Ms Ursula von der Leyen, European Commission President  
Mr Frans Timmermans, Executive Vice-President of the European Commission for the ‘European Green Deal’  
Ms Stella Kyriakides, European Commissioner for Health and Food Safety  
Mr Janusz Wojciechowski, European Commissioner for Agriculture Brussels  
Mr Thierry Breton, European Commissioner for Internal Market  
Mr Didier Reynders, European Commissioner for Justice  
Mr Virginijus Sinkevičius, European Commissioner for Environment, Ocean and Fisheries  
Ms Margrethe Vestager, Executive Vice-President of the European Commission for ‘A Europe fit for the Digital Age’  
Mr Rytis Martikonis, Chair, Regulatory Scrutiny Board  
Ms Claire Bury, Deputy Director General for Food Sustainability Responsible for Directorates E, F and G (SANTE.DDG2)  
Mr John Ryan, Deputy Director General for health responsible for Directorates B, C and D (Sante B)

19 May 2023

Subject: Civil society alliance calls for labelling solutions which respond to European citizens’ right to information: ON label

Dear Ms von der Leyen,  
Dear Executive Vice-Presidents, Commissioners, Chair of the Regulatory Scrutiny Board, Deputy Director Generals,

We, the undersigned civil society representing a large number of public health organisations, medical and scientific societies, and patient groups, would like to reiterate our position regarding the legislative proposal on alcohol labelling, as part of the revision of the Food Information to Consumers (FIC) EU Regulation No 1169/2011.

Our understanding is that the impact assessment supporting the revision of the food labelling rules under FIC, which includes labelling of alcohol beverages, is not finalised. Our fear is that the data gathering exercise as part of preparation for the proposal, including the impact assessment, is unduly influenced by commercial operators. We are very concerned that this important legislation will not see the light of day before the end of the current mandate. This would be a missed opportunity to ensure that consumer needs are properly taken into consideration and to make a positive impact on European citizens’ right to information and public health protection. On this occasion, we would also like to express our concern with the delay of this proposal which, according to the Beating Cancer Plan’s implementation roadmap¹, was expected to be adopted by the end of 2022.

Alcohol is the causal factor for more than 200 diseases and conditions, and it has been classified by the International Agency for Research on Cancer (IARC) as a Group 1 human carcinogen since 1988². In terms of cancer prevention, evidence suggests that there is no amount which can be considered

¹ Europe’s Beating Cancer Plan: Implementation Roadmap, European Commission (2022)  
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6421508/
safe for consumption. In the WHO European Region, half of all alcohol-attributable cancers are actually caused by 'light' to ‘moderate’ patterns of consumption³.

As the name of the FIC regulation itself suggests, the goal of this legislation is to ensure that labelling of food and drinks as well as of alcoholic beverages, is performed in a way that is informative to consumers. As it currently stands, consumers are lacking basic nutrition information about the product they are about to buy and consume. In fact, unlike any other food or drink product, alcoholic beverages containing above 1.2% of alcohol by volume currently lack any information on their labels about their energy value (expressed in kcal/KJ), full nutrition declaration, and list of ingredients. The Commission has already acknowledged the absence of any objective rationale for this exemption in a late report from 2017 to the European Parliament and the Council⁴.

In a Commission consultation on the revision of the FIC regulation in 2022, more than two-thirds of all respondents, including those from groups with an economic interest in opposing labelling, agreed that consumers should be given ingredient and nutrition information for alcoholic beverages⁵. On-label provision of this information was overall the preferred option, with particularly strong support amongst public health NGOs, academia/research institutes as well as consumers organisations, whilst this type of provision was not favoured by economic operators, whose preferred option was off-label. This clearly depicts the polarisation of the debate.

On-label nutrition and ingredient information is the most appropriate and most practical way to respect consumers’ right to know. It ensures that consumers have immediate access to this information (both at the point of purchase and right before consumption), it allows for easier comparison between products, and it requires no additional tools or skills. Results from the 2021 Digital Economy and Society Index (DESI) have shown that 44% of people in the EU lack basic digital skills⁶. Furthermore, not all European citizens own a smartphone. Scanning a QR code also requires access to data connection, and it is subject to good data coverage. Digital labelling has the potential to widen health inequalities even further, only allowing a certain set of the population to access nutrition information.

