

# Meeting Growing Regulatory Challenges Regarding Alcohol and Health

Jon Coleman  
15<sup>th</sup> May 2019

# Alcohol and Health

## No healthy level of alcohol consumption, says major study

Governments should consider advising people to abstain entirely, say authors



News > Health

## Alcohol causes one in 20 deaths worldwide, warns World Health Organisation

Three quarters of all deaths attributable to drinking are among men

Harry Cockburn | Saturday 22 September 2018 15:16 | |

12 comments



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## Calls for mandatory health information on alcohol labels

By Katie Silver  
Health reporter, BBC News

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# Alcohol and Health

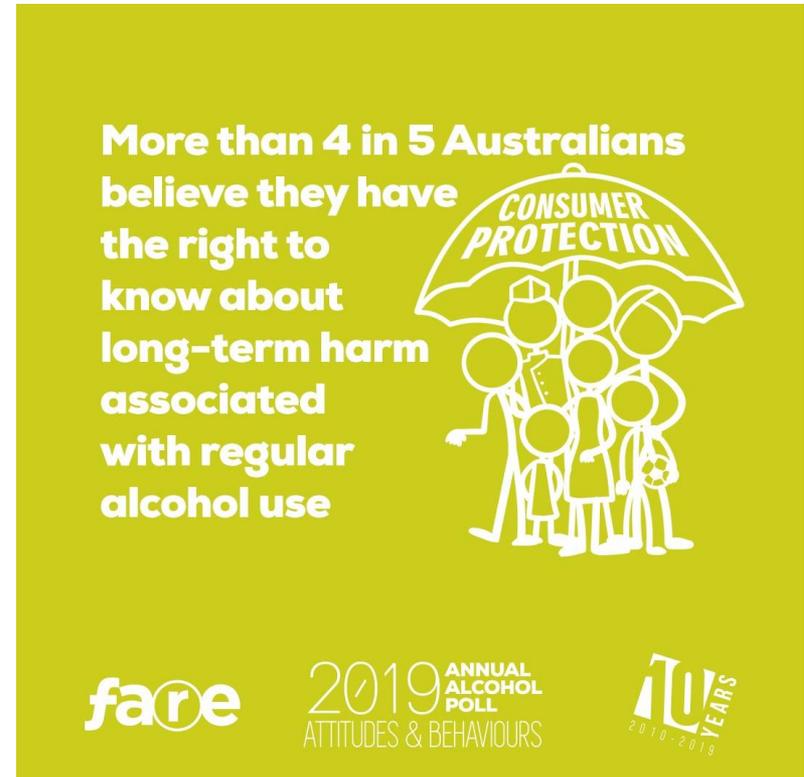
## On regular drinking

**New weekly guideline** *[this applies for people who drink regularly or frequently i.e. most weeks].*

The Chief Medical Officers' guideline for both men and women is that:

- You are safest not to drink regularly more than 14 units per week, to keep health risks from drinking alcohol to a low level.
- If you do drink as much as 14 units per week, it is best to spread this evenly over 3 days or more. If you have one or two heavy drinking sessions, you increase your risks of death from long term illnesses and from accidents and injuries.
- The risk of developing a range of illnesses (including, for example, cancers of the mouth, throat and breast) increases with any amount you drink on a regular basis.
- If you wish to cut down the amount you're drinking, a good way to help achieve this is to have several drink-free days each week.

# Alcohol and Health



- Source: Foundation for Alcohol Research and Education, 2019 Poll (Australia)  
<http://fare.org.au/alcpoll2019/>

# Alcohol and Health

As part of the Commission-mandated study on the impact of food information on consumers' decision making<sup>20</sup>, consumer behaviour vis-à-vis information on alcoholic beverages was investigated. After having been informed about the energy content of alcoholic drinks like beer, wine and spirits, 2031 respondents from 8 Member States were asked about the ideal information to be provided on alcoholic drinks in the future; almost half (49%) of the participants wanted information on the energy value of alcoholic beverages, and 16% declared their intention to reduce their alcohol consumption on the basis of this information.

According to a study<sup>21</sup> carried out in 2014 and commissioned by a brewers' association, consumers' knowledge of the nutritional value and ingredients information of alcoholic beverages is limited. The study aimed at providing a representative overview by involving almost 5400 respondents in six Member States. The results of this study show that consumers have a knowledge deficit of the carbohydrate, calorie and fat content of the different types of alcoholic beverages studied (beer, wine and spirits) and of the different ingredients that can be used in their production. As shown in figure 1, the study also demonstrates that there is a big interest in receiving the same information on ingredients and nutritional values for alcoholic beverages as currently provided for other food and drink products.

