



## Factsheet – Health warning labels on alcoholic beverages

### 1. Background

Alcoholic beverages are common consumer goods sold and consumed across Europe. Europe is the region with the heaviest alcohol consumption in the world (11 litres of pure alcohol per person per year).

Alcohol (ethyl alcohol, ethanol) can cause a wide range of diseases as well as acute and chronic disorders. 7.4% of all ill-health and early deaths in the European Union (EU) are linked to alcohol. The direct costs from dealing with the consequences of harmful alcohol consumption are estimated to reach €125 billion per year (Anderson & Baumberg, 2006).

Alcohol is therefore not an ordinary commodity but an important health determinant. Adequate information needs to be provided to consumers about the health consequences of alcohol consumption, so that they can take precautions to lessen the risk of harm. As part of broader health policies to reduce alcohol related harm, health messages on the labels of alcoholic beverages can be an effective measure to raise awareness of the risks that may be involved in alcohol consumption.

- 10,800 deaths per year due to road traffic accidents (1 in 3 of road traffic fatalities)
- 2,000 homicides (4 in 10 of all murders)
- 10,000 suicides (1 in 6 of all suicides)
- 45,000 deaths from liver cirrhosis
- 50,000 cancer deaths, of which 11,000 are female breast cancer
- 17,000 deaths due to neuropsychiatric conditions
- Some 5 million children are born with birth defects and developmental disorders because of their mother drinking during pregnancy

**Table 1: Harm done by alcohol consumption in Europe (Anderson & Baumberg, 2006)**

### 2. EU strategy on alcohol highlights the need to inform consumers

An EU strategy on alcohol was launched in 2006 in order to support Member States in reducing alcohol-related harm (European Commission, 2006). Informing, educating and raising awareness on the impact of harmful and hazardous alcohol consumption was identified as one priority theme for action in the Strategy.

The rationale given was that:

"Citizens have the right to obtain relevant information on the health impact, and in particular on the risks and consequences related to harmful and hazardous consumption of alcohol, and to obtain more detailed information on added ingredients that may be harmful to the health of certain groups of consumers."

Hazardous alcohol consumption has been defined as a level of consumption or pattern of drinking that is likely to result in harm should present drinking habits persist (Babor *et al*, 1994). However, there is no standardized agreement on the level of alcohol consumption that should be regarded as hazardous drinking. Harmful drinking is defined as "a pattern of drinking that causes damage to health, either physical (such as liver cirrhosis) or mental (such as depression secondary to alcohol consumption)" (World Health Organisation, 1992).

### 3. EU regulation on labeling of alcoholic beverages

Labelling of food is governed by EU Directive 2000/13/EC<sup>1</sup> (European Union, 2007). Information such as product name, list of ingredients, quantity of certain ingredients, net quantity, minimum durability... is required on the food package.

Below is a list of information required by EU legislation to be given on all foodstuffs and drinks, including alcoholic beverages. There is in addition a range of regulations pertaining to the labelling of wine, beer or spirits specifically. These regulations govern the naming of alcoholic beverages as well as information given for example on types of grapes used in the production or on the geographical origins of the product.

<b>Mandatory for all:</b>
<ul style="list-style-type: none"><li>- <b>Product name</b></li><li>- <b>Beverage category</b></li><li>- <b>Quantity: L, cl, ml</b></li><li>- <b>Strenght: % ABV</b></li><li>- <b>Contact info</b></li><li>- <b>Code or batch</b></li><li>- <b>Place of origin</b></li><li>- <b>Certain specific ingredients</b></li></ul>
<b>Mandatory for some:</b>
<ul style="list-style-type: none"><li>- <b>Minimum durability</b></li><li>- <b>Allergens</b></li></ul>

**Table 2. Mandatory information required by the EU on alcoholic beverages**

EU legislation also requires foodstuffs and soft drinks to be provided with a list of ingredients as well as information on their nutrient content. Alcoholic beverages, defined as beverages containing more than 1,2 % alcohol by volume (ABV), are however exempted from this obligation. As a result, consumers cannot find on alcoholic beverage labels indication of their calorie content for example, but have to seek such information elsewhere.

