

eurocare

European Alcohol Policy Alliance

Alcohol Labelling & Health Warnings Position Paper



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Our priorities

- The introduction of EU mandatory alcohol labelling on label
- A proposal for a Recommendation on the adoption of alcohol health warnings supported by the establishment of an EU health warnings library

About Eurocare

Eurocare is the only alliance of national, pan-European and international NGOs working exclusively on EU policy analysis and advocacy linked to the 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 provision of services for people whose lives are affected by alcohol problems.

Eurocare has become a recognised partner in the alcohol policy field working with the European Commission, the European Parliament, permanent representations, the OECD and the World Health Organisation. Eurocare has been a partner and leader in several European Union funded projects.

Eurocare is a not-for-profit international organisation registered in Belgium (AISBL). Eurocare and its members do not receive funding from the alcohol industry or industry-funded organisations.

Executive Summary

Eurocare’s position on the labelling of alcohol products is simple and straightforward. Alcohol products should provide nutritional and ingredient information in line with other products sold to consumers, and consumers should be informed of the most important health risks of products which have a substantial impact on the health and wellbeing of EU citizens. Alcohol producers successfully label their “no and low” brands as required by EU Food Information to Consumer regulations. Where external regulations are in place, manufacturers are able to meet the requirements. Alcohol products’ exemption from labelling requirements has lasted for almost 50 years now. There have been examples of good practice from

individual producers and retailers, but these have been very few and far between. The wine and spirits sectors have performed particularly badly with 97% of wine and over 75% of spirits products carrying no ingredient information.

There have been many calls over the years to resolve the impasse, not only from Civil Society, but from the European Parliament, member states and the European Commission, who in 2017 reported they could find no objective grounds for the current exemption. In 2021 the Commission’s Beating Cancer Plan placed a high priority on raising public awareness of the impact of alcohol on rates of cancer, with accurate, universal product labelling as a key action.

It is crystal clear that the most powerful parts of the alcohol industry, specifically in the wine and spirits sector, are opposed to providing information to consumers. The main obstacle to progress has been their actions to deny and discount the effects of alcohol, deflect discussions and delay any progress towards labelling regulation. This resistance has taken many forms over a long period, but the outcome is obvious to see. In contrast to many other parts of the world, in the EU there is still no clear and consistent information on nutrition, ingredients and health impact accessible to consumers on the product.

Citizens rightly expect to see information relevant to their consumption decisions on the product. The exceptional exemption is unjustifiable. Alcohol consumers have waited too long in the dark.

Introduction

The labelling of alcoholic beverages in the European Union has been the subject of intense debate and disagreement for over 40 years. Proposals from the Commission to mandate labelling in 1982 and 1992 both failed to secure agreement from the Council. A further Commission proposal from 1997 was finally debated in a Council Working Group in 2002 where a majority of Member States supported the application of general food labelling rules to alcoholic beverages.¹

In 2011 the EU adopted the **Food Information to Consumers (FIC) Regulation (EU) No 1169/2011**.² It contains very basic provisions on the regulation of alcoholic beverages (see page 7 below).

Several consultations on alcohol labelling have been carried out over the last twenty years both prior to and after the adoption of the FIC regulation. Health experts and consumer representatives have consistently argued for the extension of the EU food labelling regime to all alcoholic beverages. They were supported by a 2015 European Parliament resolution³ that called for a Commission proposal for calorie labelling on alcoholic beverages and Council Conclusions at the end of 2015 that called for the Commission to consider introducing mandatory ingredient and nutritional labelling.⁴

In a 2017 report the European Commission reviewed the scientific evidence, history and current state of alcohol labelling and concluded:

“On the basis of the information reviewed, the Commission has not identified objective grounds that would justify the absence of information on ingredients and nutrition information on alcoholic beverages.”⁵

