

# eurocare

European Alcohol Policy Alliance

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



CNAPA Meeting  
20 March, Luxembourg

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

Today:

- 59 members
- 24 countries
- Secretariat in Brussels



@EUROCAREBRUSSEL

The screenshot shows the Eurocare website homepage with the following sections:

- Navigation:** Home, About Us, Resources, EU Projects, Media Centre, Contact, Search.
- Word Cloud:** A word cloud featuring terms like "regulation of marketing", "reduction in total alcohol consumption", "taxes is better", "safer drinking environments", "better monitoring", "alcohol consumption", "road protection", "information to consumer", "labelling", "young people", "prevention", "data evidence based policy", "safety early", "interventions", "health risk", "carcinogenic alcohol", "liver cirrhosis", "less", "regulated advertising", "increase in excise duties", "and pregnancy", "consumer", "alcohol related", "harm", "protection", "equality in health".
- In focus:** A call for action graphic with a red circle and a wine glass icon, titled "A CALL FOR ACTION". Below it, text reads: "Eurocare - Initial NGO recommendations for the new EU Action Plan on Alcohol".
- Upcoming events:**
  - Regional European Alcohol Policy Youth Conference (16-22.12.2013) Moldova
  - INEBRIA 11th congress (18.-19.09.2014) Warsaw
  - 9th International Conference on nightlife, substance use and related health issues (17-19.06.2014) Lisbon
  - 6th European Alcohol Policy Conference, 27-28 November 2014, Brussels
- Connect with us:** Social media links for Twitter ("follow us on twitter") and Facebook ("Like us on Facebook").
- Our newsletter:** A subscription form with fields for "Username" and "Pass word", and a "Members Only" button.
- We care about:** A list of topics: EU Alcohol Strategy, Alcohol and Inequalities, Alcohol Policy and the WHO, Marketing, Labelling, Pricing and Taxation, Alcohol and Pregnancy.
- Eurocare Updates:**
  - 12/12/2013:** Report shows support for minimum alcohol pricing in the UK. Eurocare member- the Institute of Alcohol Studies (IAS) has published an analysis of submissions to the Home Office consultation on minimum pricing that indicates public support for the policy was greater than previously thought.
  - 10/12/2013:** European alcohol strategy is still valid. We are fighting for documents. Alcohol policy documents that should become a basis for real life alcohol policies that will regulate the way alcohol is produced, sold and marketed. Also the way people should behave and act when it comes to drinking.

**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



Preliminary library of alcohol health information and warning labels

What's in this drink?

Eurocare's position on ingredients and nutritional information

2018

What's not on the bottle?

Eurocare Reflections On Alcohol Labelling

2014



Library of ALCOHOL HEALTH WARNING LABELS

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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 diet of other people's misdeeds.	
Calories 2,000 2,500	
Total Fat	Less Than 5g 8g
Saturated Fat	Less Than 20g 25g
Cholesterol	Less Than 300mg 300mg
Sodium	Less Than 2,400mg 2,400mg
Total Carbohydrate	25g 35g
Dietary Fiber	25g 35g
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

### 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)





40% Vol  
75cl

	per 100ml	per serving 25ml
	1021 kJ	255 kJ
	244 kcal	61 kcal



Vodka is a distilled beverage composed primarily of water and ethanol, sometimes with traces of impurities and flavourings. Traditionally, vodka is made by the distillation of fermented cereal grains or potatoes, though some modern brands use fruits or sugar as substitutes.

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

Since the late nineteenth century, the standard Polish, Russian, Belarusian, Ukrainian, Estonian, Latvian, Lithuanian and Czech vodkas are 40% ABV. To be named a "European vodka", the European Union has established a minimum of 37.5% ABV.

