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## **Re: Defending Ireland's Alcohol Labelling Regulations – A Critical Public Health Imperative**

The **European Health Alliance on Alcohol (EHAA)** expresses its strong support for the timely implementation of Ireland's Public Health (Alcohol) Labelling Regulations, due to come into effect in May 2026. Recent indications that these measures may be delayed or re-examined are deeply concerning and risk undermining a flagship initiative in European public health policy.

EHAA is a coalition of European health organisations representing over 1.2 million medical and healthcare professionals. We work tirelessly to reduce the burden of alcohol-related harm across Europe, and for European citizens, through evidence-based policy advocacy, professional education, and direct engagement with decision-makers. EHAA was formed to ensure our collective voice is heard, to highlight the serious health consequences of alcohol—such as various cancers, liver disease, and emergency department admissions—and to advocate for stronger, evidence-based public health policies.

Ireland's regulations rest on three essential and irrefutable pillars:

### **1. Coherence with Scientific Evidence and EU Regulation**

Ireland's labelling requirements are firmly grounded in EU law and align with the European Union's Beating Cancer Plan and the Commission's stated objectives on improving consumer health literacy. The policy is supported by overwhelming scientific evidence, including the International Agency for Research on Cancer (IARC) findings that alcohol is a Group 1 carcinogen, placing it in the same category as tobacco and asbestos. Even low levels of alcohol consumption are linked to increased risk of cancer and liver, and other diseases.

For doctors and medical professionals, this is not an abstract statistic. It translates into real patients, young mothers with breast cancer, individuals awaiting liver transplants, and families devastated by preventable loss. Far from being an outlier, Ireland's initiative reflects growing consensus across Europe that consumers deserve clear, evidence-based health information. The European Commission has already defended Ireland's approach at the World Trade Organization, affirming it as a proportionate and justified public health response.

### **2. The Citizen's Right to Know**

Providing consumers with accurate, prominent health information is not only a public health responsibility—it is a democratic obligation. Just as with tobacco, food allergens, and medicines, people have the right to know the risks associated with products they consume.

Every day, health professionals witness the consequences of misinformation and the absence of clear warnings: delayed diagnoses, preventable illnesses, and patients unaware of the risks they face. We cannot effectively support or counsel individuals if the broader environment withholds or distorts essential health information. Opposition from the alcohol industry must not override the public's right to make informed choices. Delaying or diluting these labelling measures would represent a serious failure of duty to the public and a significant erosion of consumer protection standards.

### **3. The Social and Economic Cost of Inaction**

Alcohol harm imposes a staggering burden on Ireland's healthcare system and wider society. Alcohol contributes to approximately 1,500 deaths and 1,000 cancer cases annually in Ireland. According to Alcohol Action Ireland the cost to the Irish state, including healthcare, criminal justice, and lost productivity, is estimated at €12 billion per year, i.e. 10 times more than the €1.2 billion generated annually in alcohol excise duties.

Crucially, alcohol also harms Ireland's children and young people. Recent data indicate that 1 in 6 children in Ireland lives in a home impacted by parental alcohol misuse. Such environments are associated with increased risks of neglect, mental health issues, domestic violence, and adverse childhood experiences. Additionally, Ireland has among the highest rates of binge drinking among adolescents in Europe. Early exposure to alcohol increases the likelihood of dependency, academic underachievement, and long-term health complications.

For health professionals, these are not just numbers. They represent overburdened emergency departments, scarce hospital resources diverted from other needs, and patients waiting for treatment of entirely preventable conditions. Without clear labelling and robust public health measures, these costs will continue to escalate, both in financial terms and in human suffering.

EHAA urges the Irish Government to remain steadfast and implement the labelling regulations without delay. Re-examining the policy at this stage, under pressure from commercial interests, would not only weaken Ireland's credibility but risk setting a damaging precedent across Europe.

Ireland has shown global leadership before, in 2004 with the workplace smoking ban, and now has the opportunity to do so again. As medical professionals, we know the evidence is unequivocal. The world is watching. The public is expecting action. And every delay has a human cost.

Yours sincerely,



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On behalf of the **European Health Alliance on Alcohol (EHAA)**

### **Members of European Health Alliance on Alcohol**

European Association for the Study of the Liver (EASL)

United European Gastroenterology (UEG)

European Psychiatric Association (EPA)

European Geriatric Medicine Society (EuGMS)

European Medical Students' Association (EMSA)

World Family Doctors - WONCA Europe

European Federation of the Associations of Dietitians (EFAD)

European Society for Paediatric Gastroenterology, Hepatology and Nutrition (ESPGHAN)

European Cancer Organisation (ECO)

European Society of Radiology (ESR)

European Academy of Pediatrics (EAP)

Standing Committee of European Doctors (CPME)

European Society for Clinical Nutrition and

Metabolism (ESPEN)

Association of European Cancer Leagues (ECL)

European Society of Cardiology (ESC)

International Society of Addiction Medicine (ISAM)

European Society of Emergency Medicine (EUSEM)

European Renal Association (ERA)