



The Finnish Association for Substance Abuse Prevention EHYT & The Network for Preventive Substance Abuse Work in Finland

Contribution to the TRIS notification 2022/441/IRL of Draft Regulations under Section 12 of the Public Health Alcohol Act, 2018.

The Finnish Association for Substance Abuse Prevention EHYT prevents and reduces the harmful effects of substance abuse, gambling, and gaming, and supports the well-being of communities and individuals in Finland.

The Network for Preventive Substance Abuse Work includes 59 Finnish social and health care organizations, which aim to prevent and decrease the harm caused by substance abuse. This multi-voiced group includes non-profit organizations, service providers and patient associations.

EHYT together with The Network for Preventive Substance Abuse Work supports the full implementation of the Public Health (Alcohol) Act 2018 in Ireland. We agree on the arguments of Alcohol Action Ireland's contribution on the Draft Regulations under the Public Health (Alcohol) Act 2018.

We want to emphasize that

- **Alcohol-related harm is a major public health concern.**

Alcohol-related harm is undisputedly a major public health concern. Alcohol has various negative effects on health and safety. Alcohol consumption is directly associated with various diseases, such as liver cirrhosis, fatal cancers, cardio vascular disease and mental health disorders. Pre-natal exposure to alcohol causes serious lifelong neuro-developmental conditions. As stated in Alcohol Action Ireland's contribution, a range of studies have shown evidence of significant levels of drinking in pregnancy in Ireland.

- **There is an evidence of the effectiveness of labelling and warnings**

Research from the tobacco field has shown a clear evidence of the effectiveness of labelling and health warnings.¹ Previous studies indicate that similar health warnings could affect consumer perceptions of alcohol products as well. Cancer warnings and warnings related to alcohol consumption during pregnancy give information about long-term health impacts and can encourage behavioural change.

- **Labelling is supported by the European Union and the World Health Organization**

As stated in European Alcohol Policy Alliance's contribution, labelling is mentioned and encouraged as one medium to reduce alcohol-related harm in various global and EU-level strategies, recommendations and action plans, including Europe's Beating Cancer Plan of 2021.

¹ Sambrook Research International, 2009. A review of the science base to support the development of health warnings for tobacco packages.

- **Consumers have the right to accurate health information**

EHYT and The Network for Preventive Substance Abuse Work want to emphasize the consumers' right to accurate health information; consumers have the right to know what they are drinking. As a result, they can make more informed decisions about the risk of alcohol use and the impact to their health and wellbeing.

Conclusion

Labels should be considered an important medium, among other measures, to provide information about the health impacts and prevent and reduce the alcohol-related harm. Consumers have the right to accurate health information to be able to make more informed decisions concerning their health. There is an evidence of the effectiveness of labelling and warnings. Labelling is supported and encouraged by the European Union and the World Health Organization.

We thereby support the full implementation of the Public Health (Alcohol) Act 2018 in Ireland.