There is no EU legislation to require warnings about health risks to be put on alcoholic beverage labels. If EU Member States choose to require alcoholic beverages to carry mandatory health messages, they need

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<sup>1</sup> This directive was revamped into a new regulation, voted by the European Parliament on July 6<sup>th</sup> and which should be adopted by the Council at the beginning of October 2011. In this new Directive, beverages containing more than 1.2 % by volume of alcohol have been once again exempted from the obligation to list its ingredients and provide nutrition information. The Regulation invites however the European Commission to analyse further the situation and produce a report within 3 years of its entry into force. This report should "explain the reasons justifying possible exemptions, taking into account the need to ensure coherence with other relevant Union policies".

to notify the Commission and other Member States of their plans, which will be scrutinised on a case-by-case basis to ensure that the free movement of goods is not unduly disturbed.

### **National regulations to require health messages on alcoholic beverages**

Three different approaches – two from EU Member States – to use mandatory health messages on alcoholic beverages to inform and raise awareness about risks are described below (European Commission 2009, EURO CARE 2009).

#### **France**

France has enacted a law (French Government, 2006), which entered into force in 2007, that requires all alcoholic beverages sold in France to carry a warning about the risk of damaging the foetus by drinking alcohol during pregnancy.

The warning may be presented as a pictogram (figure 1) or as a text: *“Consumption of alcoholic beverages during pregnancy, even in small amounts, may have serious consequences on child’s health”*. Producers tend to only use the pictogram.

Some alcohol producers and retailers have chosen to voluntarily place the French warning pictogram also on products sold in other EU countries. There is currently no information available on the share of alcoholic beverage packages carrying the warning outside France.



**Figure 1. The French warning pictogram**

#### **Germany**

In Germany, spirits-based ready-to-drink mixtures – "alcopops" – are defined by law as spirits-drinks which means that the minimum age applied is 18 years (rather than 16 years as for beer and wine). A clause in the Protection of Minors Act., introduced in 2004, requires "alcopops" to carry the message: *“Not for supply to persons less than 18 years old”* (clause 9, Protection of Minors Act).

The mandatory text has to be placed on the front side of the bottle. The text must be written in the same font size as the brand name. In parallel to the introduction of this law, a special tax on spirits-based alcopops was implemented with the purpose of making these drinks less accessible for young people (German government, 2004).

#### **Russian Federation**

In Russia, health warnings on wine and spirits, including the Russian staple drink vodka, are required by law. The following warning is mandatory: *“Alcohol is not for children and teenagers up to age 18, pregnant and nursing women, or for persons with diseases of the central nervous system, kidneys, liver and other digestive organs”*.

## **4. Voluntary labelling practices of alcohol manufacturers**

Following the 2006 EU Strategy on Alcohol, some alcoholic beverage manufacturers have begun to introduce different logos and messages relating to health risks or messages to promote "responsible" or "moderate" drinking on their products sold in EU countries.



**Figure 2. Voluntary warning and responsible drinking message**

### ***United Kingdom***

In the United Kingdom, the alcohol industry entered into agreement with the Government in 2007 to voluntarily place on all alcoholic beverage containers sold in the UK the following information:

- Alcohol content in standard units. One unit is equivalent to 10 ml or 8 grams of pure alcohol. Used since the 90's, the standard unit concept was designed to help consumers calculate their alcohol intake and keep their consumption below the recommended limits.
- Lower-risk drinking guidelines: *"UK Chief Medical Officers recommend men do not regularly exceed 3-4 units daily and women 2-3 units daily"*.
- Website address of the Drinkaware Trust: [www.drinkaware.co.uk](http://www.drinkaware.co.uk).
- One of the following messages as a heading: *"Know Your Limits"*, *"Enjoy Responsibly"*, *"Drink Responsibly"*.
- Warning about pregnancy-related risks: *"Avoid alcohol if pregnant or trying to conceive"*.



**Figure 3. UK example of labelling alcoholic beverages with health information**

## **5. Impact and effectiveness**

The impact of health warning labels on *drinking behaviour* is shown to be insignificant in many studies (Grube & Nygaard, 2001; Agostinelli & Grube, 2002). However, many studies show a greater *awareness* among the consumers of the risks highlighted in the warnings (Stockwell 2006).