# Alcohol and Health

- Growing awareness regarding alcohol and public health
- Additional focus on growing rates of obesity and type 2 diabetes
- As such, growing international trend to:
  - Communicate warnings related to alcohol and health
  - Clearer nutrition information
  - Information on alcoholic drink composition

# HEALTH STATEMENTS – WARNINGS AND CLAIMS

# Lower Alcohol Products

- Growing trend for lower/no-alcohol counterparts to traditional alcoholic drinks
- Subtleties in regulation can pose innovation barrier
- Lack of consistency between markets



# Example of Differences

Strength	Italy	UK	Canada	Sweden
3.6%	Beer	-	Light	Strong beer
2.5%	Beer	-	Extra Light	Regular beer
1.5%	Beer	-	Extra Light	Light beer
1.1%	Non alcoholic beer	Low alcohol	Extra Light	Light beer
0.5%	Non alcoholic beer	Dealcoholised	0.5% alcohol beer	Light beer
0.05%	Non alcoholic beer	Alcohol free	0.05% alcohol beer	Light beer
0%	Non alcoholic	Alcohol free	Malt beverage	Light beer

# Example of Differences (cont)

Strength	Australia/NZ	China	USA
3.6%	-	-	
2.5%	-	Low alcohol	Low alcohol
1.5%	-	Low alcohol	Low alcohol
1.1%	Low alcohol	Low alcohol	Low alcohol
0.5%	Non intoxicating	Non alcoholic	Malt beverage, cereal beverage or near beer
0.05%	Non intoxicating	Non alcoholic	
0%	Non alcoholic	Non alcoholic	

# Lower Alcohol Products

- UK rules now in guidance from Dec 2018

**Low alcohol** – the drink must be 1.2% alcohol by volume (abv) or below and an indication of its maximum abv should be included on the label.

**Non-alcoholic** – this should not be used in conjunction with a name commonly associated with an alcoholic drink. There is an exception for non-alcoholic wine where it is derived from unfermented grape juice and is intended exclusively for communion or sacramental use. The labelling or advertising of these non-alcoholic wine should make it clear that it is exclusively for such use.

**Alcohol free** – this should only be applied to a drink from which the alcohol has been extracted if it contains no more than 0.05% abv, and the products should also include the abv (or state that they contain no alcohol) on the label in order to use the descriptor.

**De-alcoholised** – this term should only be applied to a drink from which the alcohol has been extracted if it contains no more than 0.5% abv and the product should also include an indication of its alcoholic strength (or state that it contains no alcohol).

# Lower Alcohol Products

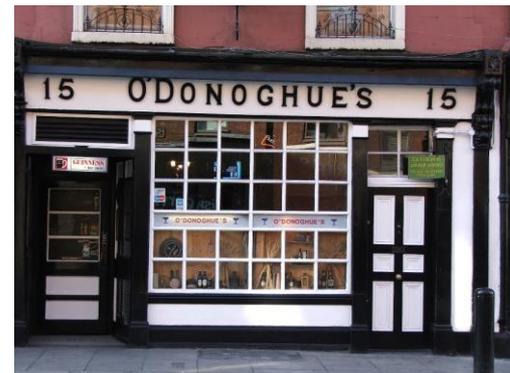
- For those above 1.2%, no descriptors established
- Consultation explored this, found no term with public resonance
- Can use reduced alcohol, if 30% reduced compared to reference product
- Reduced energy also possible if 30% reduced compared to reference product
- These can both be used in the form “light”

# Public Health Alcohol Act (ROI)

- Public Health Alcohol Act 2018 has been passed in the Republic of Ireland
- This will require warnings linking alcohol to fatal cancers, and danger of consumption in pregnancy
- Also requires energy declaration, grams of alcohol per container and details of public health website regarding alcohol consumption
- Irish “unit” differs from “UK unit”

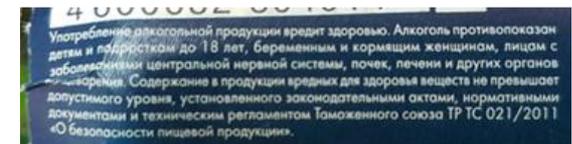
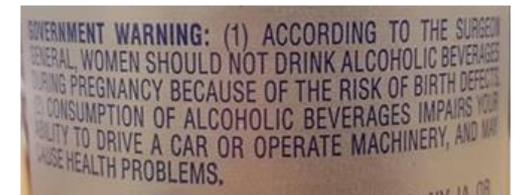
# Public Health Alcohol Act (ROI)

