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Analysis of the Alcohol Industry Self-Regulatory Proposal for Labelling of Alcoholic Beverages

CNAPA Meeting
20 March, Luxembourg

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

Today:

- 59 members
- 24 countries
- Secretariat in Brussels

@EUROCAREBRUSSEL

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Eurocare Goals

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

Calling for better labelling from 2010

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Preliminary library of alcohol health information and warning labels

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What's in this drink?
Eurocare's position on ingredients and nutritional information
2018

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Library of ALCOHOL HEALTH WARNING LABELS

What's not on the bottle?
Eurocare Reflections On Alcohol Labelling
2014

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Currently in the EU…

Nutrition Facts
Serving Size 1 cup (240 mL)
Servings Per Container 4

Amount Per Serving	
Calories 150	Calories from Fat 70
	% Daily Value*
Total Fat 8g	12%
Saturated Fat 5g	25%
Trans Fat 0g	
Cholesterol 30mg	10%
Sodium 105mg	4%
Total Carbohydrate 12g	4%
Dietary Fiber 0g	0%
Sugars 12g	
Protein 8g	

Vitamin A 6% • Vitamin C 0%
Calcium 30% • Iron 6%

*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:
Fat 9 • Carbohydrate 4 • Protein 4

Does NOT cause cancer and 60 other diseases

Is NOT addictive

Is NOT third leading risk factor for chronic disease

PROVIDES information to consumers

DOES cause cancer and 60 other diseases

IS addictive

IS third leading risk factor for chronic disease

DOES NOT provide any information

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Eurocare recommendations

End the exemption of alcoholic beverages from EU Reg 1169/2011, meaning:

- Provision of information on the bottles in form of labels
- Provision of information per 100ml, additionally per serving size can be included
- Applying to the sector as a whole, no separate labelling regimes for wine, beer and spirits
- Nutrition declaration composed of:

- Energy value (kJ/kcal)
- Fat (g)
- Saturated fat (g)
- Carbohydrates (g)
- Sugars (g)
- Proteins (g)
- Salt (g)

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Nutrition Information	Per 100ml
Energy values	1021kJ/244kcal
Fat	-
(Of which) saturated fat	-
Carbohydrates	-
(of which) sugars	-
Proteins	-
Salt	0.001g

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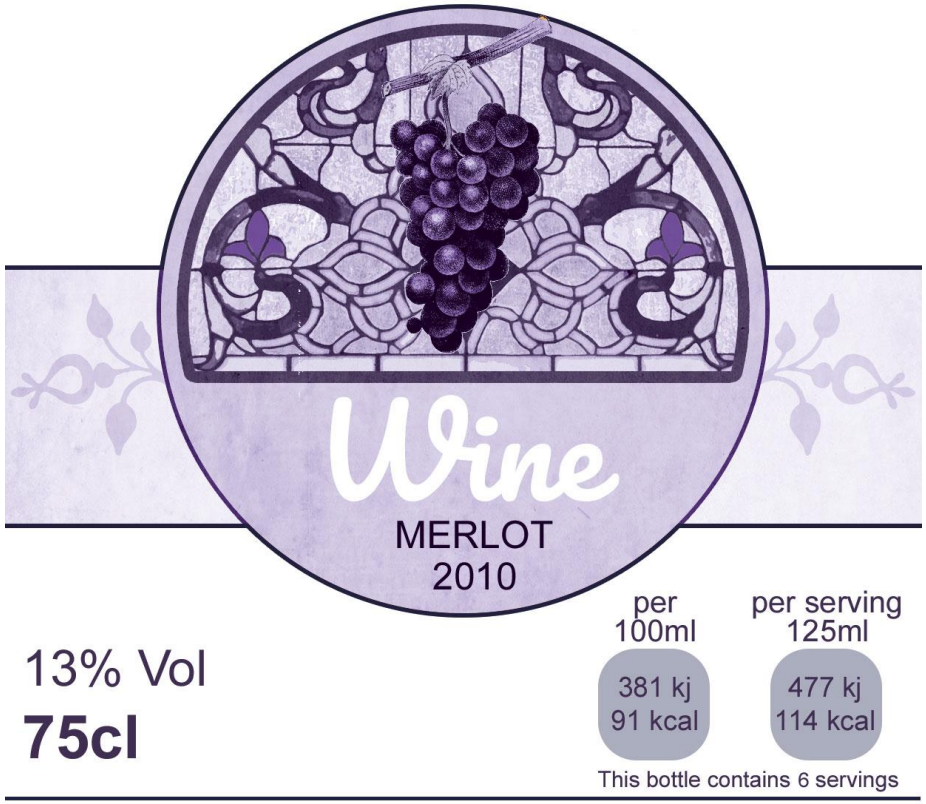