Notwithstanding this political support and policy finding, alcoholic beverages continue to enjoy a derogation from most provisions of the FIC. This is in large part down to the lobbying power of the economic operators who, until recently opposed all labelling requirements. In 2018 their position changed and they conceded that consumers do have a right

to information about their products. However, their change of heart did not extend to agreeing that the FIC regulation should be applied to alcoholic beverages. Their preferred approach was and continues to be a self-regulatory one. In 2018 they presented a self-regulation proposal to the Commission.⁶

Where do we stand in 2023? In 2021 the European Commission’s Beating Cancer Plan⁷ made a “political commitment to leave no stone unturned to take action against cancer”. As part of this political commitment the Commission indicated that it would make a proposal to amend the FIC and mandate ingredient and nutritional labelling on all alcoholic beverages by the end of 2022. However, this has not happened and EU citizens and MEPs⁸ are still waiting for the proposal from the EU Commission. A further initiative on health warnings is also promised before the end of 2023, with the two measures separated for technical reasons. It is unclear as to whether the delay on ingredient and nutrition labelling will impact the timetable for the warning label proposal. However, as we are now less than a year away from the 2024 European Parliament elections, we can assume that it will.

The Food Information to Consumers (FIC) Regulation (EU) No 1169/2011

The FIC regulation governs the provision of food information to consumers in the European Union. It requires food labelling to inform consumers as to the composition and ingredients of the food, protection of consumers’ health and the safe use of food, its durability, storage and the health impact, including the risks and consequences related to harmful consumption of a food and on nutritional characteristics.

Remarkably, whilst these provisions apply to beverages such as milk, non- alcoholic beer and soft drinks, Article 16(4) of FIC exempts alcoholic beverages containing more than 1,2% by volume of alcohol from the mandatory indication of the energy value, full nutrition declaration and list of ingredients. We therefore find ourselves in the position of having no mandatory EU labelling on a product on widespread sale in the European Union with

proven detrimental effects on health and society.

Regulation (EU) 2021/2117: Some alcoholic beverages will be subject to new compulsory labelling changes as of December 2023. Article 6a of Regulation (EU) 2021/2117 will require aromatised wine products to be labelled for the first time.⁹ Aromatised wines are wines that have a minimum alcohol content of 14.5% by volume and a maximum of 22% ABV and are flavoured with herbs, spices, fruit or other natural flavourings. Bottles produced after 8 December 2023 will need to provide information on the list of ingredients and nutrition. However, only additives and the energy value must be on the label or packaging on the product. All other ingredients and nutritional information can be made available online by means of a QR code or URL. This is likely to be hosted on a new platform established by the Comité Européen des Entreprises Vins (CEEV) and Spirits Europe. For more information on this platform see page 15. The nutrition and ingredients information must not be displayed with other information intended for sales or marketing purposes and user data may not be collected or tracked.

Eurocare believes that compulsory labelling should apply to all alcoholic beverages and that they should be regulated according to the FIC Regulation. We also do not believe that it is appropriate for this information to be provided off-label (see page 18).

Why we need to change this: the health impacts of alcohol

According to the WHO European region 2022 framework, *‘alcohol is a causal factor for more than 200 diseases, health conditions and injuries and is a Group 1 human carcinogen.’* Alcohol also *‘exacerbates existing health inequalities; similar levels of alcohol consumption are associated with a more damaging impact on the health of more deprived individuals and their families than wealthier drinkers.’* It is responsible for *‘one in every 10 deaths in the European region each year, amounting to almost 1 million in total.’* Younger people are *‘disproportionately affected by alcohol compared with older people, and 13.5% of all deaths among*

