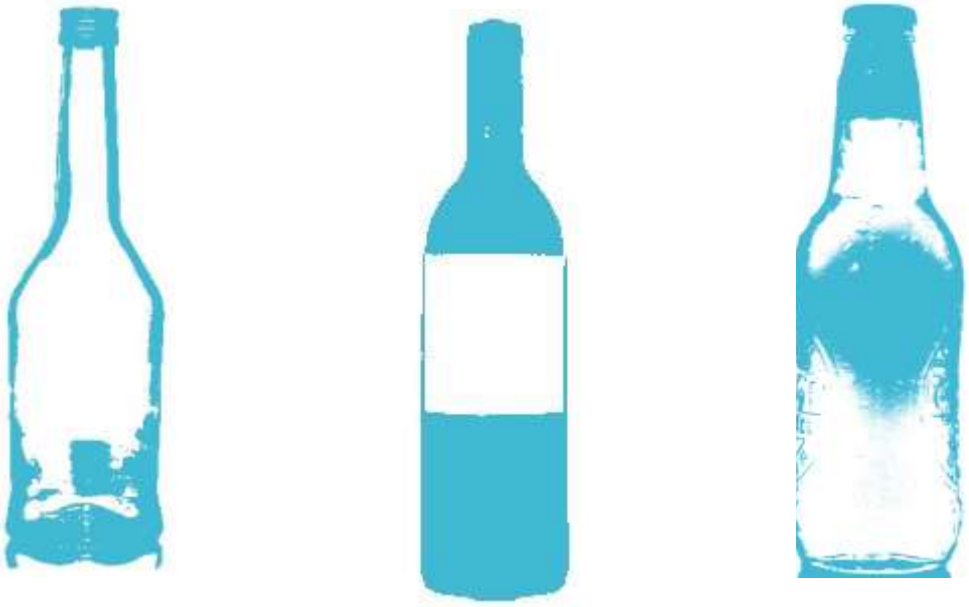
eurocare
European Alcohol Policy Alliance

WHAT IS IN YOUR BOTTLE?

ALCOHOL INGREDIENTS LABELLING

December 2013



17 Rue Archimede I 1000 Brussels I Belgium I Tel +32 (0)2 736 05 72 I Tel +32 (0)2 736 67 82
info@eurocare.org I www.eurocare.org

This publication arises from the operating grant which has received funding from the European Union in the framework of the Health Programme.

The European Alcohol Policy Alliance (EUROCARE)

The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governemental and public health organisations with 55 member organisations across 24 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in research and advocacy, as well as in the provision of information to the public; education and training of voluntary and professional community care workers; the provision of workplace and school based programmes; counselling services, residential support and alcohol-free clubs for problem drinkers; and research and advocacy institutes.

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

ALCOHOL - A CAUSE FOR ACTION

Alcohol is a key health determinant and is responsible for 7, 4% of all ill-health and early death in Europe, which makes it the third leading risk factor after tobacco and high blood pressure. Alcohol harm is disproportionately high among young people (115 000 deaths per year) and harms others than the drinker. 5 million Europeans are born with birth defects and developmental disorders because of their mother drinking during pregnancy. 5-9 million children are living in families adversely affected by alcohol. 10.800 traffic deaths and 20.000 murders involve alcohol in the EU each year. Furthermore, binge drinking among young people is on the rise, with most countries showing an increase from 1995.

Europe plays a central role in the global alcohol market, responsible for a quarter of the world's total production. However, the total tangible cost of alcohol to EU society in 2003 was estimated to be €125 billion (€79bn - €220bn) or €650 per household, equivalent to 1,3% GDP. The costs includes areas such as traffic accidents €10bn, crime damage €6bn, crime defensive €12bn, crime police €15bn, unemployment €14bn, health €17bn, treatment/prevention €5bn, mortality crime €36bn, absenteeism €9bn. Although these estimates are subject to a wide margin of interpretation, they are likely to be an underestimate of the true gross social cost of alcohol (excluding benefits)[1].

SUMMARY

Eurocare considers that labelling should be part of comprehensive strategy to provide information and educate consumers about alcohol and should be part of integrated policies and programmes to reduce the harm done by alcohol.

