

Eurocare input to consultation on Food labelling - revision of rules on information provided to consumers



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The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governmental and public health organisations with 52 member organisations across 22 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, regarding alcohol consumption is **“less is better”**.

Eurocare is registered in the European Transparency Register under number: 01546986656-22.

Eurocare’s remarks

Eurocare welcomes the opportunity to comment on the Food labelling – revision of rules on information provided to consumers. Given Eurocare’s profile, comments will be given to areas in which it possesses expertise, mainly prevention and reduction of alcohol related harm.

In March 2017, Eurocare welcomed the European Commission’s 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 which 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”.

There are obvious health reasons why labels should include ingredients, nutritional and health 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. Drinking alcohol is associated with a risk of developing more than 200 different types of diseases¹. Every day in EU+ countries, around 800 people die from alcohol attributable causes (291.000 per year).² The main cause of death due to alcohol in 2016 was cancer (29% of alcohol-attributable deaths)³.

Product labels can serve several 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 are not aware of 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 unfortunately, exempted alcoholic beverages (containing more than 1,2% by volume) from the obligation to provide information

¹ WHO (2018), Global status report on alcohol and health.

² WHO Europe (2019), Status report on alcohol consumption, harm, and policy responses in 30 European countries 2019; results of joint WHO-EU project MOPAC

³ *Ibid.*

to consumers - listing its ingredients and providing nutritional information nor the harm the product can cause the consumer.

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.

Consumers should also be informed about the risks associated with alcohol consumption: damages to health (liver cirrhosis, cancers) risk of dependence, dangers associated with drinking alcohol during pregnancy, when driving, operating machinery and when taking certain medication.

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 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.

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.

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