*those aged 20–39 years are attributed to alcohol.’*¹¹

- **Cancer:** Alcohol has been linked to seven cancers, including oesophagus, liver, colorectal and breast cancers.¹² Even low to moderate levels of drinking (less than 1.5 L of wine (12% by volume; ABV) per week have been linked to 23,000 cases of cancer in the EU in 2017.¹³ Half of these were female breast cancers and a third were linked to consumption of the equivalent of less than a bottle of wine per week.
- **Cardiovascular disease:** It is sometimes stated that light alcohol consumption could have a small protective effect against the risk of cardiovascular disease or type 2 diabetes. Some studies have shown this, particularly in older or middle-aged people.^{14,15,16} However, the maximum drinking limits are very low and the protective effect is lost once these limits are reached. The World Heart Federation has stated: *‘The evidence is clear: any level of alcohol consumption can lead to a loss of healthy life. Studies have shown that even small amounts of alcohol can increase a person’s risk of cardiovascular disease.’*¹⁷ In any event, *‘no studies have shown that the potential existence of a protective effect for cardiovascular diseases or type 2 diabetes also reduces the risk of cancer for an individual consumer.’*¹⁸
- **Overweight and obesity:** Alcohol is relatively high in calories, with an energy value of 7 kcal/gram, which is higher than any other macronutrient other than fat (9 kcal/gram). Alcohol may also contain added sugars (i.e., pre-mixed drinks, ciders) or fats (i.e., cream liqueurs), which further increase the caloric content of alcoholic beverages. As a reference, one standard 175 ml glass of wine or a pint of 5% strength beer can range between 133 kcal and 239 kcal, which is comparable to the energy value of a chocolate bar.¹⁹ Thus, the regular consumption of alcohol products can contribute to higher total energy intakes and increase the risk of overweight and obesity.
- **Allergic reactions:** Alcohol products may contain several of the most common allergens: gluten, nuts, eggs, crustaceans, milk and sulphites. Less common allergens may also be present in

alcohol products, for instance yeast and grapes.

Given the evidence we now have, it is safe to assume that *'no safe amount of alcohol consumption for cancers and health can be established. Alcohol consumers should be objectively informed about the risks of cancer and other health conditions associated with alcohol consumption.'*²⁰

The most recent alcohol policies

The 2022-2025 WHO Europe region **Framework of Action on Alcohol**²¹ identified six priorities for policy action, including health information with a focus on labelling.

At EU level, the **Beating Cancer plan**²² was drawn up in cooperation with the Cancer Mission Board, a group of EU cancer experts tasked with defining the vision and research actions of the first ever EU cancer mission. With a budget of up to €1 billion between 2021 and 2027 the mission is tasked with, *'improving the lives of more than 3 million people by 2030 through prevention, cure and for those affected by cancer including their families, to live longer and better.'* **Before we spend those €1 billion on research into treatments for cancer patients, perhaps we should start with simple preventative steps, such as information and warning labels on alcoholic drinks products.** The Beating Cancer plan calls for mandatory nutritional and ingredient labelling on alcoholic beverages and should be implemented. The fact that its proposed deadlines have been allowed to slip, despite being agreed at the highest political levels, suggests that the old 'business as usual' system of allowing health-harmful industries to dictate health policy responses to key societal problems whilst health and social care systems pick up the pieces is still alive and well. But, if the Covid-19 pandemic has taught us anything, it is that this can no longer stand or be afforded.

The response of civil society and the health community: The Oslo Declaration

The Oslo Declaration²³ is a united call for seven actions at the national and international level to reduce alcohol harm, including labelling and health warn-

ings. Since it launched in June 2022, **more than 91 international, European and national civil society organisations** have joined the call to protect the health, welfare and consumer rights of European citizens.

The Oslo Declaration states that "EU level regulation should reflect public support for mandatory ingredient, nutrition declaration and warning labels on alcohol products, so empowering properly informed consumer decisions."

The Oslo Declaration recognises alcohol labelling as one important policy measure as part of a comprehensive approach to tackle the harm caused by alcohol. This involves the implementation of the WHO Best Buys and SAFER recommendations, which include price and taxation policies, actions to reduce alcohol availability and marketing regulations.

