



# **Comments on the Review of Bill C-222**

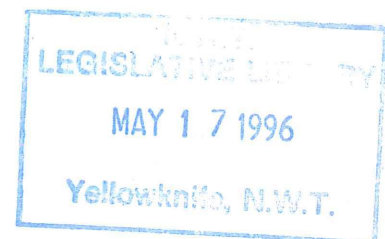
**Text for a Presentation  
to the  
Sub-Committee on Bill C-222**

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**Government of the Northwest Territories**

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**Ottawa**



Thank you, Madam Chair and Good Morning.

My name is Floyd Roland and I am the Member of the Northwest Territories Legislative Assembly for the constituency of Inuvik.

With me this morning are two officials from the Department of Safety and Public Services in Yellowknife: Mr. John Quirke, who is that department's Deputy Minister; and Mr. Alan Downe, who works as a Senior Advisor and has been coordinating a major review of Territorial liquor legislation.

I would like to bring greetings from the Minister of Safety and Public Services, the Honourable Jim Antoine who has been unable to attend these hearings today due to previously scheduled commitments in his constituency of Nahendeh. I know that Mr. Antoine is very interested in the progress of your review of this Private Member's Bill and I am pleased to be able to represent the Government of the Northwest Territories on his behalf.

Madam Chair, the issues you are considering with regard to Bill C-222 are important ones for residents and the Government of the Northwest Territories. We have been concerned, for a long time, about the health and social problems associated with excessive or irresponsible use of alcohol. In recent years, there has been increasing concern over the incidence of fetal alcohol syndrome and effects within our population. Death and injury related to impaired driving or occupational accidents are just as devastating to families and communities in our jurisdiction as they are elsewhere in Canada.

Madam Chair, we believe that, by increasing public awareness of the risks associated with the excessive or irresponsible consumption of alcohol, it is possible to make significant progress in addressing these concerns. We believe that consumers who come to liquor stores in the Northwest Territories, and all across Canada, should be informed that there are certain risks associated with the personal decision they have made about whether to drink liquor and about how much to drink.

That is the reason why, in 1992, the Government of the Northwest Territories approved a policy which resulted in "health warning labels" being affixed to alcohol beverage containers. We have continued to do that ever since. We are one of only two jurisdictions in Canada to do this. The Yukon is the other.

Our labelling program is a mandated responsibility of the NWT Liquor Commission and is carried out through arrangements with the private owners and operators of our liquor stores. Store personnel stick adhesive labels to bottles of wine and spirits, and to the cardboard case or one in each six-can package of beer, prior to their placement on the shelf.

Our experience with this program has been positive. We have found that this labelling is effective in raising consumer awareness of risks associated with the consumption of liquor and that it has been an important, if not essential, component of our health promotion efforts with regard to alcohol.

Because of our experience in this area, Madam Chair, we were pleased to see a bill amending Canada's *Food and Drugs Act* come before the House of Commons, and were even more pleased to see it resurrected following its original death on the Order Paper. We are grateful for the opportunity to provide you with our comments on the bill and our perspective on some of the evidence that has already come before your sub-committee.

We want to say, first, that we strongly support the enactment of Bill C-222. In the Northwest Territories, we know that putting "health warning labels" on alcohol beverage containers is a good thing to do. We know that it is effective. If this Private Member's Bill fails to become law, we will continue to provide our labelling program through the NWT Liquor Commission. Either way, the people of the Northwest Territories will see warning labels when they purchase liquor at stores in our jurisdiction.

However, we believe that general awareness could be strengthened if this message were available to all Canadians. Further, during public consultations undertaken as part of a Territorial *Liquor Law Review*, many participants questioned why the Government, and not the industry, was bearing the responsibility for funding and delivering the labelling program. The proposed amendments to the *Food and Drugs Act* would have the effect of ensuring that a consistent message is provided in all provinces and territories, and it would shift the onus for providing this message to the liquor industry -- where many Northerners feel it belongs.

We have been very interested in your proceedings to date, Madam Chair, and would like to take a few moments to offer comments on some of the evidence that is now before your sub-committee.

