

What's in this drink?

Eurocare's position on ingredients and nutritional information

2018



The European Alcohol Policy Alliance (EUROCARE)

The 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 for 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 services 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 with regards to alcohol consumption is “less is better”.

Why does Eurocare care about alcohol labels?


Product labels can serve a number of purposes, providing information about the product to the consumer, enticing the consumer to buy the product and alerting consumers to the dangers and health risks from the product.

Due to insufficient labelling, when a consumer drinks an alcoholic beverage, it is almost certain that they do not know what they are drinking.

One of the objectives of public bodies should be to effectively protect people from the risks and threats that they cannot tackle as individuals.

EU Regulation 1169/2011 on the provision of food information to consumers has made considerable changes to the food labelling legislation, demanding that all foodstuffs display ingredients and nutritional values on their packaging.

Unfortunately, it has exempted alcoholic beverages (containing more than 1,2% by volume) from the obligation to provide information to consumers - listing its ingredients and providing nutritional information.



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

Providing full information about the product enables consumers to make informed choices and ensures that consumers know what is in the product they are spending their money on.

The asymmetric relationship between the producers and purchasers of alcohol calls for enhanced consumer protection.

EUROCARE POSITION - ALIGNMENT WITH EU REG 1169/2011

Eurocare is convinced that bringing alcohol packaging in line with non-alcoholic beverages would enhance consumer choice. European Union Institutions are perfectly positioned to coordinate common efforts to inform consumers of the composition of alcoholic beverages.


Consumers would welcome more information on the bottle regarding potential substances with allergenic effects, composition and the amount of calories and sugar contained in their drinks.

Consumers will have the ability to exercise greater choice, they might start to seek out alcohol with fewer calories, or they might not. But at least they will have the choice.

Eurocare is strongly convinced that the consumer has a right to make informed choices about the products they purchase, and it is the obligation of public institutions to enable them to exercise this right.

To ensure market coherence and not place some producers at competitive disadvantage, labelling rules should apply to the whole food industry.

Allowing the alcohol industry not to provide full information on the labels of their products is yet another missed opportunity.



Eurocare calls on the European and national decision and policy makers to work towards alignment of alcoholic beverages with Reg (EU) 1169/2011.

Ingredients and nutritional information listing

There are obvious health reasons why labels should include nutritional information. Being high in sugar, alcohol contains a considerable number of calories, with an energy content of 7.1 kilocalories per gram – only fat has a higher energy value per gram (9kcal/g). Additionally, many types of alcoholic beverages have extra added sugar which contributes to the total calorie content.

Studies in the UK have shown that alcohol accounts for nearly 10% of the calorie intake amongst adults who drink.¹ Therefore, daily energy intake may rise considerably when alcohol is consumed.²

Not surprisingly there are clear associations between alcohol and obesity, although these are also heavily influenced by lifestyle, genetic and social factors.³

1 Bates B, Alison Lennox in Obesity and alcohol; an overview (2012) National Obesity Observatory, NHS

2 Dennis EA, Flack KD, Davy BM. (2009) Beverage consumption and adult weight management: A review. Eating Behaviors; 10(4):237

3 Ibid.



An average glass of beer (330ml), 5% alcohol, has around 142 calories



An average glass of red wine (125ml), 13% alcohol, has around 114 calories



An average drink of vodka (25ml), 40% alcohol, has around 61 calories⁴

Expressed by 100ml, as required by Reg (EU) 1169/2011:

	Vol	Portion size	Calorie values	Per 100ml
Beer	5%	330ml	142 kcal	43 kcal
Wine	13%	125ml	114 kcal	91 kcal
Spirits	40%	25ml	61 kcal	244 kcal

Unfortunately, limited research has been done in the area of alcohol and nutrition (obesity). Nevertheless, some studies in the U.S found that, on average, men consume around 8210 kilocalories of alcohol a month and women 3790⁵.

Since alcohol consumption is markedly higher in most European countries compared to the US, these two figures must be taken as a lower bound for calorie intake in the average male and female population of Europe.

