



the national charity for alcohol-related issues

Introduction of Health Advice/Warnings on Alcohol Containers and Promotional Materials

Introduction

Alcohol Action Ireland is the national charity for alcohol-related issues. Our work involves providing information on alcohol-related issues, creating awareness of alcohol-related harms, and of policy responses which can reduce those harms. We welcome the opportunity to make a submission to the public consultation on proposals to legislate for the introduction of health advice/warnings on alcohol containers and promotional materials.

Alcohol Action Ireland recommends that all packaged alcohol and promotional materials be fully labeled with three key pieces of health information

- The number of alcohol units in the product
- A full list of ingredients
- Health warnings about the risks of drinking alcohol during pregnancy and the risks to health in general

Currently, Irish consumers are not provided with any of the above information. There exists low levels of awareness of the health risks associated with alcohol use, as well as widespread confusion among consumers as to how much they are drinking. All consumers have the right to make informed choices about their health. Providing information/health advice/warnings is a key step in increasing awareness of the health harms associated with alcohol use.

The Case for Health Information

For all consumers

Alcohol consumption is linked to more than 60 diseases and conditions, affecting nearly every organ in the human body. It is the cause of numerous diseases and a contributory factor in many more. For many conditions, the risk of harm is directly related to the amount of alcohol consumed. Alcohol is the third highest factor for premature death and ill-health in the European Union.ⁱ

Frequent and heavy drinking has become the norm with Ireland near the top of the European poll when it comes to the amount we drink in a year, and the amount we drink in a sessionⁱⁱ. Ireland has the third highest per adult consumption rate out of 26 EU countries. Furthermore, in a study of 15-year-olds from 33 European countries, more Irish girls (44%) than boys (42%) reported being drunk in the past monthⁱⁱⁱ. The same study described Irish 15-year-olds as having “a major issue about drunkenness”.

For pregnant women

It is in a child's best interests for a prospective mother not to drink alcohol while pregnant due to the risk of developmental brain disorders to the child. Yet two out of three women in Ireland continue to drink alcohol during their pregnancy. The advice from the country's Chief Medical Officer^{iv} is clear:

Given the harmful drinking patterns in Ireland and the propensity to binge drink, there is a substantial risk of neurological damage to the foetus resulting in Foetal Alcohol Spectrum Disorders (FASD). Therefore, it is in the child's best interest for a pregnant woman not to drink alcohol during pregnancy.

A study of women who attended the Coombe Women's Hospital^v found that almost two-thirds (63%) of the 43,318 women surveyed said they drank alcohol during their pregnancy. The situation is put into stark relief when the number of women who stopped drinking during pregnancy 13.2% is contrasted with the almost 50% who gave up smoking. What the numbers suggest is that women are making choices based on what they perceive as greater risk to their own health and that of their child's.

While women may receive information telling them that alcohol should be avoided during pregnancy that information is outweighed by the extent of alcohol marketing which adds to the cultural acceptability and normalising of problem levels of alcohol use. Alcohol is marketed and sold in supermarkets, petrol stations and convenience stores as if it were just another grocery so that it has become an everyday item in the family shopping basket. Anecdotal evidence suggests that women receive either little information or contradictory information on alcohol during pregnancy from a number of sources including health care providers.

What are the Fetal Alcohol Spectrum Disorders? And what are the risks?

Alcohol consumption can lead to disorders in how the brain develops in the womb as the placenta does not act as a barrier to alcohol. The foetus is especially vulnerable to brain injury at particular stages of its development. Damage can occur particularly in the first three months of pregnancy, and also from the seventh month of pregnancy on when the brain experiences a growth spurt. This damage can later show up in the form of behavioural, social, learning and attention difficulties in childhood, adolescence and throughout adulthood. As such, there can be lifelong consequences for an individual with any of the conditions among the FASD.

Fetal Alcohol Syndrome (FAS), is the rarest, but most easily recognised condition on the spectrum, and presents in the child of a mother who drank heavily during the first trimester of pregnancy. FAS affects a child's facial features and height, as well as their central nervous system.^{vi} Partial Fetal Alcohol Syndrome, (pFAS), Alcohol Related Neurodevelopmental Disorder (ARND), and Alcohol Related Birth Defects are far less easily diagnosed, but experts in the United States say that ARND is 10 times more prevalent than FAS. Due to difficulties in recognition and diagnosis of ARND, those affected are less likely to receive early diagnosis and appropriate treatment, often resulting in poor outcomes for those with the condition.

Drinking heavily during pregnancy can also increase the chances of complications during pregnancy and childbirth, as well as increasing the risk of miscarriage and stillbirth. A leaflet on women and alcohol published by the Health Promotion Unit^{vii} advises that there is no known safe level of alcohol use during pregnancy and that women should stop drinking during this time. It makes the following points:

- More than three drinks a day increases the risk of miscarriage
- More than 12 drinks in a week increases the risk of premature birth
- Sudden high levels of alcohol damages the developing brain

Summary

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- The number of alcohol units in the product
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ⁱ Hope A. (2008) Alcohol-related harm in Ireland. HSE – Alcohol Implementation Group

ⁱⁱ TNS Opinion and Social (2007) Attitudes Towards Alcohol. Special Eurobarometer 272b/Wave 66.2. Brussels: European Commission; Hope (2007) Alcohol Consumption in Ireland 1986-2006. Health Service Executive – Alcohol Implementation Group

ⁱⁱⁱ Hibell B, Andersson B, Bjarnason T, Ahlström S, Balakireva O, Kokkevi A, Morgan M (2007) *The ESPAD Report 2003. Alcohol and Other Drug Use Among Students in 35 European Countries*. The Swedish Council for Information on Alcohol and Other Drugs (CAN) and the Pompidou Group at the Council of Europe. Stockholm: Sweden

^{iv} www.dohc.ie

^v Barry S, Kearney A, Lawlor E, McNamee E and Barry J (2006) *The Coombe Women's Hospital study of alcohol, smoking and illicit drug use, 1988–2005*. Dublin: Coombe Women's Hospital

^{vi} Mongan D, Reynolds S, Fanagan S and Long J (2007) Health Related Consequences of Problem Alcohol Use. Overview 6. Dublin: Health Research Board

^{vii} Health Promotion Unit (2003) *Little Book of Women and Alcohol: Take a Closer Look at What Drink is Doing to You*