



Association of European Cancer Leagues'

contribution to

**Notification of Draft Regulations Under
Section 12 of the Public Health
(Alcohol) Act 2018 TRIS Notification
Number: 2022/441/IRL**

About the Association of European Cancer Leagues (ECL)

The Association of European Cancer Leagues (ECL) is a non-profit organisation that unites, supports and represents cancer leagues across the WHO European region.

Established in 1980 by prominent NGOs and experts, and based in Brussels (Belgium), ECL provides a voice and forum for cancer leagues to collaborate and share knowledge, primarily in the areas of cancer prevention, tobacco control, access to medicines and patient support, and create opportunities to advocate for these issues at the EU level and beyond.

From Iceland to Cyprus, cancer leagues contribute to preventing and fighting cancer by, amongst other things, raising awareness and educating people about cancer, investing in research and providing support to cancer patients and their families during and after treatment. Our member leagues together employ more than 8,000 people and over 300,000 volunteers. They spend more than €750 million every year to fight cancer and represent over 570 million citizens.

ECL's contribution

Alcohol use, human health and cancer

In line with the recommendations of the European Code against Cancer,¹ ECL is committed to addressing modifiable risk factors for cancer, including alcohol consumption. Therefore, we fully support the Irish government in implementing the Public Health (Alcohol) Act 2018 and, in particular, in its endeavor to improve consumers' knowledge of the nutritional profile of alcohol products and the health risks associated with alcohol consumption.

The adverse health effects caused by the consumption of alcohol beverages have been widely documented,² with long-standing and yet growing evidence linking alcohol and cancer in particular.³ The International Agency for Research on Cancer (IARC) Monographs concluded that "alcohol consumption is carcinogenic to humans (Group 1); ethanol in alcoholic beverages is carcinogenic to humans (Group 1); acetaldehyde associated with the consumption of alcoholic beverages is carcinogenic to humans (Group 1),"⁴ the highest level of risk.

Research has shown that alcohol use increases the risk of developing several types of cancer - including breast,⁵ colorectum,⁶ prostate⁷, liver and head and neck cancers,⁸ with evidence

¹ <https://cancer-code-europe.iarc.fr/index.php/en/>

² Rehm, J. et al. (2017). The relationship between different dimensions of alcohol use and the burden of disease-an update. *Addiction* (Abingdon, England), 112(6), 968–1001; Birková, A., et al. (2021). Current View on the Mechanisms of Alcohol-Mediated Toxicity. *Int J Mol Sci.* 7;22(18):9686.

³ Pelucchi C, et al. (2011). Alcohol consumption and cancer risk. *Nutr Cancer*;63(7):983-90.

⁴ IARC Working Group on the Evaluation of Carcinogenic Risks to Human, Personal Habits and Indoor Combustions. Volume 100 E. A Review of Human Carcinogens, International Agency for Research on Cancer, 2012

⁵ Seitz HK et al. (2012). Epidemiology and pathophysiology of alcohol and breast cancer: Update 2012. *Alcohol Alcohol.* 47(3):204-12.

⁶ Na HK et al. (2017). Molecular Basis of Alcohol-Related Gastric and Colon Cancer. *Int J Mol Sci.* 18(6):1116.

⁷ Macke, A. J. et al. (2022). Alcohol and Prostate Cancer: Time to Draw Conclusions. *Biomolecules*, 12(3), 375.

⁸ Rumgay, H. et al. (2021). Alcohol and Cancer: Epidemiology and Biological Mechanisms. *Nutrients*, 13(9), 3173.

suggesting that alcohol consumption can increase the aggressiveness of several types of cancer.⁹

While heavy drinking remains the biggest contributor to the global burden of alcohol-attributable cancers, light-to-moderate drinking also plays a significant role.¹⁰ As emerging evidence contradicts the existence of a threshold for a 'safe' level of alcohol consumption,¹¹ the European Code Against Cancer recommends not just to restrict but to ideally avoid alcohol consumption as a way to reduce the risk of developing cancer.¹²

Public health measures to increase health literacy and reduce alcohol-related harm

Worryingly, public awareness of the health risks associated with alcohol use remains low, and the WHO European Region stands as the largest consumer of alcoholic beverages in the world - with highest per capita consumption and proportion of drinking population.¹³ This reality has a great impact on cancer figures in the Region, with 4.2% of the total number of cancers attributable to alcohol drinking in 2020.¹⁴

Introducing mandatory on-product health warnings and nutritional labeling, together with strengthened rules on alcohol content and a wider dissemination of accurate information on alcohol consumption to the public, could greatly empower the Irish population to make healthy choices. Currently, this approach is recommended as a priority action in the European framework for action on alcohol, 2022-2025, recently published by WHO Regional Office for Europe.¹⁵

Recent studies conducted in Europe have shown that citizens are generally in favor of front-of-pack nutritional labeling, that this kind of labeling can influence consumers' behavior and improve the overall healthiness of their choices.¹⁶ Similarly, health warnings have an

⁹ See, among others: Rodriguez, F. D. et al. (2021). Biochemical Mechanisms Associating Alcohol Use Disorders with Cancers. *Cancers*, 13(14), 3548; Marié, C., et al. (2022). Mechanisms of chronic alcohol exposure-induced aggressiveness in cellular model of HCC and recovery after alcohol withdrawal. *Cellular and molecular life sciences : CMLS*, 79(7), 366.