The alcohol industry response: opposition to on-label information provision

Economic operators advance many reasons for opposing on label information and extending the FIC regulation to all alcoholic beverages. They object to the evidence of harm caused by their products and equate the labelling of alcohol products with labelling of cigarettes: *'It's not fair to compare alcohol with cigarettes,'* said Ettore Prandini, president of the Italian agricultural lobby Coldiretti, in an interview to Politico in January 2023 in response to proposals for new labelling legislation from Ireland.²⁴ In the same article, Spirits Europe argued against legislative proposals on labelling in Ireland on the grounds that they don't differentiate between 'moderate' and 'excessive' alcohol consumption (but the evidence presented in section 5 above shows that there is no safe level of consumption so that argument falls away).

Brewers of Europe stated that the Irish measures *'represent a significant, unjustified and disproportionate barrier to the free movement of goods.'* At the moment, the internal market is not harmonised. The lack of EU level coordination has already led to internal market fragmentation with Member States introducing measures individually. Arti-

cle 41 of the FIC permits Member States, pending the adoption of the Union provisions, to maintain national measures as regards the listing of ingredients for beverages containing more than 1.2% by volume of alcohol. Some member states (Austria, Bulgaria, Croatia, CZ, EL, IRE, LT, PT and RO)²⁵ apply more rules to alcohol labelling than others but this is also fragmented. For example, two (Austria and Bulgaria) only have this requirement for beer.²⁶ Nutritional values on label are also planned in Ireland and Norway. Hence, a harmonised system of mandatory ingredients and nutritional labelling under the FIC regulation would in fact remove trade barriers.

The same arguments apply to the *principle of proportionality*. In order for a measure to be proportionate under EU law, Union legislators or Member States must show that (i) the relevant measure can be justified on health grounds and (ii) that there is no other less restrictive measure available that could attain the same effect. For decades, the Court of Justice of the European Union (CJEU) has consistently upheld the right of Union or Member State legislators to enact legislation to protect human health under the single market or other national legal bases and found that such legislation is proportionate.²⁷ Furthermore, EU and Member States and economic operators have already accepted that it is proportionate to enact and implement mandatory nutritional and ingredients labelling for alcohol products with less than 1.2% alcohol by volume ABV. It must, therefore, be proportionate for products containing more than 1.2% alcohol by volume to meet the same labelling requirements.

It's marketing, stupid!

The real reason for opposition to on-product labelling is that economic operators view labels as a key marketing tool and opportunity to make a sale, including to younger consumers.²⁸ They claim that their products are premium and that on label ingredients would detract from their brand. Their argument could also be applied to many other premium but non-alcoholic geographically protected food products, such as Strandzhanski manov honey from Bulgaria, Montes de Toledo olive oil from Spain or Italian prosciutto di Par-

ma; but they are not. These products all comply with the FIC regulation labelling requirements and are still sought after and bought. Reputations and markets developed over decades, and sometimes centuries, don't disappear overnight because of a new requirement to put the ingredients on a label on the product.

Industry opposition to on-label information provision is clear from the results of a study published by the EU Joint Research Centre (JRC) in 2022:

In the report a survey carried out by Euromonitor in 27 EU countries analysed the labelling of alcohol products by type (beer, wine, spirits, ready to drinks (RTDs) and cider/perry).²⁹ The results, were extremely mixed. Despite their promises in the 2019 memorandum of understanding (MoU), the wine and spirits sectors have made scarcely any progress between then and 2022: 97% of wine products surveyed and 75.9% of spirits carried no ingredient labelling at all. The beer and cider sectors made a better effort in providing ingredient information (88.2% and 55.9% respectively), but again provided far from 100% coverage.

Energy labelling was implemented even less and this was consistent across all sectors. When it came to **full nutrition** labelling the results were uniformly dire: Only 9.3% of beers, 0.2% of wines, 0.3% of spirits, 9.4% of RTDs and 4.9% of ciders and perry drinks displayed it on the label.