Consumers have the right to know the ingredients contained in alcoholic beverages they drink

Eurocare would like to call on the European decision and policy makers to work towards:

- Prompt inclusion of a list of ingredients, nutritional information (kcal) and health information on the labels

[1] All data taken from: Anderson P and Baumber B. (2006) *Alcohol in Europe*. London: Institute of Alcohol Studies

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WHY SHOULD WE CARE ABOUT ALCOHOL?

Consuming alcohol has long been a part of European culture, however with the advances of medicine we have become more aware of the risks that this consumption carries.

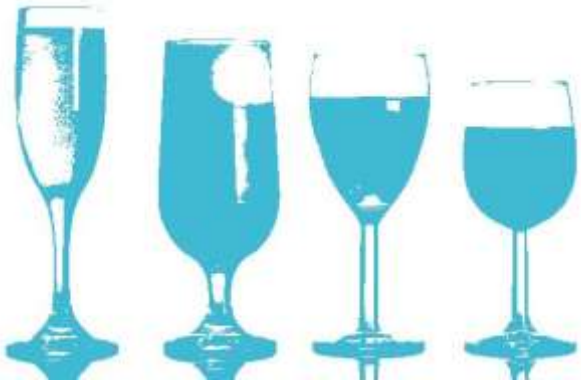
When it comes to alcohol consumption there is no entirely risk free level of consumption. Every drink, regardless of the type of alcohol adds to the risk of dying earlier. Moreover, the protective effect of alcohol is hugely overestimated. The detrimental effects of alcohol far outweigh any potential protective benefits. When it comes to alcohol consumption Eurocare fully follows and supports the World Health Organisation (WHO) message **less is better**.

Alcohol is a key health determinant and is responsible for 7, 4% of all ill-health and early death in Europe, which makes it the third leading risk factor after tobacco and high blood pressure. Alcohol can cause dependence as well as some 60 different types of diseases and conditions, including:

- Injuries
- Mental and behavioural disorders
- Gastrointestinal conditions
- Cancers
- Cardiovascular diseases
- Immunological disorders
- Lung diseases
- Skeletal and muscular diseases
- Reproductive disorders and prenatal harm
- Increased risk of prematurity and low birth weight

Alarmingly, Europe has the highest levels of alcohol use and suffers the highest levels of alcohol-related harm.

Moreover, alcohol accounts for nearly 10% of the calorie intake amongst adults who drink[2]. It has an energy value of 7kcal/g, second only to fat which is the most energy dense macronutrient at 9kcal/g. Therefore daily energy intake may rise considerably when alcohol is consumed[3].



[2] Bates B, Alison Lennox A, G S. National diet and nutrition survey: headline results from year of the rolling programme (2008/2009). London: Food Standards Agency, 2009

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

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 informing consumers of dangers and health risks from the product.

When a consumer drinks an alcoholic beverage, there is almost 100% chance that he or she does not know what they are drinking, unless they are determined enough to go through the effort of search on the company's website.

One of the objectives of the public bodies should be to protect people effectively from the risks and threats that they cannot tackle as individuals. In 2011 the European institutions have passed legislation[4] that requires food and any other soft drinks i.e. milk to list its nutritional information and ingredients. However, alcoholic beverages were exempted from this obligation.

Consequently, the ingredients in alcohol are not required to be listed anywhere on the label and producers have no legal obligation to disclose ingredients.

As put by the one of the largest world alcohol producers- Diageo
'In the year 2011, it's sort of bizarre that alcohol's the only consumable product sold that you can't tell what's inside the bottle'[5]

Eurocare could not agree more that the situation where consumer can tell what is in a bottle of milk but not in a bottle of beer is bizarre and unacceptable.

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

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

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

This paper will briefly examine what ingredients are in the alcoholic beverages and argue for the need to provide full product information to consumers in the European Union.

[4] EU Regulation 1169/2011 on the provision of food information to consumers
[5] Guy Smith, executive vice President of Diageo North America

WHAT IS IN ALCOHOLIC DRINKS?

Alcoholic drinks are generally yeast fermentation products of staple foods such as grains, grapes, or potatoes.

During fermentation, yeast converts the relatively high level of sugars present in all grain fruit and vegetables into alcohol (ethanol) and carbon dioxide gas that subsequently bubbles out of the brew into the air. The initial level of sugar (typically 10-26%) determines the amount of alcohol (5-12%) produced in the final drink.

