



June 20, 2023

Gina M. Raimondo,  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, DC 20230

Dear Sec. Raimondo,

Alcohol Justice is an alcohol research and policy workshop located in San Rafael, California. We advocate for evidence-based policies that protect the public health and safety. We are aware that there is some opposition from the industry to Ireland's recently enacted alcohol labeling policies, and that they may want the United States delegation to the World Trade Organization (WTO) to intervene. We urge the United States to protect Ireland's right to set these standards, and to consider adopting them domestically as well.

Alcohol remains one of the leading preventable causes of mortality worldwide, accounting for approximately 3 million deaths annually (Global Burden of Disease Collaborative, 2020). Aside from mortality from acute intoxication, poisoning, accidental injury, and criminal violence, alcohol use is also associated with a number of cancers (IARC, 2010), including breast cancers.

Knowledge about alcohol harms, however, remain low. In a review of alcohol-cancer risk awareness research, Scheideler and Klein note that while there is large nation-to-nation variance, the overall levels of awareness remain low. (2018) They further note that awareness rises dramatically on surveys where alcohol is listed as a possible option for cancer risk, but even so, respondents are liable to identify only liver cancer as having an alcohol exposure component (Calvert, Toomey & Jones-Webb, 2021). In Ireland itself, awareness of the alcohol-cancer risk sits around 42% (Ryan et al., 2015).

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Labelling can address both the harm and the knowledge gap. First and foremost, labelling complies with the World Health Organization (WHO)'s global strategy to reduce the harmful use of alcohol. The WHO clearly identifies health labelling as a recommended strategy to inform consumers, and labels this strategy a policy best buy (WHO, 2010). It has a self-reinforcing effect: as awareness of cancer risk rises, so does support for alcohol control policies such as labelling. (Bates et al., 2018)

Secondly, studies of enhanced alcohol labeling akin to those enacted by Ireland show it has a protective effect by reducing consumption. A study in the Yukon area of Canada introduced alcohol warning labels to products in the state-run stores, resulting in an overall 6.3% reduction in alcohol sales. After the trial was ceased, sales diminished *more*, showing a nearly 10% drop. (Zhao et al., 2021) As with the Bates study, populations in the exposure areas in the Yukon reported increased support for alcohol labelling after the intervention concluded. (Schoueri-Mychasiw et al., 2020)

We understand that the industry has concerns that labelling will affect their sales. However, we cannot emphasize the callousness of this stance: the Yukon experiments' takeaway strongly implies it is those most concerned about alcohol risk that change attitudes when educated about said risk. To obfuscate those risks is unethical *and* economically counterproductive; Ireland estimates that costs from alcohol-related harms surmount €2 billion annually, and any appeal to economic loss should account for the economic benefits of lowering annual consumption.

As we understand, the current complaint is not even solely that awareness of risks would harm sales. Rather, the industry seems concerned that Ireland's stringent requirements for labeling will create a burden for mass-produced and mass-distributed product. However, it is hard to see how this is true. Irish alcohol sales surpassed 38 million liters of pure alcohol in 2021 (Alcohol Action Ireland, 2022). The argument that complying with labeling for this enormous market impacts economies of scale, or that it is not worth the expense to create an additional label to apply to bottles, is questionable. This is not a small jurisdiction adopting idiosyncratic regulations, it is a high-income country and world economic actor.

California itself can provide a lesson in how to create a navigable regulatory difference. As a result of 1986's popularly passed Prop 65, California uniquely requires cancer warnings on numerous products, in many cases affixed to the actual product.<sup>1</sup> Through additional, modular labels and collective trade group actions to ensure compliance at minimal cost, multiple industries (including alcohol) have been able to comply with more stringent criteria.

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<sup>1</sup> Alcohol carcinogen warnings in California are signed at point of sale, but in this case the problem is *not* that it is too burdensome for the industry to make labels for a market of 40 million. Rather, the U.S. Tax and Trade Bureau has determined a state-mandated change to the labels an abrogation of its powers, and forced California to POS warnings as a compromise.

Of course, all of this ignores the fact that the most elegant move towards uniformity would also save lives in the United States. Ireland's policies are evidence-based and in reaction to a growing but underrecognized body of medical knowledge. The same morbidity and mortality that affects the Irish affects residents of the United States. Looking at deaths in adults between 20 and 64 years of age, 1 in 8 are due to alcohol-related causes, (Esser et al. 2022) and the COVID era has been marked by a deeply concerning 26% spike in the alcohol-related death rate. (White et al., 2022) Treating public health Ireland as a pioneer and co-traveler, rather than a threat to an industry that kills a mid-sized city's worth of Americans every year, would put the United States in step with the world morally, medically, and in terms of duty to its people. For these reasons, Alcohol Justice urges the U.S. delegation at the WTO to support Ireland's labeling policies.

Respectfully,

A handwritten signature in blue ink, appearing to be 'Cruz Avila', written over a light blue rectangular background.

Cruz Avila  
Executive Director  
Alcohol Justice