Nearly half of the EU population is overweight or obese, and alcohol contributes significantly to calorie intake in Europe. In some European countries, more than 10% of daily energy intake comes from alcohol⁶. At the same time, studies find that consumer knowledge about alcohol energy content is low; 80% of people do not know that a glass of wine contains roughly the same number of calories as a bar of chocolate⁷.



4 Calculations based on data retrieved from: Drinkaware.co.uk (accessed July 2017). Please note that accurate figures for calorie content in alcoholic beverages vary depending on the provider (i.e. website); proving the need for a unified system of provision of information to consumers.

5 Tujague J. And Kerr W. C. (2009) Metabolic Effects: Energy Intake Estimates of Respondent- Measured Alcoholic beverages. Alcohol and Alcoholism Vol. 44. No1, pp.34-41

6 Presentation by Sandra Caldeira (2017) at Cross-Border Aspects in Alcohol Policy – Tackling Harmful Use of Alcohol, as retrieved from: <https://www.eu2017.ee/political-meetings/cross-border-aspects-alcohol-policy-tackling-harmful-use-alcohol>

7 Himmelsbach E, Allen A, Francas M. (2014) Study on the impact of food information on consumers’ decision making. Brussels: TNS European Behaviour Studies Consortium; (https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_legislation_study_food-info-vs-cons-decision_2014.pdf accessed 17 January 2018)

Allergens

To better inform consumers who suffer from food allergies, EU directives have established guidelines for compulsory labelling of a variety of potentially allergenic substances contained in foodstuffs.

In 2012, Regulation 579/2012 on wine required listing: (i) eggs and egg based products, (ii) sulphites, (iii) milk and milk based products. To improve the readability of the information provided to consumers, listing might be accompanied by pictograms.

However, these are commonly-known allergens. Some consumers are allergic to specific ingredients that are not on the list of common allergens. Unlike other food products, alcoholic beverages are not obliged to list ingredients. The lack of ingredient labelling precludes customers from identifying other potentially problematic allergens in their drinks.

The labelling of foodstuffs, including labelling of ingredients and allergens, aims to enable European consumers to get comprehensive information on the contents and the composition of food products, and helps consumers to make an informed choice while purchasing their foodstuffs. However, when it comes to alcohol this does not seem to be the case. The European legislation has failed to allow consumers to make informed choices about the products they are purchasing.

Consumers want to know

When asked about information on alcoholic beverages, consumers overwhelmingly support the provision of more health-related information.

As part of the European 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. The same study also showed that education and information about calories affected consumers motivated by health goals - in particular those who check for low-alcoholic content and fewer calories.⁸

In the context of the European Union Joint Action on Reducing Alcohol Related Harm (RARHA) project, a snapshot was taken of consumers' perceptions and understanding of communication about alcohol related risks. 50.4% would like to have ingredient listing; 43.2% would like to have more information regarding calorie content and 37.9% would like more information about nutritional value. In their responses, consumers' responses stressed the need for information regarding potential health risks and suitable sources of information.

⁸ Himmelsbach E, Allen A, Francas M. (2014) Study on the impact of food information on consumers' decision making. Brussels: TNS European Behaviour Studies Consortium; (https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_legislation_study_food-info-vs-cons-decision_2014.pdf accessed 17 January 2018)

Similarly, a Brewers of Europe study in 2016 found that 86% of consumers call for the nutritional values of alcoholic drinks to be provided (per 100ml), as it is the case for non-alcoholic beverages⁹.

Time's up!

The topic of alcohol labelling has been gathering interest. The Alcohol and Tobacco Tax and Trade Bureau in the United States has developed voluntary guidelines for "Serving Facts" that can be included on alcohol labels. They include calories per serving and grams of carbohydrates, fat and protein. The adoption of such package labels remains voluntary for alcohol producers. In the US, however, it is the producers themselves who have argued for allowing the alcoholic drinks to be labelled, as they want to advertise products low in calories and carbohydrates.