The two principal chemical components in all fermented alcoholic drinks are water (85-95%) and alcohol (ethanol) typically in the 5-15% range, respectively. The alcohol percentage is usually expressed as a volume percentage rather than weight percentage.

An alcoholic drink, in addition to the alcohol and water contains naturally occurring or naturally produced chemical substances (macronutrients, micronutrients).

Methanol, certainly the most toxic common alcohol, occurs in beers, wine, and distilled drinks. In beers, the methanol level is usually very low (below 5 part per million, hereafter ppm). However, in wines, especially in red wines, the methanol level is sometimes as high as 100-200 ppm. The level of methanol in white wines is typically lower and generally under 100ppm. Methanol is not a fermentation product but originates from pectins found in the juice and the use of commercial enzymes produces the highest level of methanol.
Due to concentration during the distillation process, the quantity of methanol in distilled spirits is considerable higher 100-750ppm.
Methanol is naturally toxic, consumption of large quantities of some distilled spirits, especially illicit spirits, might prove fatal.

Apart from alcohol (ethanol) and some levels of higher spirits, there are also very significant quantities of organic acids such as: carboxylic acids, tartaric acids, malic acid, citric acid. To a lesser extent one can find: succinic, benzoic, cinnamic and gluconic acisds.

In terms of nutrient composition of alcoholic beverages they contain: water, carbohydrates, nitrogenous matter (proteins and amino acids) and lipids (fats).

A chemical analysis would be required for micronutrients information, however they could contain: calcium, potassium, copper, iron, magnesium, phosphorous, selenium, zinc, thiamine, riboflavin, niacin, pantothenate, pyridoxine, biotin, vitamin C, choline, betaine.

There is also a number of commonly utilised additives in alcoholic drinks production process, with the aim to facilitate the process or enhance the taste of the final product. They include: sulphur dioxide, potassium bisulfite, preservative and claryfing agents, pesticide residues.[6]

To see the full listing of authorised food additives see Annex II of Regulation 1333/2008[7]

[6] Boyle P et al (2013) Alcohol: Science, Policy, and Public Health. Oxford: Oxford University Press
[7] As retrieved from: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0016:0033:en:PDF

CALORIES

As was mentioned above alcoholic drinks are made by fermenting and distilling natural starch and sugar. Being high in sugar means alcohol contains a considerable number of calories, with energy content of 7.1 kilocalories per gram, only fat has higher energy value per gram (9kcal/g). Studies in the UK have shown that alcohol accounts for nearly 10% of the calorie intake amongst adults who drink[8].

Drinking alcohol also reduces the amount of fat body burns for energy. While nutrients, protein, carbohydrates, and fat can be stored in the body, alcohol cannot. Therefore the body system wants to get rid of it which takes priority; all of the other processes that should be taking place including absorbing nutrients and burning fat are interrupted.

Not surprisingly, there are associations between alcohol and obesity and these are heavily influenced by lifestyle, genetic and social factors[9]. Therefore, alcohol consumption should be taken into account in the examination of the causes of obesity.

Unfortunately, a limited number of researches have been done in this area. Nevertheless, some studies in the U.S have found that men consume around 8210 kilocalories from alcohol a month and women 3790[10]. The same study has confirmed that heavy drinkers consume more energy per month from alcohol than light or moderate drinkers - light: 1623 kilocalories, moderate: 7256 and 22,482 kilocalories- on a daily basis this would amount to 749 kilocalories from alcohol with most of these kilocalories coming from alcohol and not other ingredients.

Wine varieties, beer types and cocktails can have sizably different nutrient profiles and brand differences in % ABV or in non-alcohol ingredients; as a result, the total energy consumed in a drink differs widely.

Measured alcoholic beverages have on average 140 kilocalories, with 26% of the energy coming from non-alcohol ingredients. The average monthly kilocalories intake, from all alcoholic beverage types, can be estimated as 6423 kilocalories.[11]

Spirits- based drinks are found to have a higher average number of total kilocalories per drink than wine and beer containing 211 kilocalories, 64 (30%) of which are from non-alcohol ingredients.