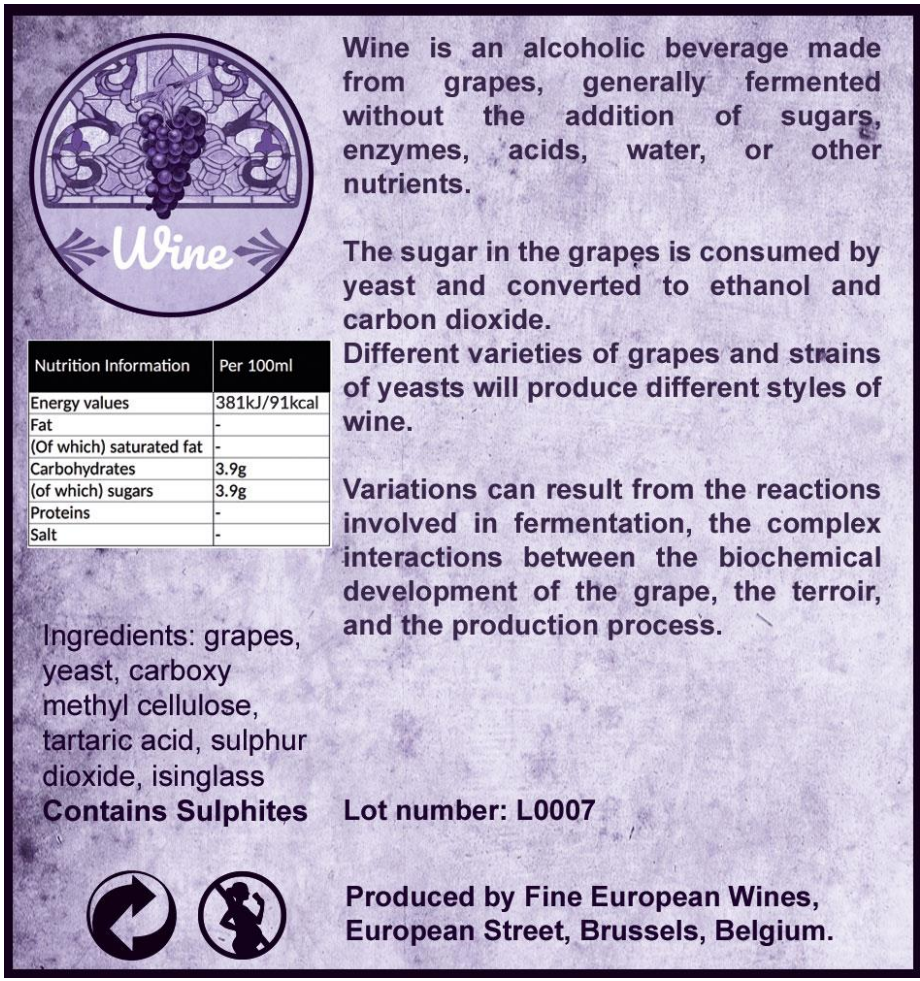

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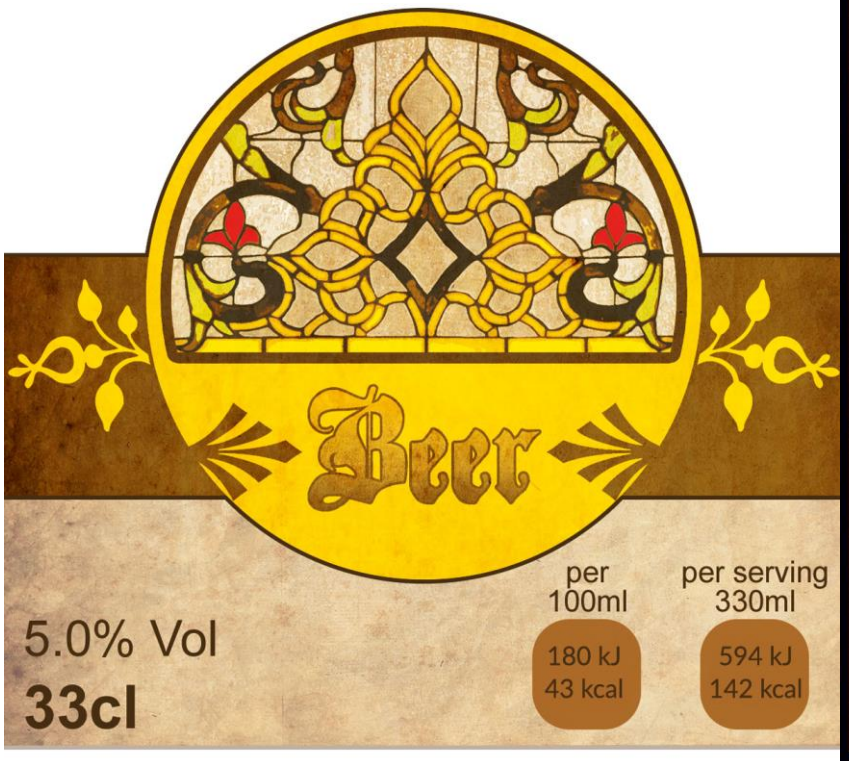

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Industry proposal

- 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.

