**Royal College of Physicians Comment:**

**Public Health (Alcohol) Bill, Ireland, 2015**

The Irish Public Health Alcohol Bill is an outstanding example of public health legislation and is to be applauded. The link between alcohol and cancer is as well proven as the link between tobacco and cancer. The recent joint guideline (1) published by the Chief Medical Officers of England, Scotland and Wales contained the following statements:

* That drinking alcohol increases the risk of developing a range of cancers. The Committee on Carcinogenicity (2) recently concludedthat ‘drinking alcohol increased the risk of getting cancers of the mouth and throat, voice box, gullet, large bowel, liver, of breast cancer in women and probably also cancer of the pancreas’. These risks start from any level of regular drinking and then rise with the amounts of alcohol being drunk.
* The health harms from regular drinking of alcohol can develop over many years. This occurs either from the repeated risk of acute harms (e.g. alcohol-related accidents) or from long term diseases caused by alcohol, which may take ten to twenty years to develop. These illnesses, including various cancers, strokes, heart disease, liver disease, and damage to the brain and nervous system, can develop despite drinking for years without any apparent harm.
* The expert group was also clear that there are a number of serious diseases, including certain cancers, which can occur even when drinking within the weekly guideline. Whilst they judge the risks to be low, this means there is no level of regular drinking that can be considered as completely safe in relation to some cancers. People can reduce these risks by drinking less than the guidelines or by not drinking at all.

It is not acceptable that the alcoholic beverage industry is trying to suppress the communication of this vital health information to the public, and is in fact adopting the same tactics as those previously used by the Tobacco industry to suppress information about the links between smoking and lung cancer, as evidenced by the conclusions of a recent study (3) which found:

*Most of the organisations were found to disseminate misrepresentations of the evidence about the association between alcohol and cancer. Three main industry strategies were identified:*

1. *denial/omission: denying, omitting or disputing the evidence that alcohol consumption increases cancer risk;*
2. *distortion: mentioning cancer, but misrepresenting the risk;*
3. *distraction: focussing discussion away from the independent effects of alcohol on common cancers. Breast cancer and colorectal cancer appeared to be a particular focus for this misrepresentation.*

*The alcohol industry appears to be engaged in the extensive misrepresentation of evidence about the alcohol-related risk of cancer. These activities have parallels with those of the tobacco industry*.

The Royal College of Physicians fully supports the current Irish proposal for alcohol labelling to include information about the risks of cancer to consumers as well as legal restrictions on alcohol marketing and advertising together with the other proposals within the bill, all of which are evidence based.

Dr Andrew Goddard – Registrar

Professor Nick Sheron – RCP Representative on EU Alcohol Policies

1. Department of H. UK Chief Medical Officers' Alcohol Guidelines Review. 2016.

2. Committee on Carcinogenicity of Chemicals in Food CPatEC. Statement on consumption of alcoholic beverages and risk of cancer. 2015.

3. Petticrew M, Maani Hessari N, Knai C, Weiderpass E. How alcohol industry organisations mislead the public about alcohol and cancer. Drug Alcohol Rev. 2018;37(3):293-303.