[8] Bates B, Alison Lennox in Obesity and alcohol; an overview (2012) National Obesity Observatory, NHS
[9] *Ibid.*
[10] 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
[11] 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

An average half a litre of beer, 5% alcohol has an approximate  220 calories

A large glass of red wine, 13% alcohol has  170 calories

An average drink of whiskey, 40% alcohol has  111 calories[12]

However, as was mentioned before many people are not aware of the calories contained in alcoholic drinks they consume and have limited possibility to easily tracking them.

[12] That data was taken for beer Heineken and whisky Jack Daniels, as retrieved from: Drinkaware.co.uk

ALLERGENS

As was pointed out previously, many substances are added to food for a number of technical reasons, ranging from colouring and flavouring to nutrient and antimicrobial purposes.

Food ingredients are sometimes implicated as causative in food allergies and intolerances, various food additives, including various salts of sulphite and tartrazine, have been implicated in food intolerances.

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

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

ARE CONSUMERS LEFT TO WONDER?

European Union institutions are perfectly positioned to coordinate common efforts to inform consumers of both the composition as well as harmful effects of alcohol.

Alcoholic beverages in the European Union are affected by vertical regulation specifically applicable to their sector; this is mainly the case for wine and spirits. Furthermore, they are covered by horizontal regulations such as:

- labelling of foodstuff
- nutrition and health claims
- authorised food ingredients (additives, flavourings, enzymes)
- chemical safety (contaminants, pesticide residues, food contact material)
- food hygiene

The EU Regulation 1169/2011 on the provision of food information to consumers has made considerable changes to the food labelling legislation. The vote was a culmination of some very heated debates over a number of contentious issues.

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

Disappointingly, European consumers might be left to wonder what is in their drinks or how many calories they are consuming for the foreseeable future.

After the vote, Mr. John Dalli, the EU Commissioner for Health and Consumer Policy at the time, declared: *'I also regret to see that alcoholic beverages have been at this stage exempted from the ingredient and nutrition labelling requirements. I will however strive to ensure that we strike the right balance when we re-examine the issue in the near future'.*

This was echoed by one of the shadow Rapporteur working on the file Carl Schlyter (Greens/EFA) *'(...) we are very unhappy about full exemption for alcoholic beverages especially since many are unaware of the high calorie content of alcoholic drinks'.*

By 13 December 2014, the Commission shall produce a report concerning the application of Regulation 1169/2011 and address whether alcoholic beverages should in future be covered, in particular, by the requirement to provide the information on the energy value and the reasons justifying possible exemptions, taking into account the need to ensure coherence with other relevant Union policies. In this context the Commission shall consider the need to propose a definition of 'alcopops'[i].

In accordance with the Regulation 1169/2011 the European Commission is also adopting implementing acts on the mandatory indication of the origin of ingredients that do not originate from the place of last substantial change (when product origin is voluntarily labelled) The Commission has created a working group to discuss implementation issues and follow-up actions for origin labelling.

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 of food products, and help 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 greatly failed to allow consumers to make informed choice about the products they are purchasing.

STATE OF PLAY

Alcohol labels in the European Union must include the following information:

- Name under which the product is sold
- No trademark or brand name may substitute for the generic name, but may be used in addition
- Net quantity of pre-packaged beverage in metric units (e.g., liter, centiliter, milliliter)
- Indication of the acquired alcoholic strength; the labeling of beverages containing more than 1.2% by volume of alcohol must indicate the actual alcoholic strength by volume, i.e. showing the word "alcohol" or the abbreviation "alc." followed by the symbol "% vol."
- Date of minimum durability; this must consist of day, month, and year—in that order—and be preceded by the words "best before," "best before end," or "use by" for highly perishable goods.
- Any special conditions for keeping or use
- Name or business name and address of the manufacturer, packager, or importer established in the EU
- Place of origin or provenance

- Instructions of use, where appropriate
- Lot marking on pre-packaged beverages, with the marking preceded by the letter "L"

According to the Commission Directive 87/250/EEC on the indication of alcoholic strength by volume, the tolerances allowed in respect of the indication of the alcoholic strength by volume are:

- 0.5% vol. for beers having an alcoholic strength not exceeding 5.5 % vol. and beverages classified under subheading 22.07 B II of the Common Customs Tariff and made from grapes

1% vol. for beers having an alcoholic strength exceeding 5.5 % vol. and beverages classified under subheading 22.07 B I of the Common Customs Tariff and made from grapes; ciders, berries, fruit wines, and the like; beverages based on fermented honey

- 1.5 % vol. for beverages containing macerated fruit or parts of plants
- 0.3 % vol. for other beverages

European Union regulations allow for more than 50 different flavouring, additives, preservatives and agents to be added to alcoholic beverages.

