

Our Right to Know

How Alcohol Labelling is
Failing Consumers



alcohol
health alliance uk

Our Right to Know

- ▶ **People have the right to know about the harms associated with alcohol, so they can make informed choices about their drinking.**
- ▶ **During August and September 2018, the Alcohol Health Alliance UK reviewed 320 alcohol product labels across 12 UK locations to see what health information they provide.**
- ▶ **We found very little information being provided to consumers. Only 24 labels out of 320 informed consumers of the Chief Medical Officers' (CMOs) low-risk weekly guideline of 14 units, more than two and a half years after the guideline took effect.**
- ▶ **Our research shows it is time that we move away from industry self-regulation of alcohol product labelling. Instead, we need mandatory labelling of all products to ensure they convey the information the public is entitled to.**

Why is alcohol labelling important?

People should be supported to make informed choices about their alcohol consumption and they have a right to know the risks associated with drinking. Providing information via labels is a key means for people to access health information and advice at the point when they are choosing whether and what to purchase. This is important because:

Alcohol is linked to health risks, including cancer:

Alcohol is linked to over 200 different kinds of disease and injury, including liver disease, heart disease and 7 different types of cancer.^{1,2}

Alcohol is the leading risk factor for death for 15-49 year olds in the UK,³ and causes over 1 million alcohol-related hospital admissions in the UK each year.⁴ Responding to and treating preventable alcohol-related diseases represents a high burden to the NHS: it has been estimated to cost the NHS £3.5 billion each year.⁵

Most people are unaware of the health risks of alcohol:

In the UK, only 1 in 10 are aware of the health link between alcohol and cancer.⁶ Additionally, more than 80% failed to correctly identify the low-risk drinking guidelines, published by the Chief Medical Officers, that recommend drinking no more than 14 units a week.⁷

Labelling increases awareness of harms related to drinking:

International evidence suggests that clear labelling of alcohol containers can increase awareness of health messages^{8,9,10} and may help consumers to make healthier choices.⁸ However, this relies on labels being clearly legible and understandable.^{8,9}

Labelling information is frequently missing or out-of-date

To find out what information is currently stated on labels, AHA members surveyed products across seven major supermarkets¹¹ in England, Wales and Scotland. The products included beers, ciders, spirits, liqueurs, wines including sparkling wines and champagne, ready-to-drink products and alcopops. We reviewed brands owned by multi-national drinks companies as well as supermarket own brands and small, independent breweries and distilleries. In total, 320 different products were reviewed across 12 locations.

In reviewing the labels we checked whether they included the following CMOs' drinking guidelines:

- ▶ Advice to stay within the low-risk weekly guideline of 14 units (for both men and women)
 - ▶ Advice to spread out drinking across the week
 - ▶ Health warnings of specific conditions like cancer, heart disease or liver disease
 - ▶ Advice to have days without having a drink
 - ▶ Advice that it is safest not to drink when pregnant or trying to become pregnant.
- We found that the vast majority of current alcohol labels were failing to communicate the alcohol guidelines and the harms associated with alcohol. Our key findings were:
- ▶ More than two and a half years after the current CMO alcohol guidelines took effect (8 January 2016), only 7.5% (24) of the 320 products reviewed informed customers of the CMOs' weekly guideline of 14 units.
 - ▶ Most of these 24 products were supermarket own brand wines and spirits, or from smaller independent producers.
 - ▶ Two thirds of products (211) referred to the out-of-date daily or weekly unit limits. This included products which were launched after the publication of the current guidelines.¹²
 - ▶ Five products informed UK consumers of the Republic of Ireland unit guidelines.
 - ▶ A quarter of products (80) carried no information at all on drinking guidelines.
 - ▶ No products advised consumers to spread their drinking across the week, or have drink-free days.
 - ▶ No products contained health warnings of specific illnesses or diseases.
 - ▶ 284 of the products included the 'no drinking in pregnancy' logo, but many of them were small and difficult to see. Nine products (2.8%) carried the fuller information on not drinking while pregnant or if trying to conceive.

A number of producers now seem to be signposting to other sources of information instead of providing guidelines on products themselves, for example stating “For further health information visit drinkaware.co.uk”.

Whilst pregnancy warnings were voluntarily displayed on the majority of products, many of them were small and difficult to see. This reinforces other research that found that around four fifths of health warnings appear on the back label, and 60% used a font smaller than recommended for legibility.¹³ Such unclear presentation has been noted to limit the effectiveness of these warnings. Pregnancy labels have also been found to be significantly smaller on wine than beer, despite the fact that women consume wine more regularly.¹³

Self-regulation is failing consumers

Alcohol labelling in the UK is currently self-regulated by the industry-funded Portman Group.^{14,15} Under the current system of self-regulation there are few requirements for what should appear on alcohol product labels; alcohol producers decide what to include. The only mandatory requirement under EU law is that labels display alcohol by volume (ABV).¹⁶ As shown in **Table 1** at the end of this document, the provision of other health information – such as pregnancy warnings, information about content in units, and references to the CMOs’ low risk guidelines – is covered only by the Portman Group’s self-regulatory, voluntary codes. As such, the inclusion of health warnings is entirely optional.

