

### Summary

- Alcohol labelling is a simple and effective way to communicate health information to the public and address the limited awareness of alcohol harms.
- There is currently no requirement for alcoholic drinks to display important health information such as the drinking guidelines, health warnings or calorie content.
- The alcohol industry has shown it cannot be trusted to provide this information voluntarily.
- The Scottish Government should mandate the provision of health information, such as drinking guidelines, health warnings, ingredients, and nutritional information on alcohol labels.

### Limited awareness of alcohol harm

Alcohol consumption remains far too high in Scotland. The majority (81%) of adults drink alcohol and **around one in four (22%) report drinking at hazardous or harmful levels**, defined as exceeding the UK Chief Medical Officers' weekly drinking guideline of 14 units per week.<sup>1</sup>

Alcohol **causes over 200 diseases and conditions**,<sup>2</sup> and claims **over 50 lives each week** in Scotland.<sup>3</sup> A large proportion of these deaths are from alcohol-related cancers; for example, **alcohol is responsible for 1 in 8 female deaths from breast cancer** and nearly **1 in 2 male deaths from mouth and throat cancer**.<sup>4</sup>

Despite alcohol's significant health impact, **public awareness of alcohol harm is limited:**

**77%** don't know the **weekly drinking guidelines**<sup>5</sup>

**1 in 2** don't know that **alcohol causes cancer**<sup>6</sup>

**4 in 5** don't know how many **units** are in their drinks<sup>7</sup>

**3 in 4** don't know the **calorie content** of drinks<sup>8</sup>

### Alcohol labelling is simple and effective <sup>5678</sup>

Providing information via labels is a key way for people to access health information and advice at the point of purchase and consumption, helping to **address current low levels of knowledge of alcohol harm**. Improved labelling would help meet people's **need for information**.

Health warnings on **tobacco packaging** have been considered essential in informing consumers about the health effects of smoking.<sup>9</sup> Tobacco packaging has been required to display a combined written and pictorial warning covering a range of smoking-related conditions, including cancer, in the UK since 2008.<sup>10</sup> **Pictorial warnings on tobacco packaging have increased intentions to quit smoking, reduced cigarette consumption and reduced the likelihood of smoking uptake.**<sup>11 12</sup>

Alcohol labelling research suggests that **presenting unit information alongside drinking guidelines would improve consumer understanding**.<sup>13</sup> Evidence also indicates that nutrition labels can improve drinkers' ability to estimate the calorie content of alcoholic drinks, although evidence is inconsistent on their effect on consumption.<sup>14</sup>

Studies suggest that including **health warnings on alcohol labels would raise awareness of health risks** and may **encourage reduced consumption**.<sup>13 14</sup> Specific warnings, such as for **cancer**, were found to be particularly effective.<sup>13</sup> For example, a Canadian intervention found that prominent labels with drinking guidelines, a cancer warning, and unit information led to **increased awareness and knowledge of drinking guidelines**<sup>15</sup> and **alcohol's role in causing cancer**,<sup>16</sup> as well as a **6.3% reduction in consumption**.<sup>17</sup>

## Failure of self-regulation

At present, alcohol labels across the UK are only required to display the strength of the product (% ABV) and whether the product contains any of the top 14 allergens. **There is no requirement for alcoholic drinks to display the drinking guidelines, health warnings, or information that other food products must provide, such as ingredients and nutritional content.**

In stark contrast to the mandatory labelling requirements for all other food and drink products, which are independently regulated,<sup>18</sup> alcoholic drinks labelling currently **relies on voluntary adherence to UK Government and industry guidance.**


Letting alcohol producers decide what health information to include on their products has resulted in **very little information being provided to consumers.** Industry guidance emphasises signposting to industry-funded websites instead of displaying the information on the packaging.<sup>19</sup> Such websites have been shown to **misrepresent the evidence of the health harms of drinking,**<sup>20 21</sup> and research has found that responsible drinking messages are **strategically ambiguous and ineffective.**<sup>22 23</sup>