The change in consumer attitudes and the importance of calories labelling is being recognised by European industry experts too. Speaking at a seminar at the London International Wine Fair at ExCel, Johnnie Forsyth, senior drinks analyst for global market research group Mintel, explained: "Health has become more of a priority in the past few years with calories now at the forefront of the consumer decision making process, and wine is no longer exempt."¹⁰

Over the last few years, the alcohol producers' position on the matter of labelling has evolved. Significant differences lie in the method to be used, with the spirits and wine producers preferring to provide information online. The wine industry has expressed strong opposition, not wanting to ruin the look of their bottles and the romanticised image it evokes.

The European brewer's association (Brewers of Europe) launched a pledge in 2015, in which their members committed to provide nutritional information on beers.

For years, public health organisations have been calling for more comprehensive labelling for alcoholic beverages.

In 2017, the World Health Organization placed alcohol labelling on the Codex Alimentarius (international food safety standard-setting body) agenda. Several developments at national, regional and international levels have raised expectations that Codex would develop standards for alcoholic beverages, possibly through defining 'alcoholic beverages', labelling of their contents and calories, or health warnings.

Codex delegates noted the divergence of labelling and related regulations on alcoholic beverages across its countries. The 44th session of the Codex Committee on Food labelling agreed to take alcohol labelling work forward.

⁹ GfK Belgium (2016) Consumer Insights Study, Report for the Brewers of Europe

¹⁰ Retrieved from: <http://www.thedrinksbusiness.com/2013/05/consumers-pushing-for-calorie-labelling/>

A discussion paper on alcohol labelling will be prepared by the Russian Federation with assistance of the EU, Ghana, India and Senegal.

However, it has to be noted that within the Codex Alimentarius forum, some parties have regrettably referred to Organisation internationale de la vigne et du vin (OIV) and the Fédération internationale des vins et spiritueux (FIVS). It was suggested that Codex does not have to work on this topic as the two organisations already deal with labelling. Here, it has to be emphasised that both OIV and FIVS are industry organisations. Public health and consumer perspectives are not taken into account in their work. It would be negligent on behalf of all stakeholders involved, including European Institutions, to allow the discussion on alcohol labelling to be hijacked by wine and spirits industry bodies.

Eurocare is pleased to observe that the EU has volunteered to take this work forward as it is a unique opportunity for a European solution to alcohol labelling to be adopted globally.

MAKING IT POSSIBLE

In March 2017, Eurocare welcomed the European Commission's published report on alcohol labelling required by Regulation (EU) No 1169/2011 on the provision of food information to consumers.

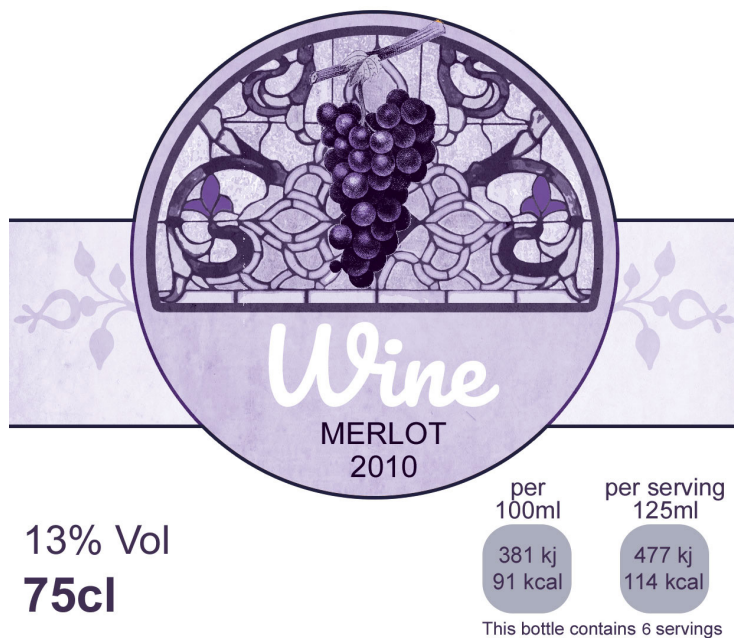

Eurocare fully agrees and supports the report's statement that **objective grounds have NOT been identified that would justify the absence of information on ingredients and nutritional information on alcoholic beverages or a differentiated treatment for some alcoholic beverages, such as 'alcopops'**.