Ingredients:  
yeast, potatoes,  
flavour additives

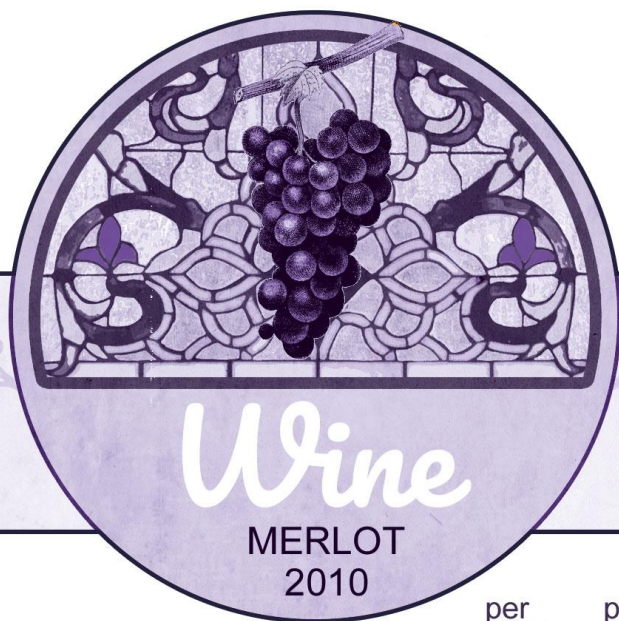
Produced from  
potatoes

Lot number: L0007



Produced by Fine European Spirits,  
European Street, Brussels, Belgium.





13% Vol  
75cl

per 100ml	per serving 125ml
381 kj 91 kcal	477 kj 114 kcal

This bottle contains 6 servings



Wine is an alcoholic beverage made from grapes, generally fermented without the addition of sugars, enzymes, acids, water, or other nutrients.

The sugar in the grapes is consumed by yeast and converted to ethanol and carbon dioxide.

Different varieties of grapes and strains of yeasts will produce different styles of wine.

Variations can result from the reactions involved in fermentation, the complex interactions between the biochemical development of the grape, the terroir, and the production process.

Nutrition Information	Per 100ml
Energy values	381kJ/91kcal
Fat	-
(Of which) saturated fat	-
Carbohydrates	3.9g
(of which) sugars	3.9g
Proteins	-
Salt	-

Ingredients: grapes, yeast, carboxy methyl cellulose, tartaric acid, sulphur dioxide, isinglass

**Contains Sulphites**

Lot number: L0007



Produced by Fine European Wines,  
European Street, Brussels, Belgium.





5.0% Vol  
33cl

per  
100ml

180 kJ  
43 kcal

per serving  
330ml

594 kJ  
142 kcal



Nutrition Information	Per 100ml
Energy values	180 kJ / 43 kcal
Fat	-
(Of which) saturated fat	-
Carbohydrates	6.7g
(of which) sugars	2g
Proteins	0.5g
Salt	0.01g

Ingredients:  
water, **barley**,  
maize and hops



Beer is the world's most widely consumed alcoholic beverage; following water and tea, it is also the third-most popular drink. Beer is thought by some to be the oldest fermented beverage.

Beer is produced by the saccharification of starch and the resulting sugar's fermentation. Both the starch and saccharification enzymes are often derived from cereal grains, commonly malted barley and malted wheat.

Due to their lower cost, unmalted maize and rice are widely used adjuncts to lighten the flavour. The preparation of beer is called brewing.

Beer is generally flavoured with hops, adding bitterness and acting as a natural preservative. Herbs and fruit are occasionally added as other flavourings.

Best before: End March 2018

Lot number: L0007

Produced by Fine European Beers,  
European Street, Brussels, Belgium.



- 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](http://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
- 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 undermine 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



## All information online?





## 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](#).

**BORDEAUX** VIINS DE *B*

CHOOSING A WINE | THE ART OF TASTING | OUR TERROIR | OUR KNOW-HOW | BORDEAUX MAGAZINE | WINE SCHOOL | EN

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 "craisse de fer"

**SURFACE AREA**  
792 ha

**WEBSITE**  
[www.vins-pomerol.fr](http://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)*





*Producers would have extra costs to change labels every year*



What a difference binding  
legislation makes – same  
company



Wine **without** alcohol  
**PROVIDES** information to consumers

Wine **with** alcohol  
**DOES NOT** provide information to  
consumers

## 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 (...)'*

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](http://www.8eapc.eu)  
8<sup>th</sup> European Alcohol Policy Conference  
20-21 November 2018**

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