Apart from horizontal exception to provide information to consumer, alcoholic beverages are covered by sector specific regulation, which will be briefly outlined below. However, it has to be highlighted that none of these regulations informs the consumer of the ingredients that can be found in alcoholic drinks or important health related information i.e. calories, sugars etc.

BEER

The average alcohol content of most beers ranges from 4.0% till5.7%; the grains which are the starting raw materials for beers typically contain half as much sugar as wine grapes. However, beer contains higher levels of complex carbohydrates in the final product.

Beer is made from commonly known ingredients such as: barely, maize, rice, millet, oats, rye and wheat hops, water and yeast as well as a number of additives used to stabilise, clarify, preserve and enhance colour and flavour. For instance beer can be made by adding: high fructose corn syrup (mainly in the US), caramel colouring, and some genetically modified organisms (GMO) like dextrose and corn syrup.

While some of them will be found in the end product, it has to be noted that some of them will be filtered out or discarded such as for instance fining agents. Similarly GMO sugars, if they are used, are digested and transformed in alcohol and CO2 by the yeast.

WINE

The chemical composition of wine varies widely and hundreds of compounds can be detected. Wine is covered by among others, the following EU rules with relevance to labelling:

- Council Regulation (EC) No 479/2008 of 29 April 2008 on the common organisation of the market in wine, amending Regulations (EC) No 1493/1999, (EC) No 1782/2003,

(EC) No 1290/2005, (EC) No 3/2008 and repealing Regulations (EEC) No 2392/86 and (EC) No 1493/1999

- Commission Implementing Regulation (EU) No 670/2011 of 12 July 2011 amending Regulation (EC) No 607/2009 laying down certain detailed rules for the implementation of Council Regulation (EC) No 479/2008 as regards protected designations of origin and geographical indications, traditional terms, labelling and presentation of certain wine sector products
- Commission Regulation (EU) No 538/2011 of 1 June 2011 amending Regulation (EC) No 607/2009 laying down certain detailed rules for the implementation of Council Regulation (EC) No 479/2008 as regards protected designations of origin and geographical indications, traditional terms, labelling and presentation of certain wine sector products
- Annex II of Regulation 1333/2008 on authorise food additives, including an explicit reference to the specific EU CMO rules on Oenological Practices for wines. This Regulation established the need for the submission on a case by case basis of a specific technical dossier in order to modify Annex II as to adopt it to the technical and commercial innovation while ensuring consumer protection.
- Regulation 579/2012 requires listing of: (i) eggs and egg based products, (ii) sulphites/ sulphites, (iii) milk and milk based products. Listing might be accompanied by pictograms which could improve the readability of the information provided to consumers.

The following must appear on a label in a single field of vision (i.e., can be viewed without having to turn the bottle), except for the Importer's details, the Lot number, and allergenic ingredients:

- Wine of "(country name)"
- Actual alcoholic strength
- Nominal volume
- Lot number
- Importer details: Must include name of importer, local administrative area, and member state, preceded by the word(s) "Importer" or "Imported by"
- Allergenic ingredients (i.e., if wine contains sulfites); if a wine contains more than 10 mg SO_2 per liter, the label must note "contains sulfur dioxide" or "contains sulfites"
- Wine variety and vintage may not be shown on labels of wine with non-geographical origin; only wine with a proper geographical indication may display such information

For the full list of additives, processing aids and physical processes which may be used to produce wine see Annex IA of Regulation 606/2009[13]

SPIRITS

Spirits, such as whiskies, brandies, and flavoured liquors have concentration of alcohol (ethanol) typically in the 35-60%. Similarly to wine, spirits are covered by a number of EU provisions:

[13] As retrieved from: http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:193:0001:0059:EN:PDF