Economic operator responses to a changing consensus on harm and the need for legislation:

Notwithstanding their longstanding resistance to information provision, economic operators have started to change their approach to labelling over recent years. In 2019 in an effort to head off mandatory labelling they presented a joint MoU to the EU Health Commissioner with six principles and pledges.³⁰ In sector-specific annexes some committed to ensure that, by the end of 2022, information on the nutrition and ingredients of alcoholic products sold in the EU would be made available to consumers.³¹

The MoU was followed up in 2021 with the launch of a voluntary new e-label platform. According to an

article in industry publication *Beverage Daily*³², SpiritsEurope and the CEEV (Comité Européen des Entreprises Vins) created the platform to ‘provide consumers with information on ingredients, nutrition information, responsible drinking guidelines and sustainability.’ The JRC analytical report also looked into this.

The survey established that many alcoholic beverages do now provide a link/QR code or URL to a website for the product. This included 100% of ciders in 7 countries and 100% for wine, spirits, cider and RTDs in Greece. However, out of a total of 405 potential opportunities – five alcoholic drinks sector types, 3 types of labelling: ingredients, energy and full nutrition; and 27 countries - only one (spirits sold in Belgium) provided online nutritional information. The conclusion is that whilst the alcohol industry is keen to promote voluntary online labelling to prevent mandatory legislation being enacted it is not very keen to provide comprehensive nutrition and ingredients information. Even when promoting a tool with the supposed intention of informing the public, the alcohol industry simply turns it into another way of promoting its products: Industry websites will tell you about taste and terroir. They won’t tell you what’s in the bottle and how many calories it contains.

This cynical behaviour by the economic operators, especially since its ‘non-binding’ MoU in 2019, confirms what health advocates have known for decades: they are not serious about supplying FIC regulation information to consumers. Their bottom line is profit, not health. Economic operators have learned nothing since 2020 and will continue to resist change and drag their feet on meaningful engagement with consumers. This is why we need EU policymakers to accept and act on the evidence they have commissioned: Only mandatory labelling for all alcoholic beverages via a speedy revision of the FIC regulation will protect the health and interests of EU consumers and harmonise the internal market in alcoholic beverages.

Clarity is also needed to deal with **new market entrants**. Hard seltzers are alcoholic drinks made with water and fruit flavours and an alcohol content

of around 5%. They have enjoyed significant market growth in the US in recent years where sales reach \$2 billion a year. They are now beginning to be marketed in Europe. Whilst some industry analysts believe the prospects for similar sales growth in the EU are limited³³, others expect a few brands to meet with success as they are backed by beverage industry giants such as Coca-Cola and AB-InBev.³⁴

However, because of their mix of water and fruit, as well as their lower calories, some hard seltzer brands have fallen foul of advertising and health claim regulations in the UK³⁵ and risk doing the same in the EU given the plethora of different rules in the absence of mandatory EU level rules. The application of the FIC regulation with alcohol specific requirements would provide a level playing field and legal certainty for new product as well as established ones.

The highest priority: Full nutrition declaration and ingredients information on label only

The Rationale - Consumers’ right to information: The most appropriate way to respect consumers’ right to information is to give it to them in the most practical form, which means putting ingredients and nutrition information on label as it is for every other food and beverage. This would allow citizens to have “*the information and tools they need to make healthier choices*” as the Commission set out in Europe’s Beating Cancer Plan 2021 and to “*provide information to consumers to make informed choices*”, as it said in a 2006 communication on preventing alcohol-related harm.³⁶

More than two-thirds of all respondents responding to a Commission consultation in 2022, including those from groups with an economic interest in opposing labelling, agreed consumers should be given ingredient and nutrition information for alcoholic beverages “*as is the case for other foods and beverages*”.³⁷

Why QR codes are not a valid option: Consumer groups, and all Oslo Declaration supporters, insist this information must be made available on label. Putting alcohol products nutrition and in-



redient information off label, hidden behind QR codes as economic interests propose, serves only to conceal information which might usefully challenge consumers' mistaken assumptions.

