC's alcohol lobbying arm, Drinks Ireland has said warning language forthcoming on alcohol products in Ireland in relation to the links between cancer and liver disease was "disproportionate and inaccurate," and primarily geared toward scaring people.²⁵ Such claims by industry indicate that their real fear is that the public will be properly informed about cancer risks. They are also reflective of the action of the tobacco industry in relation to health warning labelling measures.

Labelling – not an issue for exports and not a Tariff issue

Another industry tactic is to claim that the regulations will place a burden on exporters. However, these measures only apply to goods sold in Ireland and so have no impact on Ireland's exports. In relation to imports or home-produced products, the legal onus is on retailers of alcohol to ensure products are appropriately labelled. For example, if a product does not have the required label, the retailers can simply add a stick-on label to the product.

Not surprisingly, however, the industry is continuing its fight against labelling by using current concerns around global trading tariffs to call for the labelling regulations to be suspended²⁶ even though this issue does not have a bearing on exports.

Cost of alcohol to business and the wider State

In addition to the significant health reasons for these labels, there is also the issue of the impact of alcohol on the state. Alcohol costs the health service at least 11% of its budget.²⁷ The wider cost to the state has been estimated by the World Health Organisation as at least **2.5% of GDP - €12 billion** annually.²⁸ Of particular note is that around 60% of these costs are related to productivity losses, due to workplace absence and presenteeism or premature mortality. Against this, alcohol excise duties only raise a tenth of the state costs, just €1.2 billion annually.²⁹ Such economic impacts must be an important part of any discussion on alcohol.

We urge you to ensure that the impact of alcohol on individuals, families and the State are placed ahead of the highly suspect claims of an immensely profitable, global industry which leaves the State to pick up the tab for the harm its products cause.

Yours sincerely

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