

eurocare

European Alcohol Policy Alliance

THE LABELLING ISSUE A EUROPEAN UPDATE



Alcohol Policy Network in Europe

Edinburgh 19 November 2018



The **European Alcohol Policy Alliance** was formed in 1990 with 9 member organisations

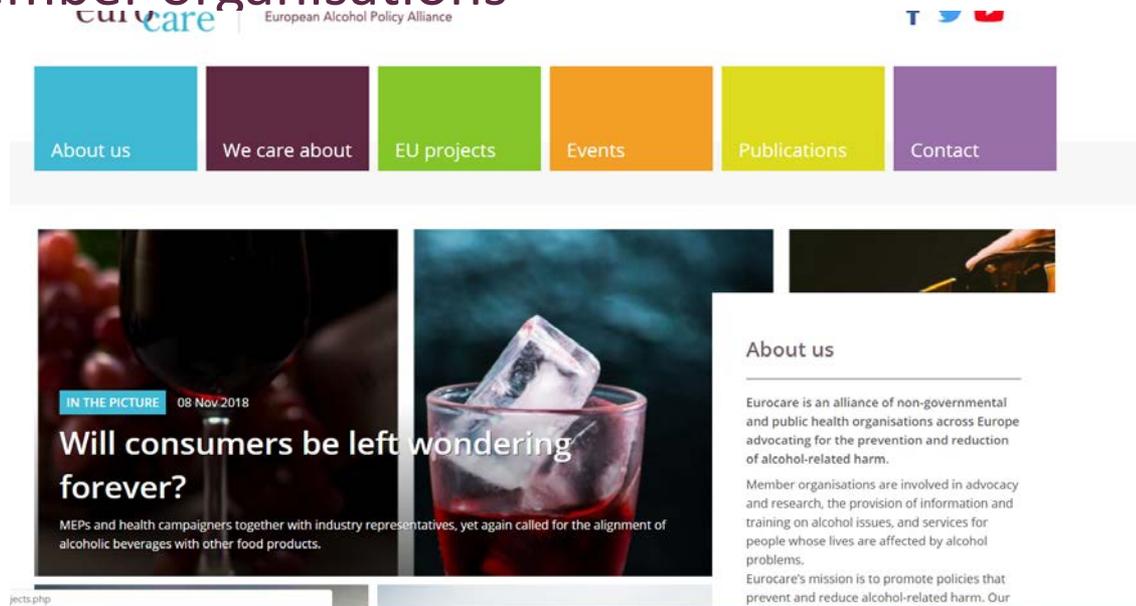
Today:

- 5 members



- 3 countries

- Secretariat in Brussels



Raising awareness among decision makers of the harms caused by alcohol (social, health and economic burden) ensuring that these are taken into consideration in all relevant EU policy discussions

Promoting the development and implementation of **evidence-based policies** aimed at effectively preventing and reducing this burden



TO RECAP

- EU law 1169/2011: requires nutritional declaration (per 100ml/g) and ingredients for all food and beverages
- Alcoholic beverages were exempted
- European Commission report: March 2017
 - “... **the Commission has not identified objective grounds**’ to justify the exemption
- Alcohol companies given a year to come up with a self-regulatory proposal





Brussels, 13.3.2017
COM(2017) 58 final

**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND
THE COUNCIL**

**regarding the mandatory labelling of the list of ingredients and the nutrition declaration
of alcoholic beverages**

**A self-regulatory proposal was delivered to the European
Commission on the 12 March 2018**



- The nutrition information and the list of ingredients of our products will be provided to consumers **off-label and/or on label** where information provided off-label will be easily accessible from the label itself, either by a **web-link, a QR code, a bar code** or through other direct means using smart technologies.

- The sectors will use traditional and/or innovative tools and may develop comprehensive modern information systems to provide useful information to consumers.



- **Food business operators responsible for the food information will decide how to display the information.**

- The information, while abiding to the legal framework laid down in EU or national legislations, will be provided in line with the principles set in this joint proposal and the **sectors' annexes.**



- Wants to provide information off-label, barcodes, web-link, www.wineinmoderation.eu, an icon or other etc.
- Gives producers the possibility to limit information to the energy value only
- Tries to establish special case for wine ‘specificities of the wine sector’ arguing it is not an industrial product
- Want legal certainty on interpretation of wine processing aids
- Gives wine producers 3 options to choose from to communicate ingredients
- Does not provide details, ‘more details regarding the implementation modalities will be provided in the sectoral guidelines’
- Only in 2021 will start linking the bottle to the online communication platforms



- Off-label solution as the preferred one, QR codes, websites etc.
- Wants to provide information per serving, indicating that 100ml is ‘misleading’ to consumers; asking the Commission to change/abandon standard measurement reference. Clearly wanting to start a public discussion on this aspect
- 100ml will be contradictory to ‘responsible drinking’ messages implying even legal suits. Please remember ‘drink responsibly’ is industry self-imposed messaging
- Provision information per 100ml might undermine the ‘low drinking guidelines’



Summary of analysis of the industry proposal

1. Industry failed to propose sector wide solution, individual annexes show discrepancies in implementation and interpretation of the EU Reg 1169/2011 i.e. 100ml vs. serving size
2. Wine and spirits industries predominantly propose off label solution i.e. QR codes, bar codes, websites etc.
3. Leaves a lot of room up to the operator how to provide information i.e. wine annex options for ingredients lists
4. Creates impression of lack of willingness to follow the spirit of the legislation i.e. discussion serving size vs. 100ml makes us doubt the seriousness of the commitment
5. Using delaying tactics (2021) to argue for further exemptions *'(...)specificities need to be adequately reflected when constructing rules on information on nutrition and ingredients (...)'*

Providing information online is enough as we all go online

- 16% of the consumers would only use digital online sources to access information regarding ingredients, (Gfk 2016)
- 17% would only use digital online sources to access information regarding nutritional values (Gfk, 2016)
- Only 24.7% of the respondents search for information online regarding ingredients or additives in their alcoholic beverages (RARHA, 2015)

We do not have to go online to check calories for apple juice

Why should we for wine



It is hard to accommodate everything comfortably on the label (Spirits Annex)



Wine producers would have extra costs to change labels every year



1.

Proposal is not meeting the requirements, it creates labelling *à la carte*

2.

Alcohol industry does not deserve such special treatment and **consumers deserve better** – joint press statement



Exemption from EU Reg 1169/2011 should be ended as soon as possible (simply by aligning alcoholic beverages with the Regulation), to ensure the industry proposal does not create a labelling confusion.



EMBARGOED 4PM 7 NOVEMBER 2018

PRESS RELEASE

Brussels, Belgium, 7th November 2018

Will consumers be left wondering forever?



Commission's reaction to industry proposal

Officially, no statement on the way forward.

Commissioner's letters in response to different organizations' requests, expressing dissatisfaction with the industry proposal

The European Commission is taking now more than half a year to assess the self-regulatory proposal. In the meantime, consumers are still being left to wonder what they are really drinking.

86% of consumers call for the list of ingredients of alcoholic drinks to be provided, as is the case for other food and drink products.



50.4% would like to have more information about **ingredient listing**



43.2% would like to have more information regarding **calorie content**



37.9% would like to have more information about **nutritional value**

Eurocare recommendations

Containers should be required to provide the following information:

- Ingredients
- Substances with allergenic effect
- Relevant nutrition information (energy values, kcal)
- Alcoholic strength mg/ml
- Rotating health information on front pack/label

It is the right of the consumer to be allowed to make informed choices

It is the obligation of public institutions to ensure consumers are able to make informed choices



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Thank you for your attention

#RightToKnow

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