In the same 2022 Commission consultation mentioned above, between 86% to 93% of consumer group organisations disagreed with statements saying consumers had the equipment to access QR codes, that they would use QR code, that they would pay attention to them or would consider them reliable.

It goes without saying that scanning QR codes requires a smartphone, a specialised app and a reliable and strong data connection. According to research from the Pew Center in 2019 whilst 87% of Dutch residents owned a smartphone, only 59% of Greeks did so.³⁸ According to EU Commission data, 46% of Europeans lack basic digital skills.³⁹ There is also a rural divide in access to the internet and smartphones.⁴⁰ For these reasons, **online labelling has the poten-**

tial to widen health inequalities even further, only allowing a certain set of the population to have access to basic nutrition and ingredients information.

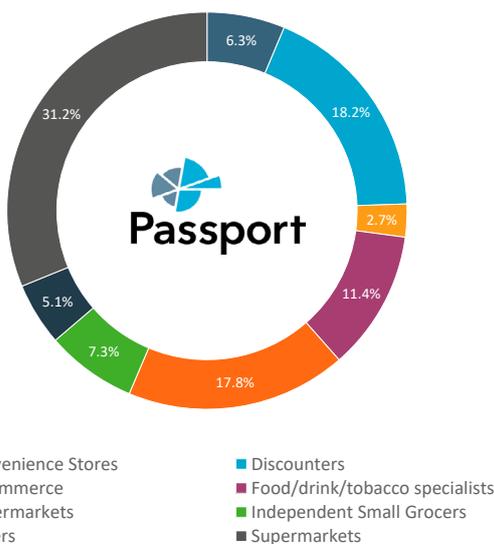
Finally, insisting on putting consumer information online ignores the practicalities of how we shop. A report commissioned by the EU Joint Research Centre from Euromonitor in 2022 found that supermarkets dominate retail distribution of alcoholic drinks in the EU27.⁴¹

If alcohol producers are permitted to label online, this risks undermining the EU consumer information framework as food producers ask for equal treatment. Expecting consumers to check QR codes for 50 or 60 items in their food basket rather than looking at immediately accessible labels on products would greatly extend the amount of time the shop took. The result would be fewer rather than more well-informed consumers and years of progress on consumer rights would fall away.



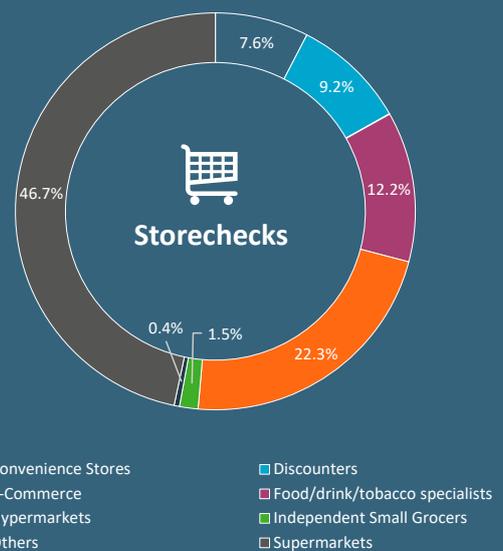
Supermarkets dominate alcoholic drink retail distribution in the EU

Retail Distribution (Passport): Alcoholic Drinks in EU27, 2020



© Euromonitor International

Retail Distribution (Proportion of SKUs Captured Using Storechecks): Alcoholic Drinks in EU27



High Priority 2: A proposal for a Recommendation on the adoption of alcohol health warnings supported by the establishment of an EU health warnings library

