

Health information and warnings on alcohol packaging in Ireland: It is time to progress the Public Health (Alcohol) Act 2018

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Findings from the 2019-2020 Irish National Drug and Alcohol Survey are a reminder of the burden of alcohol-related harms in Ireland, with two-fifths of drinkers engaging in heavy episodic drinking at least once per month (six or more standard drinks on a single occasion) and 14.8% of the general population meeting the criteria for an alcohol use disorder [1]. This harmful use of alcohol is associated with myriad individual and societal harms and creates a substantial burden on Ireland's economy [2].

The packaging of alcoholic drinks provides a low-cost opportunity to communicate important health information to consumers, including at the point of purchase and before and during consumption. The World Health Organization (WHO) recommend alcohol companies be legally required to display relevant information (e.g., harms, consumption guidelines, warnings, nutritional value, etc) on packaging and present it clearly and consistently across products [3]. Prominent on-pack warnings, which include images and provide clear information about use and harms, appear most likely to positively impact consumer behaviour [4-8].

Through the Public Health (Alcohol) Act 2018, Ireland already has a legal mechanism through which to enact the WHO's recommendations. Section 12 of the Act, as it will be referred to hereafter, will make it mandatory for the packaging of alcoholic drinks sold in Ireland to display: (i) a warning about the dangers of alcohol consumption (including when pregnant); (ii) a warning of the direct link between alcohol and fatal cancers; (iii) details of an independent website with public health information in relation to alcohol consumption; and (iv) nutritional information (e.g., grams of alcohol and energy content) [9]. The design and layout of this information will be specified by the state.

Several measures in the Act have already been implemented (e.g., structural separation of alcoholic drinks in retailers and a ban on some outdoor advertising) or will be soon (e.g., minimum pricing per gram of alcohol or a ban on sponsorship of certain events). As far as we are aware, however, there is no scheduled commencement date for section 12 (the provisions

on alcohol product labelling). The Food Safety Authority of Ireland (FSAI) held a consultation, which closed in late 2019, to help inform implementation of this labelling measure [10], but the responses and any resulting actions are not yet known.

Non-commencement of the provisions on mandatory labelling prolongs reliance on self-regulatory designs and presentation of this information to the public. There are some practical benefits to self-regulation, for example negating the time and resource burden associated with legislative action. Such approaches, however, have been criticised for omitting important health information, lacking clarity, and having limited effectiveness [5,7,11,12]. A study of 21 European countries found that Ireland was one of only two where alcohol consumption had not declined during the first stages of the COVID-19 pandemic [13]. That on-trade premises were closed or had restricted access for much of this time, while off-trade sales were permitted, suggests an increase in home consumption during this period. That the mandatory labelling provisions are not yet in force means an opportunity to maximise exposure to new warnings on take-home packaging has already been missed.

There are several reasons why Ireland's Government may wish to accelerate progress of section 12. First, since the Act was passed and the FSAI consultation closed, there has been positive evaluation concerning the real-world impact of warnings on the packaging of alcoholic drinks in a Canadian territory [e.g., 14-17] and further evidence of the potential public health impact in the United Kingdom (UK) [e.g., 5,6]. Second, research suggests that stronger labelling is supported by the public [18], including in Ireland [19], and that increased awareness of the health impacts of alcohol may increase public support for other alcohol control policies [20]. Third, the tobacco and wider warnings literature offers a template on how best to design warnings [21,22], and the efficacy of well-designed warnings on tobacco products [21, 23] provides insight into their potential impact for alcoholic drinks.

On-pack warnings that inform consumers of the potential harms associated with alcohol consumption are opposed by the alcohol industry [24] and will likely be legally challenged [25]. This may be viewed as a barrier, but litigation is the norm in the tobacco field, with tobacco companies seldom successful. Indeed, despite legal challenges to tobacco packaging policies in many continents, over 100 countries now have large pictorial warnings (that cover at least 50% of the main display areas on tobacco packs) and a growing number of countries require standardised packaging [26]; Ireland, as a global leader in tobacco control, requires both [27].

While the implementation and planned rollout of several components of the Act may help to better safeguard the public – although evaluation is needed to understand whether this is the case – consumers have a basic right to be properly informed about the possible harms of products available for purchase [3]. This is currently not the case for alcoholic drinks in Ireland. Strong political leadership was key to the passage of the Act [28] and will likely be needed to advance section 12 if this policy is to fulfil its intended purpose.

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