- Regulation (EC) No 110/2008 on the definition, description, presentation, labelling and the protection of geographical indications of spirit drinks and repealing Council Regulation 1576/89, harmonises measures regarding European marketing of spirit drinks. Specific labelling and presentation rules are provided for by this Regulation. Where the labelling of a spirit drink indicates the raw material used to produce the ethyl alcohol of agricultural origin, each agricultural alcohol used shall be mentioned in descending order of the quantity used. The term 'blend', 'blending' or 'blended' may be used only if the spirit drink is a blend of two or more spirit drinks belonging to the same category. The maturation period or age may be specified only where it refers to the youngest alcoholic component and provided it was subject to revenue supervision or equivalent. Lead-based capsules or foil may not be used as closing devices for the containers of spirit drinks.
- Commission Implementing Regulation (EU) No 716/2013 of 25 July 2013 laying down rules for the application of Regulation (EC) No 110/2008 of the European Parliament and of the Council on the definition, description, presentation, labelling and the protection of geographical indications of spirit drinks.

REQUIREMENTS ACROSS THE EU COUNTRIES

The following summary was produced using the International Centre for Alcohol Policies data.[14] It presents only these countries in the European Union which go beyond the scope of the basic EU Legislation on labelling.

Country	**Additional Requirements**
Austria	Additional requirements: - Wine labels must show the origin of the wine and the amount of sugar and alcohol indicated as dry, semi-dry, sweet, or semi-sweet - Beer labels must show the amount of flavorings in weight percentage, amount of alcohol in volume percentage, and conditions for storage
Czech Republic	Additional considerations: - For wine that is more than 3 years old, the indicated alcohol by volume percentage should not vary by greater than 0.8%
France	Additional considerations: - Use of foreign names and vintage is forbidden when an equivalent French word exists (spirit names such as *vodka* and *whiskey* are acceptable)
Germany	Additional considerations: - Wine, sparkling wine, flavored wines, flavored wine beverages and cocktails, and spirits imported from non-EU countries are subject to special labeling regulations

[14] Retrieved from: http://www.icap.org/table/alcoholbeveragelabeling

Sweden	Must state the true alcoholic strength in percent by volume, as well as the minimum fluid content in millilitres - Labels on beer should state the alcoholic strength by weight, as well as the Roman numeral "III" - There is a general ban on the import of flavored spirits with an alcoholic strength of more the 60% by volume Additional considerations: - If the beer contains antioxidants, dye stuffs, preservatives, or sorbitol, this must be shown on the label
United Kingdom	Additional considerations: - Labels must be in British English - Packaging must show the number of standard alcohol units contained

CHANGE COMING?

The topic of alcohol labelling has been gathering interest also in other countries. Alcohol and Tobacco Tax and Trade Bureau in the Unites States has recently developed voluntary guidelines for "Serving Facts" that can be included on alcohol labels. They will include calories per serving and grams of carbohydrates, fat and protein. Such package labels have never before been approved in the US and they do remain voluntary for the alcohol producers to adopt. However, in the US it is the producers themselves who have argued for allowing the alcoholic drinks to be labels, as they want to advertise low calories and low carbohydrates products.

Nevertheless, as in Europe, a strong opposition from the wine industry can be observed, which do not want to ruin the sleek look of their bottles and romanticised image. The Wine Institute, which represents more than a thousand California wineries, said in a statement that it supports the move but "*experience suggests that such information is not a key factor in consumer purchase decisions about wine*."

The change in consumers' attitudes and the importance of calories labelling is being recognised also by some European industry experts. Speaking during 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"

Calorie labels can become an effective marketing tool for lower alcohol wines. Spirits brands have already responded to this new breed of health-focused consumer with lower calorie

"skinny" editions, such as the Smirnoff Sorbet Light range (78 calories per 44.36ml serving) and Malibu Rum Island Spiced (70 calories per serving)[15].

MAKING IT POSSIBLE

CONSUMERS RIGH TO KNOW

There is a limited number of studies on the effect of ingredient or nutritional information labelling on drinking behaviour. Some studies suggest that the majority of consumers cannot correctly interpret labelling information[16]. Moreover, some information can be interpreted opposite to the intention of the legislation. For instance research in the tobacco field has shown that consumers interpret allowed labelling claims of 'no additives' to imply that the cigarettes where more healthful, less likely to harm, and likely to be less addictive[17] Consumers may make similar extrapolations on products that contain nutrient content claims, and these extrapolation may be influencing purchasing patterns.