- Notices with warnings will also be required in licenced premises – in both English and Irish
- Prescribed forms for the warnings will be established in regulation
- Will enter into force from 3 years after an order from the Minister of Health



# Health Warnings Overseas

- Growing trend for mandatory labelling regarding pregnancy (France, Lithuania, now Ireland)
- Australia looking to make this mandatory following failure of self regulation by industry
- Warning labelling is getting stronger:
  - Korea and Ireland reference cancer
  - South Africa – 7 rotating warnings



# PRODUCT COMPOSITION

# Nutrition Labelling – A Recap

- As it stands, alcoholic drinks may declare energy only, or full declaration:
  - Energy (kJ/kcal)
  - Fat (g)
    - Of which saturates (g)
  - Carbohydrates (g)
    - Of which sugars (g)
  - Protein (g)
  - Salt (g)

# Nutrition Labelling

- Must be per 100ml
- Must be in table format
- ...but may be linear if space does not permit.

Nutrition Information	Per 100ml
Energy	139 kJ / 33 kcal
Fat	0g
Of which saturates	0g
Carbohydrates	2.2g
Of which sugars	2.2g
Protein	0.3g
Salt	0.02g

**Nutrition Information per 100ml:  
Energy 139 kJ / 33 kcal, Fat 0g, Of  
which saturates 0g, Carbohydrates  
2.2g, Of which sugars 2.2g, Protein  
0.3g, Salt 0.02g**

If certain elements are negligible, they may be omitted from table, but still need declaring...

# Nutrition Labelling

- Must be per 100ml
- Must be in table format

Nutrition Information	Per 100ml
Energy	139 kJ / 33 kcal
Carbohydrates	2.2g
Of which sugars	2.2g
Salt	0.02g

Contains negligible amount of fats, saturates and protein.



If certain elements are negligible, they may be omitted from table, but still need declaring...

- ...but may be linear if space does not permit.

**Nutrition Information per 100ml:  
Energy 139 kJ / 33 kcal, Fat 0g, Of which saturates 0g, Carbohydrates 2.2g, Of which sugars 2.2g, Protein 0.3g, Salt 0.02g**

# Nutrition Labelling

- European Commission keen for industry to provide nutrition information on pack
- Looking to avoid legislating for this
- Brewing industry have shown willingness to provide – other sectors less so
- Public Health (Alcohol) Act in Ireland will require the labelling of energy as a minimum on alcoholic beverages

# Beer Sector Pledge

- The Brewing Sector reiterated the Brewers of Europe commitment made in 2015
- This would provide information as required by FIC (i.e. complete nutrition information per 100ml), either on label, or off label but easily accessible from the label
- 2018 – commitment expanded to provide information on pack



# Ingredient Labelling

- Already required on beer in several EU Member States, including Germany and Portugal
- Fewer health related implications, but challenges for brewers:
  - Declaration of caramel colourings
  - Declaration of sugar/other cereals
  - Declaration of hop products
  - Yeast – ingredient or processing aid



# Reaction to Proposals



- The Commission has given a rather negative reaction to the proposals
- At Standing Committee, six Member States expressed strong reservations
- Complaints regarding the off-label elements of the proposals, as well as the lack of uniformity between the sectors
- Lawyers for the Commission have found legal issues with the proposals

(18) Article 119 is amended as follows:

(a) ~~in~~ paragraph 1, ~~the introductory sentence is replaced by the following~~ *is amended as follows:*

(i) *the introductory sentence is replaced by the following:*

'Labelling and presentation of the products referred to in points 1 to 11, 13, 15, 16, 18 and 19 of Part II of Annex VII marketed in the Union or for export shall contain the following compulsory particulars:';

(ii) *the following points are added:*

*'h) the nutrition declaration pursuant to Article 9 of Regulation (EU) No 1169/2011, which may be limited to the energy value only;*

*i) the list of ingredients pursuant to Article 9 of Regulation (EU) No 1169/2011, which may be provided in electronic form identified on the label or packaging.'*

# Key Messages

- Consumers demanding more information – both on health and composition
- Regulators keen to ensure this is provided – possible trend to move away from industry self regulation
- Innovation possible in lower alcohol space – however different standards globally can hinder

# Thank You

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