A review into alcohol labelling in the UK in June 2022 found that **more than a third (35%) of products failed to display current drinking guidelines** and **97% did not warn of the dangers to health** from drinking.<sup>24</sup> **Only 5% of products in this study displayed full nutritional information,** highlighting a significant gap in on-pack information available to consumers. It is not in the interests of industry to make health warnings, calorie, and nutritional information easily accessible to consumers.<sup>25</sup>

## Public support of mandatory health information

The **public support mandatory labelling.**<sup>26</sup> This includes legally requiring the following information on alcoholic drinks labels:

- The number of units (77% support)
- A pregnancy warning (57% support)
- Nutritional information, such as calories and sugar content (56% support)
- Information on health conditions caused by alcohol, such as cancer, liver disease and dependency (53% support)
- Ingredients (51% support)



*"They'll make it as small and unnoticeable as possible because, let's be honest, promoting the fact that you know you shouldn't be drinking this isn't going to sell bottles."*

Focus Group Participant<sup>26</sup>

This is supported by focus group research with young adult drinkers, which also found that the **Scottish public don't trust alcohol manufacturers to include information voluntarily.**<sup>27</sup>

## Time to mandate alcohol labelling

Alcohol labelling should be subject to statutory regulation to protect and promote the public's rights to health and consumer protection, free from industry influence. The content and design of information should be specified, in line with World Health Organization recommendations.

Such an approach has recently been taken by Ireland, who legislated in 2018 to mandate alcohol labelling as part of its comprehensive Public Health (Alcohol) Bill. Alcoholic drinks will be required from 2026 to display health, pregnancy and cancer warnings, and the product's alcohol and calorie content, with the content and design of labels specified in regulations.

The Scottish Government committed in their Alcohol Framework in 2018 that they "...will press alcohol producers to place health information on physical product and packaging labels – and **will be prepared to consider pursuing a mandatory approach in Scotland** if the UK Government's deadline of September 2019 is not met."<sup>28</sup> The UK Government announced in 2020 their **intention to consult on calorie labelling** for alcoholic drinks on a four-nation basis. However, **no action has been taken** on alcohol labelling by either the Scottish or UK Government to deliver on these commitments.

**The Scottish Government should not wait for the UK Government to mandate the provision of unit content, drinking guidelines, health warnings, ingredients, and nutritional information on alcohol labels.**

## About Alcohol Focus Scotland

[Alcohol Focus Scotland \(AFS\)](#) is the national charity working to prevent and reduce alcohol harm. We want to see fewer people have their health damaged or lives cut short due to alcohol, fewer children and families suffering as a result of other people's drinking, and communities free from alcohol-related crime and violence.