Some previous witnesses have claimed that research into "health warning labels" has proven that they are ineffective. We are not convinced that this is true. The most that can be said is that the existing body of research is inconclusive. There are problems in drawing generalizations about studies which have examined "blended" liquor labelling practices in the United States to the effectiveness of warning labels in the Northwest Territories or those proposed in Bill C-222. Also, we have noticed that many studies have tended to examine the impact of warning labels in isolation, rather than considering them as one component of an over-all health promotion strategy.

Madam Chair, we have also followed, with some interest, the presentations you received from some witnesses with regard to the impact of labelling costs on brewers, wineries and distillers in Canada. Frankly, these arguments have been over-stated. There is no denying that there will be some additional costs associated with implementation of new labelling processes but we question whether the impact will be as financially damaging as was suggested by some of your witnesses on May 2nd.

Indeed, in the Northwest Territories, we must have just about the most inefficient process one could imagine for labelling liquor products and virtually no economies of scale. And, still, the total yearly cost of our labelling program is less than \$60,000. We have confidence that our Canadian liquor industry possess the technology and production expertise that will allow them to minimize costs associated with a credible and visible labelling program.

It has also been suggested, however, that if the industry is required to spend money labelling products, it will be unable to support current awareness programs and "responsible use" advertising. Again, we have trouble believing this. We know that there is considerable marketing value attached to the awareness campaigns it has launched.

We know, for instance, that when people see the Canadian Brewers' Association poster of Paul Molitor getting into a taxi to get home safely, they are thinking about the message that one should not drink and drive. But, they also say to themselves, "Hey, Paul Molitor drinks beer!" When Canadian distillers promote the idea that "a drink is a drink", they are also sending a message that consumers should regard spirits in the same way as they do wine and beer. These indirect messages are a powerful way to focus consumer awareness on liquor, even if specific brand names are not mentioned. They also encourage Canadians to think of these companies as "responsible" and "trustworthy". Should we really believe that the liquor industry would forego the opportunity to send out these powerful messages because of the cost of labelling? Probably not.

Finally, we take serious issue with some of the comments that opponents to Bill C-222 would offer with regard to the "unintended harm" of warning labels. We are aware of claims that warning labels cause undue stress to pregnant women and we know that some comments have even been made that labels could even lead to an increase in abortions. We have found this argument offensive and speculative. We use warning labels in the Northwest Territories. They are not causing panic among pregnant women. We find quite the opposite, in fact, in that they stimulate a thoughtful and rational awareness of the risks associated with alcohol consumption during pregnancy.

In short, we support the concept of labelling alcohol beverage containers and would encourage the enactment of Bill C-222. Warning labels send a message that industry and governments, together, recognize that they are selling a unique product and that they are aware that some risks are associated with its use. Warning labels "set the stage" for other awareness programs and health promotion strategies. We would like to see them on alcohol beverage containers in every Canadian province and territory.

At the same time, we would like to offer a number of recommendations with respect to ways in which this bill could be improved:

- labels are more effective when they are clearly visible. We would suggest that specific minimum standards might be included, perhaps in regulations, for the appearance of the label.

These could include requirements for a colour that is distinct from the manufacturer's brand label, a minimum font size and a minimum label size;

- labels are more effective when the message is clear. We would suggest that the message should bear a heading which indicates that it is a "WARNING". We would also encourage the use of plain language. With our NWT labels, we have found it effective to use the word "YOU";
- in the Northwest Territories, we know that impaired driving is not a problem limited only to operators of automobiles. In the North, as in other parts of Canada, people are injured or lose their lives when they drink and drive motorcycles, boats, snowmobiles or all-terrain vehicles. We would encourage changing the message to substitute the words "motor vehicle" for "automobile"; and,
- introduction of this new legislation should be accompanied by a Health Canada strategy aimed at evaluating its effectiveness over a five-year period.

However, none of these recommendations for improvement should be seen as a cause to slow the passage of this bill. We believe that the time for action on this matter is NOW and that minor improvements, if necessary, can be made in concert with, or after, the initial implementation of labelling practices.

In closing, Madam Chair, we want to thank you again for the invitation to appear before your sub-committee and to wish you wisdom in your deliberations on this important bill.

Thank you.