In 2011, the Department of Health worked with the industry to establish the Responsibility Deal Alcohol Network Labelling Pledge under which industry partners gave a commitment that they would “ensure that over 80% of products on shelf (by December 2013) will have labels with clear unit content, NHS guidelines and a warning about drinking when pregnant”.¹⁷ An audit in

2014, however, found that only 47% of labels adhered to industry’s own best-practice standards, meaning that the three required elements were present, displayed clearly and legibly, and grouped together in an appropriate field of vision.¹⁸ A subsequent review of alcohol policy by Public Health England concluded that voluntary codes were largely “ineffective”.¹⁹

In March 2017, working closely with industry, the Department of Health published recommendations about communicating the updated CMOs’ low-risk drinking guidelines on labels.²⁰ The UK Government subsequently stated that it would work with industry partners on promoting dissemination of the guidelines.²¹ To date government has not taken forward the recommendation of the Guidelines Development Group to the UK Chief Medical Officers that it run social marketing campaigns for the public and that health warnings appear on all alcohol products.²²

In September 2017, the Portman Group updated their best practice for drinks producers on communicating alcohol and health-related information to consumers. Significantly, the Portman Group removed the CMOs’ guidelines as a required element of alcohol product labelling.²³ This may explain the emergence of labels which only provide minimal information – usually the pregnancy logo – with the reference: “For further health information visit drinkaware.co.uk”.

Using labels to direct consumers to further health information online – such as that on the Drinkaware website – is widely thought to be of limited utility compared to presenting information on the label itself, due to the conscious and proactive decision needed by each individual to access this information. An Australian survey found that only 7% of respondents followed the address on the label to their national equivalent of the Drinkaware site.²⁴

Evidence shows that under a voluntary system few labels contain clear health information. The current system of self-regulation is clearly failing consumers.

This failure is counter to the Chief Medical Officers' principles that:

- ▶ People have a right to accurate information and clear advice about alcohol and its health risks.
- ▶ Government has a responsibility to ensure this information is provided for the public in a clear and open way, so they can make informed choices.

The future of labelling: policy change is feasible and popular

Consumer information on alcohol products is inadequate and inconsistent due to an ineffective self-regulatory system. Action to compel alcohol producers to provide appropriate information on their products is both necessary and possible.

The public demands change:

A European consumer survey found that 81% of UK participants felt that alcohol labels do not provide sufficient health related information.²⁵ Moreover, a survey by the Alcohol Health Alliance in 2017 showed that 78% of the public support mandatory health warnings on alcohol product labels.⁷

Support for the display of specific health warnings is also high: Cancer Research UK found that fewer than 10% of people surveyed oppose or strongly oppose the idea that alcohol labels should contain warnings that alcohol increases the risk of cancer.⁶ Demand for explicit health warnings, such as those about cancer, drink driving, and drinking in pregnancy, was particularly high amongst younger and more socioeconomically deprived drinkers.⁸

The Royal Society for Public Health (RSPH) further found that 67% of people

supported the addition of energy (calorie) information to alcohol labels.²⁶ Focus group participants felt this was particularly important due to a lack of awareness surrounding calories in alcoholic beverages. About 80% of adults in the UK do not know or underestimate the calorie content of a large glass of wine.²⁶

There is legal scope for policy change:

EU law requires alcohol labels to provide information on strength in alcohol by volume (ABV).¹⁶ However, regulations that apply to other food and drinks – including alcohol-free drinks – to provide labelling information on energy and nutritional content, and specific requirements on how this should be presented, do not apply to alcohol (as displayed in **Table 1**).

Nonetheless, EU law permits member states to implement additional national specific regulations to protect public health and consumers,¹⁶ with the proviso that these regulations adhere to international trade law.²⁷ This clause has been successfully used in France to introduce mandatory pregnancy warnings.⁸ The Republic of Ireland is also planning to introduce specific health warnings about cancers, as part of the Public Health (Alcohol) Bill.^{28,29}

Furthermore, the UK's exit from the EU in 2019 may provide scope for change.³⁰

What should be on labels?

To ensure that consumers are given the right information to help them make informed choices about what and whether they choose to drink, the government should introduce mandatory labelling. Labels should include, in a prescribed size and layout:

- ▶ The CMOs' recommendation about the 14-unit weekly low-risk guidance;
- ▶ A prominent, evidence-based health warning, developed by independent experts (rotated);

- ▶ Over 18, no drinking during pregnancy and no drinking and driving warnings; and
- ▶ The units provided in a typical serving and the whole container.

Ingredient, nutritional, calorie and alcohol content labelling is currently controlled at EU level, however, government should also require this to be provided, if and when it has the powers to do so post-Brexit.

The RSPH published mock-ups of possible labels in its report earlier this year.⁸ Examples of these are displayed here.