## References

- <sup>1</sup> Birtwhistle, S. et al. (2023). [The Scottish Health Survey 2022 – volume 1: main report](#). Scottish Government.
- <sup>2</sup> Shield, K. D., Parry, C., & Rehm, J. (2014). Chronic diseases and conditions related to alcohol use. *Alcohol Research: Current Reviews*, 35(2), 155.
- <sup>3</sup> Public Health Scotland (2024). [Alcohol Consumption and Harms Dashboard](#).
- <sup>4</sup> In 2020, an estimated 12.2% of female deaths from breast cancer aged 35-64 years and an estimated 47.7% of male deaths from oral cavity and pharynx cancer for those aged 35.64 years were due to alcohol. Taken from Public Health Scotland (2024). [Alcohol Consumption and Harms Dashboard](#).
- <sup>5</sup> Online survey of 12,247 adults aged 18+ in Great Britain, of which 1,021 were in Scotland. Survey conducted 18 February to 18 March 2021 by YouGov on behalf of Action on Smoking and Health. The figures have been weighted and are representative of all GB adults (aged 18+). 23% of people accurately stated that the weekly low risk drinking guideline was 14 units per week; 48% inaccurately estimated the guideline and 29% said they did not know.
- <sup>6</sup> Whitelock, V., (2023) *Cancer Research UK's September 2023 Cancer Awareness Measure 'Plus' (CAM+)*.
- <sup>7</sup> Only 16% of beer drinkers and 20% of wine and spirit drinkers could correctly identify the number of servings of their drink that make up 14 units. Scottish Government (2021). [Count 14 Campaign. Evaluation Report on 2019-20 Activity](#). Scottish Government.
- <sup>8</sup> Online survey of 12,247 adults aged 18+ in Great Britain, of which 1,021 were in Scotland. Survey conducted 18 February to 18 March 2021 by YouGov on behalf of Action on Smoking and Health. The figures have been weighted and are representative of all GB adults (aged 18+). 75% of people did not know or inaccurately estimated the calorie content of a pint of 5% lager, 78% did not know or inaccurately estimated the calorie content of a 175ml glass of 12% wine, and 89% did not know or inaccurately estimated the calorie content of a 25ml measure of 40% ABV spirits. An answer was deemed correct if it was within 50% of the true value.
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- <sup>10</sup> Tobacco Labelling Resource Centre (2013). United Kingdom. *Tobacco Labelling Resource Centre*. <https://tobaccolabels.ca/countries/united-kingdom/>
- <sup>11</sup> Hammond, D. (2011) Health warning messages on tobacco products: a review. *Tobacco Control*, 20(5), pp.327-337.
- <sup>12</sup> Noar, S. M. et al (2016). The impact of strengthening cigarette pack warnings: systematic review of longitudinal observational studies. *Social Sciences and Medicine*, 164, 118–129
- <sup>13</sup> Dimova, E. & Mitchell, D. (2020). [Rapid literature review on the impact of health messaging and product information on packaging of alcohol and other unhealthy commodities](#). Alcohol Focus Scotland.
- <sup>14</sup> Hobin, E. et al. (2022). [Enhanced Alcohol Container Labels: A Systematic Review](#). Canadian Centre on Substance Use and Addiction.
- <sup>15</sup> Schoueri-Mychasiw, N. et al. (2020). Examining the impact of alcohol labels on awareness and knowledge of national drinking guidelines: A real-world study in Yukon, Canada. *Journal of Studies on Alcohol and Drugs*, 81(2), 262-272.
- <sup>16</sup> Hobin, E. et al. (2020). Testing alcohol labels as a tool to communicate cancer risk to drinkers: A real-world quasi-experimental study. *Journal of Studies on Alcohol and Drugs*, 81(2), 249-261.
- <sup>17</sup> Zhao, J. et al. (2020). The effects of alcohol warning labels on population alcohol consumption: an interrupted time series analysis of alcohol sales in Yukon, Canada. *Journal of Studies on Alcohol and Drugs*, 81(2), 225-237.
- <sup>18</sup> Food Standards Agency (31 December 2020). Packaging and labelling. *Food Standards Agency*. <https://www.food.gov.uk/business-guidance/packaging-and-labelling>
- <sup>19</sup> Portman Group (2017). [Communicating alcohol and health-related information](#). Portman Group.
- <sup>20</sup> Lim, A. W. et al (2019). Pregnancy, fertility, breastfeeding, and alcohol consumption: An analysis of framing and completeness of information disseminated by alcohol industry– funded organizations. *Journal of Studies on Alcohol and Drugs*, 80(5), 524-533.
- <sup>21</sup> Petticrew, M. et al (2018). How alcohol industry organisations mislead the public about alcohol and cancer. *Drug and alcohol review*, 37(3), 293-303.
- <sup>22</sup> Smith, S. W. et al (2006). Are "drink responsibly" alcohol campaigns strategically ambiguous? *Health Communication*, 20(1), 1-11
- <sup>23</sup> Maani Hessari, N., & Petticrew, M. (2018). What does the alcohol industry mean by 'Responsible drinking'? A comparative analysis. *Journal of Public Health*, 40(1), 90-97.
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- <sup>25</sup> Petticrew, M. et al (2016). Health information on alcoholic beverage containers: has the alcohol industry's pledge in England to improve labelling been met? *Addiction*, 111(1), 51-55.
- <sup>26</sup> Online survey of 1,126 adults aged 18+ in Scotland conducted 29 February to 18 March 2024 by YouGov on behalf of Action on Smoking and Health. The figures have been weighted and are representative of all adults in Scotland (aged 18+).
- <sup>27</sup> Jones, D. et al. (2021). Health information, messaging and warnings on alcohol packaging: a focus group study with young adult drinkers in Scotland. *Addiction Research & Theory*, 29(6), 469-478.
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