A proposal for a Recommendation on the adoption of alcohol health warnings supported by the establishment of an EU health warnings library must quickly follow to fully inform consumers of the risks of alcohol, alcohol products' defining ingredient, a carcinogen contributing to dozens of other illnesses and harms. A 2021 systematic review with meta-analysis of warning labels found that they can be effective in reducing harmful consumption of alcoholic drinks.⁴²

The Commission has decided to separate out the introduction of warning labels from nutrition and ingredient labels for technical reasons, but neither step makes sense in isolation. Consumers' right to information is only satisfied when they have all the information they need at hand, on label. A lack of EU coordination on warning labels has also created unnecessary internal market fragmentation. In France and Lithuania labels warn consumers about potential health consequences of alcohol in pregnancy, with a pictogram or text.⁴³



On the 22nd of May, the Minister for Health Stephen Donnelly brought into law the world's first comprehensive health warning of alcohol products; the Irish government signed into law the Public Health (Alcohol) (Labelling) Regulations 2023 and the remaining

provisions of Section 12 of the Public Health (Alcohol) Act. Section 12 and the Labelling Regulations together introduce comprehensive health labelling of alcohol products sold in Ireland and provide that similar health information will be available for customers in licensed premises. The law provides that the labels of alcohol products will state the calorie content and grams of alcohol in the product. They will warn about the risk of consuming alcohol when pregnant and will also warn of the risk of liver disease and fatal cancers from alcohol consumption. The labels will direct the consumer to the HSE website, www.askaboutalcohol.ie, for further information. There is a three-year lead-in time built into the law in order to give businesses significant time to prepare for the change. The law will apply from 22 May 2026.

The Norwegian Directorate of Health recommended in 2022 that alcoholic beverages be marked with cancer warnings.⁴⁴

Different Member States are advancing at different speeds according to local political conditions. **The EU should create a library of warnings to enable all Member States to introduce warnings consistently, in line with the scientific evidence base.**

Outside Europe pregnancy warning labels will be mandatory in Australia and New Zealand.⁴⁵ In the Eurasian Economic Union alcoholic beverages must now include a health warning "*excessive alcohol consumption is harmful to your health*".⁴⁶ In South Korea consumers are specifically warned of the risk of cancer.⁴⁷

As the World Health Organisation states, "*Once phased in, alcohol warning or information labels cost very little and, at the very least, remind consumers and society at large that alcohol is no ordinary commodity.*"⁴⁸ On its own, it is no panacea to alcohol harm, but proper information provision is essential to solving complex problems.

Example warnings

TEXTUAL AND PICTORIAL WARNINGS



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Conclusions

The scientific evidence of the harm caused by alcohol is clear. It plays a causal role in 7 types of common cancers and over 200 diseases and injuries in total. There is no scientifically determined safe level of consumption as far as the risks of cancer are concerned.

Debate has raged in the EU for forty years as to whether all alcoholic beverages should carry on-product labels of ingredients and nutritional value as well as common allergens. The requirement for all other packaged food and drink products, including alcohol products with less than 1.2% by volume of alcohol, to be labelled makes a mockery of any argument that stronger alcoholic beverages should be exempt from the FIC regulation. If the EU and Member State legislators have determined that consumers should be informed as to the ingredients and energy values of a litre of milk, they should be informed of the ingredients and energy values of a litre of wine or spirits.

In third countries including the USA, Brazil, Canada, China, India, Mexico, New Zealand, Russia, and Switzerland it is already mandatory to provide the list of ingredients for certain alcoholic beverages.⁴⁹ Some countries have already moved to implement warnings on alcoholic products and more will follow.

