

March 15, 2023

Honourable Jean-Yves Duclos
Minister of Health, Canada
House of Commons
Ottawa, ON K1A 0A6
jean-yves.duclos@parl.gc.ca

Dear Honourable Minister Duclos:

Re: Support for 'BILL S-254 An Act to amend the Food and Drugs Act (warning label on alcoholic beverages)'

On March 15, 2023, the Board of Health for the Simcoe Muskoka District Health Unit (SMDHU) received information on the 2023 [Canada's Guidance on Alcohol & Health](#) and passed a motion to endorse Bill S-254 – An Act to Amend the Food and Drug Act (Warning Label on Alcoholic Beverages), calling on the federal government of Canada to implement health warning labels on alcohol.

According to the Canadian Community Health Survey (CCHS) in 2019/20, 20% of adults in Simcoe Muskoka ages 19 years and older reported drinking at a high-risk level (7+ drinks) in the past week. This was significantly higher than the comparable provincial average of 15%. SMDHU's Board of Health is committed to our mandate under the Ontario Public Health Standards to influence the development and implementation of healthy policies and programs related to alcohol and other drugs to reduce harms associated with substance use.

As such, we ask for your support of Bill S-254 and the implementation of federally mandated labels on all alcohol containers sold in Canada, to better inform Canadians about the health risks of alcohol. This is especially important given that the majority of Canadians are unaware that alcohol is classified by the [World Health Organization \(WHO\) as a Class 1 carcinogen](#) and is a cause of 7 different types of cancer, including breast and colon.

Bill S-254 aligns with the recent call in Canada's Guidance on Alcohol and Health for mandatory labelling of all alcoholic beverages with the number of standard drinks in a container, risk levels from Canada's Guidance on Alcohol and Health, and health warnings. This recommendation by the Canadian Centre on Substance Use and Addiction is based on their [2022 systematic review of enhanced alcohol container labels](#), and is supported by other scientific experts in the field, including [Evidence-based Recommendations for Labelling Alcohol Products in Canada](#) developed by [Canadian Alcohol Policy Evaluation \(CAPE\) Project](#) researchers. A recent study in Yukon has contributed to the growing evidence base regarding the [impact of warning labels](#); briefly introduced labels on alcohol products in government-owned liquor stores saw sales of labelled alcohol products decrease by 6.6%, while sales of unlabeled alcohol products increased by 6.9%¹. The extensive evidence regarding warning labels applied to tobacco products is also informative, having been shown to lead to increased health knowledge and decreased tobacco use (WHO, 2022).

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In Canada, similar to [tobacco](#) and [cannabis](#) products, it is time for the Government of Canada to require warning labels on alcohol. According to a 2020 report on [Canadian Substance Use Costs and Harms](#), alcohol is a drug that cost Canada \$16.6 billion and was responsible for more than 18,000 deaths in 2017 alone.

The Senate plays a key role in introducing legislation to serve the best interests of Canadians and we urge you to join Senator Brazeau in supporting Bill S-254.

Sincerely,

ORIGINAL Signed By:

Ann-Marie Kungl, Board of Health Chair
Simcoe Muskoka District Health Unit

AMK:CG:LS:sh

cc:

Members of Parliament for Simcoe and Muskoka
Ontario Boards of Health
Dr. Kieran Moore, Chief Medical Officer of Ontario
Senator Patrick Brazeau
Loretta Ryan, Executive Director, Association of Local Public Health Agencies, alpha
Dr. Theresa Tam, Chief Public Health Officer of Canada

¹ Weerasinghe, A., Schoueri-Mychasiw, N., Vallance, K., Stockwell, T., Hammond, D., McGavock, J., Greenfield, T.K., Paradis, C., Hobins, E. Improving Knowledge that Alcohol Can Cause Cancer is Associated with Consumer Support for Alcohol Policies: Findings from a Real-World Alcohol Labelling Study. *Int. J. Environ. Res. Public Health* 2020, 17, 398. Retrieved from: <https://doi.org/10.3390/ijerph17020398>