Finally, the on-label indication of nutrition and ingredient information for alcoholic beverages should not prove difficult to implement, since no and low alternatives (currently defined as alcoholic beverages containing below 1.2% of alcohol by volume) are already mandated to display this information on label. In the food business sector, small and medium-sized enterprises (SMEs) have already been complying with nutrition labelling requirements (energy value, full nutrition declaration, and list of ingredients) since 2016⁷, proving that this can also be achieved by small and medium producers.

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³ Health and cancer risks associated with low levels of alcohol consumption, Anderson et al. (2023), The Lancet, vol. 8, n. 1, E6-E7 https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(22)00317-6/fulltext
We would therefore like to invite the Commission to:

- Respect consumers’ right to information by issuing a proposal for mandatory on-label provision of energy value, full nutrition declaration, and list of ingredients for all alcoholic beverages (wines, beer, and spirits) as soon as possible.
- Ensure that basic nutrition information is available on label for consumers to access easily at all times and without the need of additional tools and skills.

Labelling of alcoholic beverages is an important measure to implement as part of a broader strategy to fight alcohol related harm, alongside other effective policy tools proposed in the European Beating Cancer Plan, the WHO SAFER recommendations\(^8\) and the WHO European Framework for Action on Alcohol 2022-2025\(^9\) which was unanimously adopted by all WHO European Members States at the WHO 72\(^{nd}\) Regional Committee Meeting in Tel Aviv in 2022.

We appreciate you are very busy but hope that you will be free to meet a small delegation from the undersigned in the not too distant future. If you are willing to see us, perhaps through your secretary, we could find a mutually convenient time to meet.

We look forward to your response.

Sincerely,

Florence Berteletti
Eurocare Secretary General

Dr Peter Rice
Eurocare President

Dr Nikhil Gokani
Chair of the Eurocare Alcohol Labelling and Health warnings international expert group (ALHWIN)

Signatories:

- Affinita Antonio, General Manager, MOIGE APS - Movimento Italiano Genitori
- Akka Abousoufiane, Managing Director, Guttempler in Deutschland e. V.
- Amatlier Otger, Coordinator of the Prevention and awareness department, Health and Community Foundation
- Avila Cruz, Executive Director, Alcohol Justice
- Babb Anne, General Secretary, International Blue Cross
- Prof. Bakhturidze George, Founder, Georgian Health Promotion and Education Foundation
- Dr Basset Bernard, President, Addictions France/FFA
- Beekmann Lauri, Executive Director, Nordic alcohol and drug policy network (NordAN)
- Burra Patrizia, Chair, UEG Public Affairs Group
- Prof. Buti Maria, Public Health Councillor, European Association for the Study of the Liver (EASL)

\(^8\) The SAFER Initiative – A world free from alcohol related harm, WHO (2018) https://www.who.int/initiatives/SAFER

- Dr Carter Nigel, CEO, Oral Health Foundation
- Prof. Casswell Sally, Chair, Global Alcohol Policy Alliance
- Cortez-Pinto Helena, President, UEG United European Gastroenterology
- Prof. Cunha Filho Hilson, Chairman of Directorate, CATR - Centre for Advocacy, Treatment and Recovery; Registered Charity
- De Duve Martin, Chief Executive, Univers santé - Groupe porteur "Jeunes, alcool & Société"
- Del Valle Mercedes, Chair Woman, VISUAL TEAF
- Diaz Claudio Founder & President, Associazione Italiana Disordini da Esposizione Fetale ad Alcol e/o Droghe (AIDEFAD- APS/ETS)
- Dr Dongo Dario, President, Égalité association
- Douglas Alison, Chief Executive, Alcohol Focus Scotland
- Eiselé Jean-Luc, CEO, World Heart Federation
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- Dr Maillard Thierry, President, SAF Ocean Indien
- Dr Marin Puig Maria Luisa, Presidenta, Associacio Rauxa
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- Rogelj Peloza Nina, Secretary General, Slovenian NCD Alliance
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- Dr Schaller Katrin, Head of Cancer Prevention Unit (interim), German Cancer Research Center
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- Prof. Tsakos George, Chair, Platform for Better Oral Health in Europe
- Dr Tsereteli Zaza, Board Member, Good Health and Well-being (Georgia)
- van Dalen Wim, Director, Dutch Institute for Alcohol Policy STAP
- Prof. Vanholder Raymond, Chairman, European Chronic Disease Alliance (ECDA)
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- Dr Veryga Aurelijus, Member of the Parliament of the Republic of Lithuania
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- Zupančič Mia, Secretary General, Youth Network No Excuse Slovenia