Eurocare understands that the conclusions of the March 2017 report were a result of a political compromise, that granted alcohol producers a year to deliver a self-regulatory proposal that would cover the entire sector of alcoholic beverages.

However, Eurocare strongly believes that while assessing the industry's self-regulatory proposal the European Commission must prioritise the **consumer's right to know** over the industries potential difficulties with implementation of EU (Reg) 1169/2011.

The European Commission should only consider an industry proposal acceptable if it fully aligns with Reg (EU) 1169/2011, meaning:

- Provision of information on the bottles in form of labels; not referring consumers to a separate website
- Provision of information per 100ml, additionally information per serving size can be included
- Covering the whole sector, not proposing different labelling regimes for wine, beer and spirits
- Nutrition declaration composed of:
 - Energy value (kJ/kcal)
 - Fat (g)
 - Saturated fat (g)
 - Carbohydrates (g)
 - Sugars (g)
 - Proteins (g)
 - Salt (g)
- Ingredients in descending order of weight
- Name and address of the food business operator
- Minimum durability date (for alcoholic beverages of less than 10% abv)
- Lot number
- Allergens
- Alcoholic strength
- Net quantity

Wine is an alcoholic beverage made from grapes, generally fermented without the addition of sugars, enzymes, acids, water, or other nutrients.

The sugar in the grapes is consumed by yeast and converted to ethanol and carbon dioxide.

Different varieties of grapes and strains of yeasts will produce different styles of wine.


Variations can result from the reactions involved in fermentation, the complex interactions between the biochemical development of the grape, the terroir, and the production process.

Nutrition Information	Per 100ml
Energy values	381kJ/91kcal
Fat	-
(Of which saturated fat)	-
Carbohydrates	3.9g
(of which) sugars	3.9g
Proteins	-
Salt	-

Ingredients: grapes, yeast, carboxy methyl cellulose, tartaric acid, sulphur dioxide, isinglass

Contains Sulphites Lot number: L0007

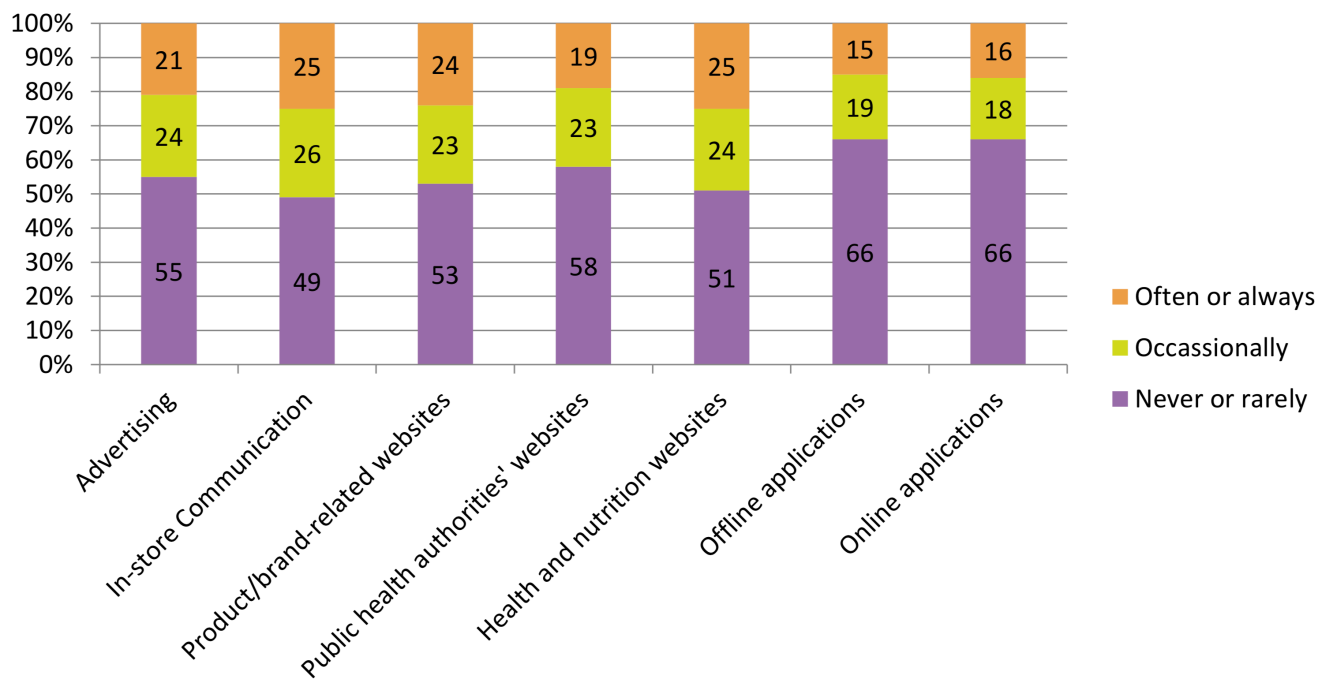
Produced by Fine European Wines, European Street, Brussels, Belgium.