Warnings on tobacco packages were shown to be more effective. They have the potential to strongly influence the decision making process to quit smoking (Wilkenson & Room, 2009; Willemsen, 2005). The greater effectiveness of the tobacco health warnings could be explained by several factors:

- The size and the positioning of the message labels are clearly specified in the Directive. This avoids minimizing and misplacing the messages. In addition, it requires short and easy to understand messages.
- The messages are different and rotating, covering the most harmful health impacts of smoking (European Union, 2001).

Different target groups such as teenagers (McKinnon *et al.*, 2000) and pregnant women were examined in different studies conducted in the US and in Europe. Evidence of awareness and recall of the messages was found among these target groups (Hankin *et al.*, 1993; Guillemont & Léon, 2008). Telephone surveys conducted in 2004 (before the implementation of the French warning label) and in 2007 (after the introduction) showed that this label increased risk awareness. Additionally, the social norms supporting abstinence during pregnancy increased (Guillemont & Léon, 2008).

In Germany, one study conducted by the Federal Institute for Health Education looked at the effect of the age limit label on alcopops. It showed that 17% of the 12-17 years old alcohol consumers renounced to buy alcopops due to this label (BZgA, 2005).

In Australia, alcohol standard unit labelling (1 unit = 10g pure alcohol) of alcoholic beverages became mandatory in 1995. Tracking research found evidence of increasing awareness of the concept of “standard drink” since the introduction of the labels (Loxley *et al.*, 2004). A recent study confirmed these results. However, the researchers found out that the standard drink label helps young people to choose the strongest drinks at the lowest cost (Jones & Gregory, 2009).

In the UK, the 2007 self-regulation agreement was studied by the Campden and Chorleywood Food Research Association (CCFRA). Results showed that most of the manufacturers did not follow the agreed format and content of the labels. Only 2.4% of the samples carried the Chief Medical Officers (CMO) lower risk guidelines in the agreed format (CCFRA, 2008). ‘Alcohol Concern’ (UK national agency on alcohol misuse) conducted a survey on labelling of alcoholic beverages in the UK. The results are worrying and show the limited interest of a considerable number of producers on this issue (Alcohol Concern, 2009). Until now, there is no research available investigating the impact of such labels on drinking behaviour in the UK.

## **6. Effective design and placement**

The design and positioning of health warning labels is fundamental in order for them to be effective. In the US, a series of experiments were conducted to analyse the factors affecting the perception as well as the noticeability of warning labels (Laughery *et al.*, 1993). The results of these experiments stressed the following key features:

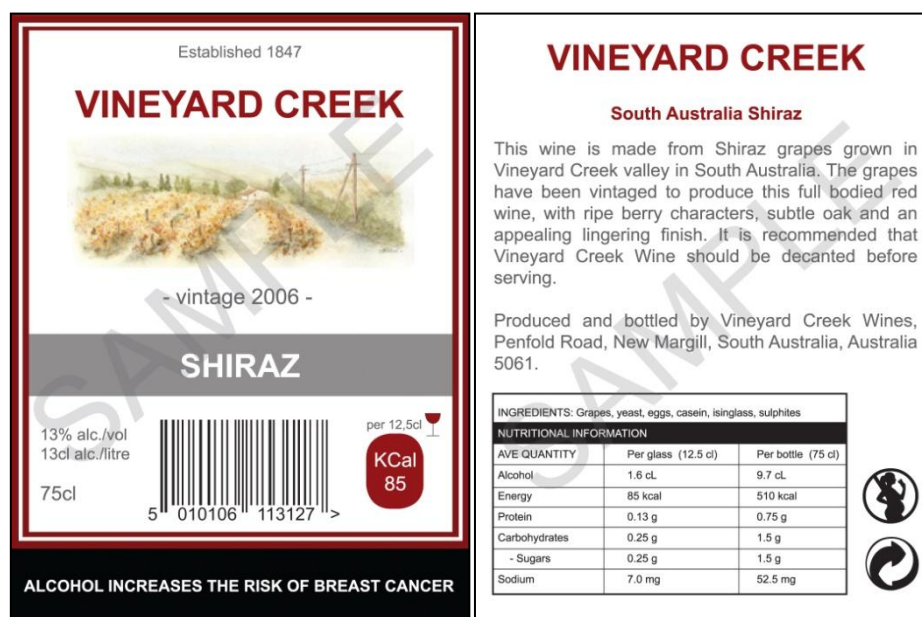
- Label clutter: warning labels should not be obscured by surrounding information.
- Location: warnings on the front of alcohol containers are more noticeable than in any other place.
- Orientation: horizontal placement increases noticeability.
- Contrast: a strong foreground-background contrast is more effective in drawing attention.
- Colour: the specific colour used is less important than the colour combination.
- Pictorials attract attention. If paired with written warnings, they may be better remembered.
- Signal icons: a red triangle for instance helps to identify warning-related information.
- Text such as “Government warning” functioned as a signal helping to identify the warning. Texts with a shorter signal (such as “warning” as a single word) are less noticeable.
- Border: the area should be large enough to ensure that the text could be read.
- A combination of salience features is likely to improve noticeability, more than using a single feature.