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Industry positions - wine

- 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

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Industry positions - spirits

- 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

- Quoting that 100ml will be contradictory to 'responsible drinking' messages implying even legal suits. Please remember 'drink responsibly' is industry self-imposed messaging

- Implying provision information per 100ml might underminine the 'low drinking guidelines'

- On label information might be limited to energy only

- Claims that there is a 'standard serving' for each sector – 30ml spirits, 100ml - wine, 250ml - beer

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All information online?

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Information provided online – Please search and see!

Ballantine's FINEST

NUTRITIONAL INFORMATION

Per 10g of alcohol (31ml)

Alcohol (g) 10, Calories (Kcal) 69, Fat (g) 0, Saturates (g) 0, Carbohydrates (g) 0, Sugar (g) 0, Proteins (g) 0, Salt (g) 0, Allergens (see note 1)

Nutritional information, Malibu Original

21% ABV
Serving size: 50 ml
Servings per container: 14 (700 ml)

Nutritional	Per 10g of alcohol (60 ml)	Per serving (50 ml)
Alcohol (g)	10	8.3
Calories (Kcal)	121	100
Fat (g)	0	0
Saturated Fats (g)	0	0
Carbs (g)	13	11
Sugar (g)	13	11
Proteins (g)	0	0

For additional nutritional information please follow this link.

VINS DE BORDEAUX

WINE SCHOOL EN

CHOOSING A WINE | THE ART OF TASTING | OUR TERROIR | OUR KNOW-HOW | BORDEAUX MAGAZINE | WINE TUNE'S PLATFORM

STORING WINE | WINE SERVICE ; BOTTLES, GLASSES ET ACCESSORIES | FOOD AND WINE PAIRINGS

GRAPE VARIETIES
Cabernet Franc, Merlot

SOIL
Gravelly and sandy rock surface mixed with iron oxides, known as "crasse de fer"

SURFACE AREA
792 ha

WEBSITE
www.vins-pomerol.fr

TASTE
Refined, powerful, intense, and sensual

AGING POTENTIAL
5 - 30 years

SERVING TEMPERATURE
59-62.6° F

Pripps Blå Pure

Beer type: Pale Lager **ABV:** 4.8%

Brand Origin: Sweden

Pripps Blå Pure is a refreshing pale lager with 50% less calories than other beers with the same alcohol content. This beer is refreshing and has a pleasantly balanced and full-bodied taste.

Pripps Blå Pure was first launched to the market in April 2006. Soon after its launch, Pripps Blå Pure became a popular alternative to regular beers.

Industry would like us to believe that

Consumers are familiar with finding information through their smartphones. Off-label information is the norm now
(Spirits annex)

- 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

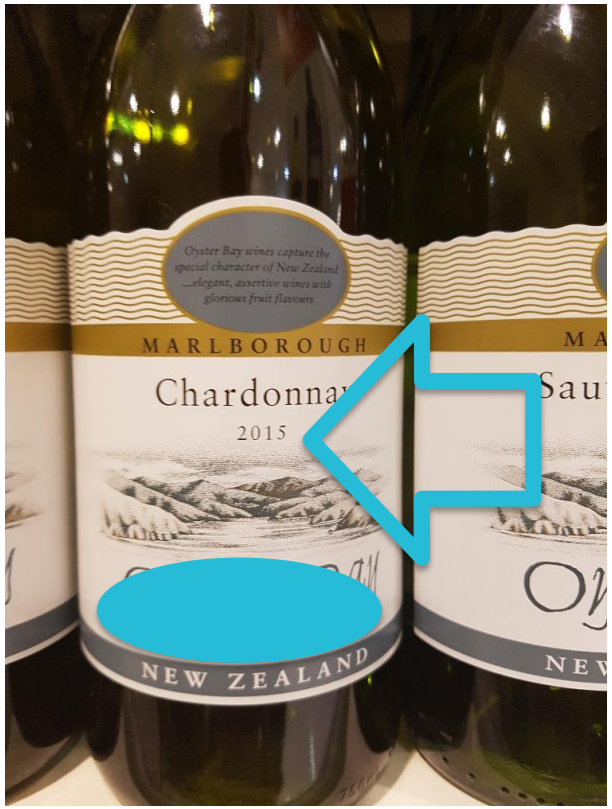
Why should we for wine

Industry would like us to believe that

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

Industry would like us to believe that

Producers would have extra costs to change labels every year



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What a difference binding legislation makes – same company

Wine without alcohol
PROVIDES information to consumers

Wine with alcohol
DOES NOT provide information to consumers

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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 (…)'*

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Eurocare position

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.

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

Please register www.8eapc.eu

8th European Alcohol Policy Conference

20-21 November 2018

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