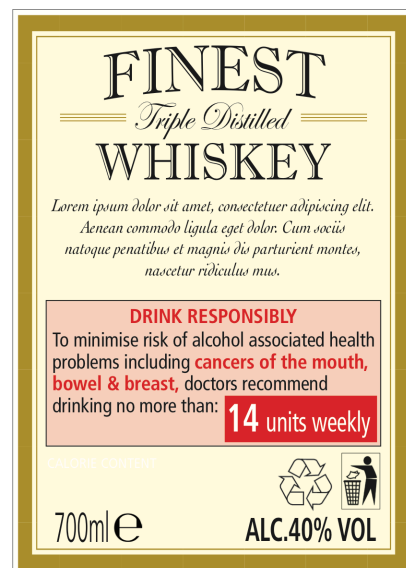


Figure 1. RSPH mock-ups for alcohol labels (beer, spirit and wine examples).

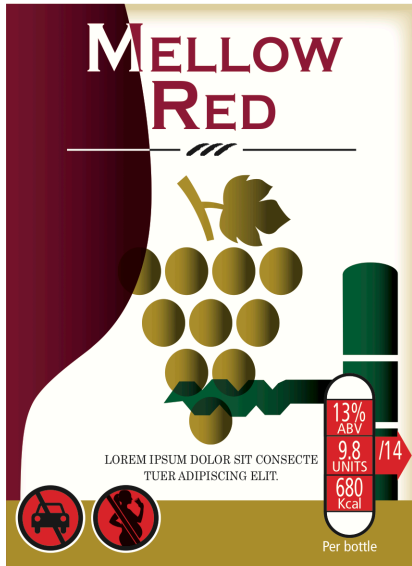


Table 1: How Current Regulation of Alcohol Labelling Fails to Protect Consumers

Measure	Regulation	Status
Alcohol by Volume (ABV)	Mandatory Regulation (EU) No. 1169/2011	Compliance satisfactory.
Common allergens (Sulphites, Egg, Milk)	Mandatory in specific wine products only/self-regulatory Regulation (EU) No. 579/2012	Not discussed by Portman Group
Unit content (per product/ per serve)	Self-regulatory The Portman Group, 'Communicating Alcohol and Health-Related Information' ²³	Per container units recommended as minimum by the Portman Group. Per typical serve listed "optional"
Pregnancy warning or logo	Self-regulatory The Portman Group, 'Communicating Alcohol and Health-Related Information' ²³	Recommended as a minimum by the Portman Group. No minimum size for font/logo discussed.
CMOs' guideline not to regularly drink more than 14 units per week	Self-regulatory The Portman Group, 'Communicating Alcohol and Health-Related Information' ²³	Not specifically recommended: "Companies choosing to replace the previous guidelines should do so with the following text: 'The UK Chief Medical Officers recommend adults do not regularly drink more than 14 units per week.'"
CMOs' guideline to spread drinking evenly (rather than 'bingeing')	Self-regulatory The Portman Group, 'Communicating Alcohol and Health-Related Information' ²³	Not specifically recommended: "Companies choosing to replace the previous guidelines should do so with the following text: 'The UK Chief Medical Officers recommend adults do not regularly drink more than 14 units per week.'"
CMOs' guideline to have several drink-free days a week	Self-regulatory The Portman Group, 'Communicating Alcohol and Health-Related Information' ²³	Not discussed by the Portman Group

<p>Health warnings e.g. cancer (CMOs' guideline that the risk of developing a range of health problems including cancer increases the more you drink on a regular basis)</p>	<p>Possible under EU Law/Self-regulatory</p> <p>Regulation (EU) No. 1169/2011; The Portman Group, 'Communicating Alcohol and Health-Related Information'²³</p>	<p>Not discussed by the Portman Group</p>
<p>Nutritional information e.g. calories</p>	<p>Self-regulatory</p> <p>Can be provided on a voluntary basis but cannot be required by the Government</p> <p>Regulation (EU) No. 1169/2011;</p> <p>The Portman Group, 'Communicating Alcohol and Health-Related Information'²³</p>	<p>Neither recommended nor discouraged by the Portman Group: "Some alcohol producers already provide calorie content either on the packaging or via an online platform".</p>
<p>Ingredients</p>	<p>Self-regulatory</p> <p>Can be provided on a voluntary basis but cannot be required by the Government</p> <p>Regulation (EU) No. 1169/2011;</p> <p>The Portman Group, 'Communicating Alcohol and Health-Related Information'²³</p>	<p>Not mentioned by the Portman Group</p>
<p>Drink-driving message</p>	<p>Self-regulatory</p> <p>The Portman Group, 'Communicating Alcohol and Health-Related Information'²³</p>	<p>The Portman Group considers this to be optional: "The container may include a 'don't drink and drive' logo or... statement to that effect".</p>
<p>Age-restricted product label</p>	<p>Self-regulatory</p> <p>The Portman Group, 'Communicating Alcohol and Health-Related Information'²³</p>	<p>The Portman Group considers this to be optional: "The container may include the logo to highlight that alcohol is an age-restricted product".</p>

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