Position paper  

**Alcohol Labelling**

**Ingredients and nutrition information for alcoholic beverages**

The EU Regulation 1169/2011 on the provision of food information to consumers changed food labelling legislation considerably. Unfortunately, it exempted alcoholic beverages (containing more than 1.2% by volume) from the obligation to provide information to consumers – they do not have to list their ingredients or provide nutritional information.

Consumers have the right to know the ingredients and nutritional values contained in their alcoholic beverages.

The current rules for non-alcoholic beverages should also be used for alcoholic beverages (above 1.2% ABV). This means following Regulation (EU) 1169/2011, listing ingredients and 7 nutritional values per 100 ml. This would help consumers to make meaningful comparisons and utilise the same system they are already used to (for non-alcoholic beverages).

Additionally, as for non-alcoholic beverages, nutritional values may be provided per portion, as long as they represent the real life serving sizes.

To only provide information online, as was suggested by some sectors of the alcohol industry, is insufficient. In a European survey conducted in 2015, only 24.7% of respondents searched online for information regarding ingredients or additives in alcohol.

While appreciating the specificities of small and micro enterprises, Eurocare does not believe that the burden to small producers should exempt an entire sector from the obligation to provide information to consumers. Small and micro producers exist in all sectors of agri-business and they are obliged to comply with Regulation (EU) 1169/2011. There is no justification for a special treatment for alcohol industry.
As part of the Commission-mandated study on the impact of food information on consumers’ decision making, almost half (49%) of the participants wanted information on the energy value of alcoholic drinks\textsuperscript{ii}. In the context of the European Union Joint Action on Reducing Alcohol Related Harm (RARHA) project, a snapshot was gathered of consumers’ perceptions and understanding of communication about alcohol related risks. Consumers appear willing to receive more information on the topic\textsuperscript{iii}.

- 50.4% would like to have more information about ingredient listing
- 43.2% would like to have more information regarding calorie content
- 37.9% would like more information about nutritional value

Listing the ingredients contained in a particular beverage alerts the consumer to the presence of any potentially harmful substances. More importantly, providing nutritional information such as energy content allows consumers to monitor their diets better, and makes it easier to keep a healthy lifestyle.

Commission’s report from March 2017, clearly states that objective grounds have not been identified that would justify the absence of information on ingredients and nutritional information on alcoholic beverages or differentiated treatment for some alcoholic beverages.

Eurocare strongly believes that it is the right of the consumers to be allowed to make informed choices about the products they purchase and that it is the obligation of public institutions to ensure consumers are able to make them.

Bringing alcohol labelling requirements in line with non-alcoholic beverage labelling would allow consumers to make truly informed choices.

About European Alcohol Policy Alliance
Eurocare is an alliance of non-governmental and public health organisations with around 60-member organisations across 24 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in advocacy and research, as well as in the provision of information and training on alcohol issues and the service for people whose lives are affected by alcohol problems.

The mission of Eurocare is to promote policies to prevent and reduce alcohol related harm. The message, in regard to alcohol consumption is “less is better”.

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\textsuperscript{i} Consumer survey on communication of alcohol associated risks. Reducing Alcohol Related Harm (RARHA), 2015, available at \url{www.rarha.eu}
\textsuperscript{ii} TNS European Behaviour Studies Consortium, Study on the impact of food information on consumers’ decision making, 2014.
\textsuperscript{iii} Consumer survey on communication of alcohol associated risks. Reducing Alcohol Related Harm (RARHA), 2015, available at \url{www.rarha.eu}