



Association of Local
PUBLIC HEALTH
Agencies

alPHa's members are
the public health units
in Ontario.

alPHa Sections:

Boards of Health
Section

Council of Ontario
Medical Officers of
Health (COMOH)

Affiliate

Organizations:

Association of Ontario
Public Health Business
Administrators

Association of
Public Health
Epidemiologists
in Ontario

Association of
Supervisors of Public
Health Inspectors of
Ontario

Health Promotion
Ontario

Ontario Association of
Public Health Dentistry

Ontario Association of
Public Health Nursing
Leaders

Ontario Dietitians in
Public Health

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April 17th, 2023

Hon. Jean-Yves Duclos, P.C., M.P.
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister Duclos,

Re: Bill S-254, an Act to amend the Food and Drugs Act (warning label on alcoholic beverages)

On behalf of the Association of Local Public Health Agencies (alPHa) and its Council of Ontario Medical Officers of Health, Boards of Health Section and Affiliate Organizations, we are writing to express support for the Senate Bill S-254 An Act to amend the Food and Drugs Act (warning label on alcoholic beverages), which calls on the federal government of Canada to implement alcohol warning labels.

According to a 2020 report on Canadian Substance Use Costs and Harms, alcohol cost Canada \$16.6 billion and was responsible for more than 18 000 deaths in 2017. Public Health Ontario estimates an average of 4,330 alcohol attributable deaths occur in Ontario annually. Alcohol is also classified by the World Health Organization (WHO) as a Class 1 carcinogen and is a cause of 7 different types of cancer, including those of the breast and colon.

Bill S-254 aligns with the updated Canadian Guidance on Alcohol and Health, which recommends that Health Canada “require, through regulation, the mandatory labelling of all alcohol beverages to list the number of standard drinks in a container, the Guidance on Alcohol and Health, health warnings and nutrition information.” This recommendation was based on the Canadian Centre on Substance Use and Addiction (CCSA)’s systematic review of enhanced alcohol container labels. Further, this policy is supported by Evidence-Based Recommendations for Labelling Alcohol Products in Canada developed by the Canadian Alcohol Policy Evaluation (CAPE) project. The WHO also recommends health warning labels on alcohol to enable individuals to make better-informed choices about their health.

A recent study in Yukon has contributed to the growing evidence demonstrating that warning labels decreases alcohol sales. Other jurisdictions are now moving to implement similar policies, including Australia and New Zealand mandating a warning label related to the risks of alcohol during pregnancy, and Ireland requiring warning labels on the risks of alcohol in causing cancer.

Tobacco and cannabis are also regulated psychoactive substances that have significant health impacts, and both are already subject to mandatory warning labels. Extensive evidence demonstrates that warning labels on tobacco products decreases product appeal and increases consumers’ intention to quit. Similarly, early evidence since the legalization of cannabis indicates that consumers are more aware of health risks when warning labels are present. It is time that alcohol packaging also be required to have health warning labels.

In summary, we believe that the measures proposed in Bill S-254, if approved by the Parliament of Canada and enacted by the Government of Canada, would be an important public health measure that will protect the health and wellbeing of all Canadians.

We look forward to working with you and would like to request an opportunity to meet with you and your staff. To schedule a meeting, please have your staff contact Loretta Ryan, Executive Director, alPHA, at loretta@alphaweb.org or 647-325-9594.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trudy Sachowski". The signature is fluid and cursive, with the first letter of the first name being a large, stylized 'T'.

Trudy Sachowski,
President

Copy: Senator Patrick Brazeau (Bill Sponsor)
Hon Carolyn Bennett, Minister of Mental Health and Addictions; Associate Minister of Health
Dr. Theresa Tam, Chief Public Health Officer of Canada
Dr. Kieran Moore, Chief Medical Officer of Health, Ontario

The Association of Local Public Health Agencies (alPHA) is a not-for-profit organization that provides leadership to Ontario's boards of health. alPHA represents all of Ontario's 34 boards of health, medical officers and associate medical officers of health, and senior public health managers in each of the public health disciplines – nursing, inspections, nutrition, dentistry, health promotion, epidemiology, and business administration. As public health leaders, alPHA advises and lends expertise to members on the governance, administration, and management of health units. The Association also collaborates with governments and other health organizations, advocating for a strong, effective, and efficient public health system in the province. Through policy analysis, discussion, collaboration, and advocacy, alPHA's members and staff act to promote public health policies that form a strong foundation for the improvement of health promotion and protection, disease prevention and surveillance services in all of Ontario's communities.