“Go online” is not an option

Consumers consistently voice their desire for ‘on-label’ information, and for there to be no difference between the provision of information between alcohol and non-alcoholic beverages. As stated in the European Commission’s report on alcohol labels from 2017, the majority of consumers “never or rarely” use off-label information sources to access information on nutritional values and ingredients of alcoholic beverages.

In 2014, the Brewers of Europe commissioned a survey by GfK which found that the majority of respondents never or rarely use off-label information sources to access information on nutritional values and ingredients of alcoholic beverages (see chart).



Furthermore, although it is evident that the vast majority of the EU population is familiar with the internet, in 2016 Eurostat found that 14% of the EU population had never used the internet.¹¹

There will always be a segment of Europeans who for economic, social or other reasons do not use internet on a daily basis.

Similarly, QR codes would not prove a sufficient method to provide information to consumers in Europe. Scanning QR codes requires a specialized app that few people have on their phones. Around 35% of Western Europeans do not own a smart phone, which effectively precludes the use of QR codes¹². Furthermore, scanning a QR code is time consuming - opening the app, pointing camera at the code, focusing the camera, loading the webpage - which adds to the strain of the consumers.

¹¹ Eurostat (2016) Internet access and use statistics - households and individuals: http://ec.europa.eu/eurostat/statistics-explained/index.php/Internet_access_and_use_statistics_-_households_and_individuals#More_than_four_fifths_of_Europeans_used_the_internet_in_2016 accessed 17 January 2- 18

¹² Statista, retrieved from: <https://www.statista.com/statistics/203722/smartphone-penetration-per-capita-in-western-europe-since-2000/>

Easing the burden for small and micro enterprises

It has been argued that the variance of ingredients in the wine making processes depending on batches of grapes, together with the requirement to translate it to 27 languages, would put an enormous economic burden on small producers.

While Eurocare acknowledges that this point holds some validity, it would like to highlight that the majority of alcohol consumed in Europe is mass produced by multinational corporations that should be required to provide full information to their consumers. Citing the burden to small producers in order to avoid the obligation to provide information to consumers by multinationals is a questionable tactic.

Furthermore, the wine industry's perceived difficulty in implementing informative labels seems contrived: All other food sectors have managed to comply with EU regulations on nutritional information without compromising product design or scaring off customers. All other non-alcoholic beverages have indeed managed to accommodate the EU's requirements and still maintain their aesthetic packaging standards. The well-established wine industry should have no difficulties in doing the same.

Eurocare recognises the concerns of small producers. However, the EU has tools in its repertoire that could ease that burden. Currently, the Common Agricultural Policy spends nearly €250 million a year on wine promotion. Surely some of that money can fund the production of labels that would provide consumers with information on calories and ingredients.