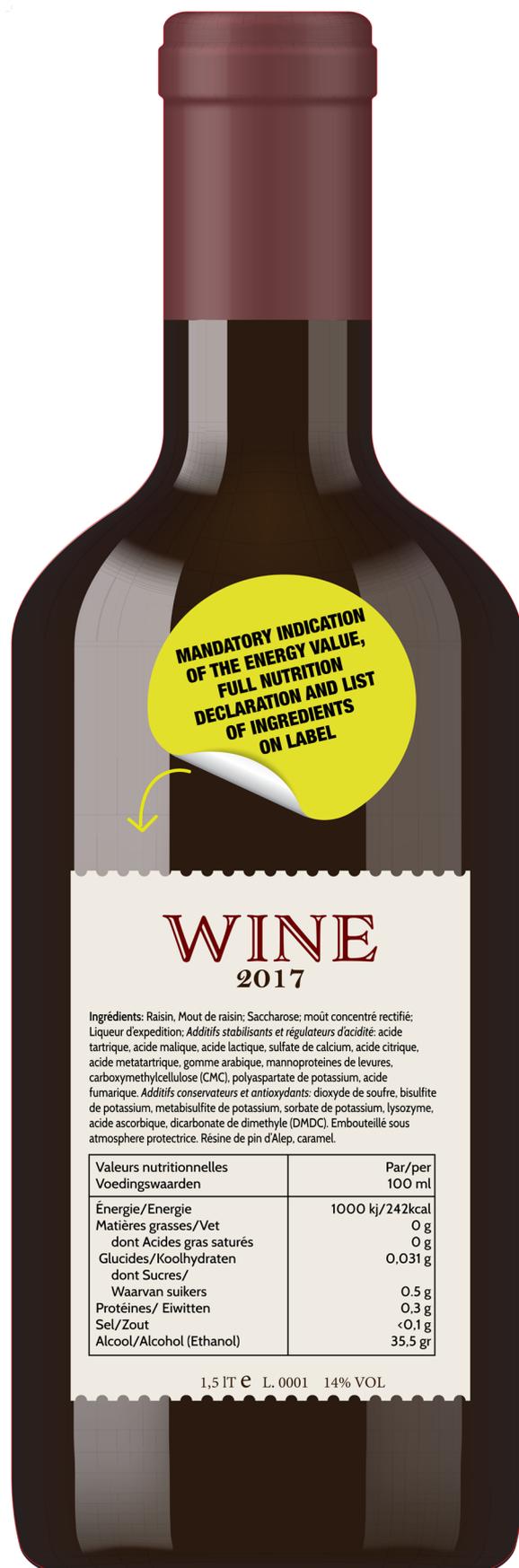
The EU has an opportunity to come from behind and use its status as a global economic superpower to lead the world in empowering, informing and protecting consumers. This means putting consistent, evidence-based information and warnings on alcohol products, on hand when needed, on label.



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 49. [REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL regarding the mandatory labelling of the list of ingredients and the nutrition declaration of alcoholic beverages, \[4.2\]](#) (European Commission, 2017)



WINE 2017

Ingrédients: Raisin, Mout de raisin; **Saccharose;** moût concentré rectifié; Liqueur d'expédition; **Additifs stabilisants et régulateurs d'acidité:** acide tartrique, acide malique, acide lactique, sulfate de calcium, acide citrique, acide metatartrique, gomme arabique, mannoprotéines de levures, carboxyméthylcellulose (CMC), polyaspartate de potassium, acide fumarique; **Additifs conservateurs et antioxydants:** dioxyde de soufre, bisulfite de potassium, metabisulfite de potassium, sorbate de potassium, lysozyme, acide ascorbique, dicarbonate de diméthyle (DMDC), Embouteillé sous atmosphère protectrice. Résine de pin d'Alep, caramel.

Valeurs nutritionnelles Voedingswaarden	Par/per 100 ml
Énergie/Energie	1000 kJ/242kcal
Matières grasses/Vet	0 g
dont Acides gras saturés	0 g
Glucides/Koolhydraten	0,031 g
dont Sucres/ Waarvan suikers	0,5 g
Protéines/ Eiwitten	0,3 g
Sel/Zout	<0,1 g
Alcool/Alcohol (Ethanol)	35,5 gr

1,5 ltr e L. 0001 14% VOL



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