¹⁰ Rungay, H. et al. (2021). Global burden of cancer in 2020 attributable to alcohol consumption: a population-based study. *The Lancet Oncology*, 22(8), 1071-1080.

¹¹ Burton, R., & Sheron, N. (2018). No level of alcohol consumption improves health. *Lancet* (London, England), 392(10152), 987-988. [https://doi.org/10.1016/S0140-6736\(18\)31571-X](https://doi.org/10.1016/S0140-6736(18)31571-X)

¹² Scoccianti C, Cecchini M, Anderson AS, Berrino F, Boutron-Ruault MC, Espina C, et al. European Code against Cancer 4th Edition: Alcohol drinking and cancer. *Cancer Epidemiology* [Internet]. 2015 [cited 2022 Sep 22];39:S67-74. Available from:

<http://dx.doi.org/10.1016/j.canep.2015.01.007><http://dx.doi.org/10.1016/j.canep.2016.09.002><http://dx.doi.org/10.1016/j.canep.2016.09.0111877-7821/a>

¹³

https://cdn.who.int/media/docs/librariesprovider2/regional-committee-meeting-reports/rc72/european-framework-for-action-on-alcohol-2022-2025-cheat-sheet-en.pdf?sfvrsn=8e63aef4_2&download=true

¹⁴ IARC, 2021. <https://gco.iarc.fr/causes/alcohol/home>

¹⁵ WHO, 2022.

<https://www.who.int/europe/publications/m/item/european-framework-for-action--on-alcohol--2022-2025>

¹⁶ Nohlen, H., et al. (2022)., Front-of-pack nutrition labelling schemes: an update of the evidence, EUR 31153 EN, Publications Office of the European Union, ISBN 978-92-76-55032-7, doi:10.2760/932354, JRC130125.

established track record as an effective public health strategy that increases consumers' health literacy and prompts behavioral changes, while complying with international trade laws.¹⁷

ECL fully supports the adoption of such strategies as a way to move forward with the fight against NCDs and cancer. Furthermore, the cost-effectiveness of these strategies should not be overlooked, especially considering the impact they could have on an economically burdensome condition such as cancer.¹⁸

Alcohol and products' labeling in the EU: state of play

Ireland's decision to implement mandatory labeling for alcohol products is justified on public health grounds and it aligns with proposed European policies on the topic.

As part of the policy push towards healthier diets, the revision of the Regulation (EC) No 1169/2011 on the provision of food information to consumers (FIC Regulation) is currently ongoing. In this context, a proposal from the European Commission for introducing mandatory labeling of alcoholic beverages with indication of the list of ingredients and the nutrition profile is expected by the end of 2022, and for health warnings by the end of 2023.

The Revision of the FIC regulation is linked to both the Farm-to-Fork Strategy and Europe's Beating Cancer Plan - with the latter supporting the proposal for mandatory labeling and health warnings as a way to reduce harmful alcohol consumption.¹⁹

Conclusions

As outlined in our recent advocacy,²⁰ ECL calls on the European Commission to support the implementation of the Irish Public Health Act 2018. We firmly believe that labelling should be adapted to inform citizens of the health and cancer risks linked with any level of alcohol consumption. ECL commends Ireland for its efforts to introduce front-of-pack nutritional labels and health warnings on alcohol products, and strongly supports their swift implementation.

¹⁷ WHO Europe, 2014. Evidence Brief - How large pictorial health warnings on the packaging of tobacco products affect knowledge and behaviour.

https://www.euro.who.int/_data/assets/pdf_file/0006/276558/How-large-pictorial-health-warnings,-Evidence-Brief-English.pdf

¹⁸ Hofmarcher, T., et al. (2020). The cost of cancer in Europe 2018. European journal of cancer (Oxford, England : 1990), 129, 41–49.

¹⁹ European Commission, 2022. https://health.ec.europa.eu/system/files/2022-02/eu_cancer-plan_en_0.pdf

²⁰ https://www.cancer.eu/wp-content/uploads/Joint-letter-to-MEPs_BECA-report-04.02.2022.pdf