In Australia, an on-going qualitative study is conducted by the Victorian Health Promotion Foundation (VicHealth, 2009). The following most relevant results were found:

- At the beginning, health warnings should be factual and informative.
- Labels most likely to be effective are those linked with existing media campaigns.
- If images are included, they would be more effective if they are linked with other elements of a social marketing campaign.
- Messages should not tell the consumers what to do. Participants who had personal bad experiences in relation with their drinking behaviour are especially reluctant to these types of messages.
- “Health Warning” was the most preferred wording.

A series of qualitative studies was conducted with youngsters from 6 different EU countries in the framework of the Protect project (CRIOC, 2011). Results showed that if health warning labels were to be used, young people were more receptive toward a combination of pictures and informative texts such as “Alcohol increases the risk of breast cancer”. A mock-up label was developed in the scope of this project (see figure 4). This label provides product information as well as a rotating health warning message, fulfilling the above described criteria for effectiveness.



**Figure 4. Mock label (front and back) for wine**

## 7. Questions and answers

### ➤ What is the advantage of health information and warnings on alcoholic beverages?

Giving information on the package is an effective way to reach nearly all consumers – with the exception of those who only consume drinks served in glasses in alcohol-serving establishments. It is much cheaper to use product labels to convey health information than for example to carry out mass media campaigns. Clear rules – preferably legislation – are needed to make sure that the information is to the point and adequately visible on the package.

### ➤ Should it be left to the producers to choose what information to provide on the labels?

Experience shows that producers – including alcohol manufacturers - avoid giving such information on product labels that could damage the product's image. As there are no compelling rules regarding adequate size, for example the French pregnancy warning pictogram is mostly used in a

miniature size which makes it hard to notice and reduces potential for impact. Instead of giving clear information about health risks, alcohol manufacturers prefer to use "positive" messages such as "drink responsibly" or "enjoy in moderation". Especially when combined with the brand name, such messages turn into a marketing slogan (see example figure 5 below).



**Figure 5. Example of industry's voluntary label.**

➤ **Is it a great burden for alcohol producers to place mandatory health information or warnings on their products?**

Product labels are an important marketing tool which contributes to the image of the product. Manufacturers may therefore frequently change the outlook of product labels, for example to take into account specific seasons or festivities. Accommodating mandatory health information on alcoholic product labels would thus be fairly easy, for example in conjunction with a change that would occur anyway. For smaller manufacturers, the implementation could be delayed to take into account their normal cycle of using up printed labels in stock.

➤ **Are health messages and warnings on alcoholic beverage labels sufficient to inform consumers?**

Product labels are just one – albeit cheap and potentially effective – way to inform consumers. As always in communication campaigns, the more channels you use to convey your message, the more likely you are to reach target groups and strengthen the message through repetition. The French experience of raising awareness about the risks of alcohol during pregnancy shows that a health warning on alcoholic beverage labels can be strengthened by a broader communication campaign utilizing the mass media. Possibilities to amplify health messages on alcoholic beverages include placing similar messages on alcohol advertisements and displaying similar messages in shops, bars and pubs.

➤ **What does the public say?**

Three quarters of EU citizens (77%) would agree with putting warnings on alcohol bottles (79%) and adverts (82%) to warn pregnant women and drivers of the dangers of drinking alcohol. Opposition to such warnings on alcoholic beverages is not common, with the exception of a handful countries where one third or more would be against (the Netherlands 40%, Denmark 38%, Finland 35%, Germany 35%, Slovenia 33%) (Eurobarometer, 2010).

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