However, regardless of whether labels might affect drinking behaviour, it is hard to understand why alcoholic beverages are not subject to the same requirements for disclosing ingredients and nutritional information as non- alcoholic beverages.

Apart from the health aspect, there is also a consumer rights aspect in the discussions regarding labelling.
Eurocare is strongly convinced that it is the consumers' right to make informed choices about the products they purchase and it is public institutions obligation to allow them to perform informed choices.

INCREASING KNOWLEDGE AND DIMINISHING RISK PERCEPTION

In relation to alcoholic beverages (especially wine) labels play an important role, studies have shown that consumer use labels, especially the back label in wine is regarded as important source of information when making purchases[18].

Eurocare does acknowledge that care needs to be taken no to create a dissonance caused by the chemical information which could conflict with the widely held image of wine to be pure and manufactured by traditional methods. It could be expected that some consumers might react to this conflicting information by refusing the products with ingredients listing. Chemical information may trigger perceived risks; subjective uncertainty regarding the impact of some substances used in the production process would have to be mitigated.

[15] Retrieved from: http://www.thedrinksbusiness.com/2013/05/consumers-pushing-for-calorie-labelling/

[16] Satia JA, Galanko Ja, Neuhouser ML. Food nutrition label use is associated with demographic, behavioural, and psychosocial factors and dietary intake among African Americans in North Carolina. American Journal of Public Health. 2005; 105:391-402

Cowburn G, Sotckley L. Consumer understanding and use of nutrition labelling: a systematic review. Public Health Nutrition. 2005; 8:21-28

Lvey L, Patterson RE, Kristal AR, Li SS. How well do consumers understand percentage daily value on food labels? American Journal Health Promotion 2000; 14:157-160

[17] Arnett JJ. Winston's 'No Additives' campaign: 'straight up-no bull'? Public Health Reports 1999;114:522-527.

[18] Mueller S. Et al (2010) Message on a bottle: The relative influence of wine back label information on wine choice. *Journal of Food Quality and Preference* Vol .21

Some of the ingredients added are simply used in the production process and not harmful to the body in the finished process.

Eurocare would like to highlight that the aim of labelling initiatives should be to reduce consumer uncertainty instead of creating risk perceptions.

SOOTHING 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. Same argument has also been provided by the beer industry in relation to small and micro breweries.

While Eurocare acknowledges, the validity of this point, it would like to highlight that majority of alcohol consumed in Europe is mass produced by multinational corporations that should be required to provide full information to their consumers.

Using burden to small producers in order to avoid obligation to provide information to consumers by multinationals is a questionable tactic and on a border line with unethical.

For products such as wine a generalisation of calorie and carbohydrates could be envisaged, rather than having each vintage of each variety analysed. Eurocare could also foresee that microbreweries could be excluded from labelling requirements.

EUROCARE POSITION- INFORMED CHOICES

Alcohol product labelling is an important component of a comprehensive public health strategy to reduce alcohol-related harms. Labelling provides a unique opportunity for governments to disseminate health messages at the point of sale and point of consumption.

In comparison with other policy intervention to reduce alcohol related harm, such as increased taxation, labelling is regarded to have less of an immediate and visible effect. However, when examining the issues in the EU context, it is one of the few policies, where legislation at the EU level would prove feasible and in coherence with internal market principles.

It can be assumed that consumer would welcome more information on the bottles regarding potential substances with allergenic effect, composition and most importantly number of calories and sugars contained in their drinks.

Eurocare is convinced that bringing alcohol packaging in lines with non- alcoholic beverage packaging would enhance consumers' choice.

Given the considerable public health problem that obesity presents, caloric information is extremely relevant to consumers, and it is particularly disappointing that the European Union legislators have decided to exclude alcohol from the obligation to provide ingredients and nutritional information to consumers.

Kilocalories and other nutritional information would help consumers to make informed decisions regarding alcoholic beverage intake and would be useful to researchers trying to quantify alcohol and kilocalorie intake

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

As public health professional search for effective policies to address alcohol related harm, labels stand out as an underused and under tried way to empower consumers to make healthy decisions about alcohol intake.

Placing health information on alcoholic drinks and containers targets the appropriate audience (the drinker) at the appropriate time, when purchasing and using the product.