

Ref.: BEUC-X-2018-028/MGO/cm

Brussels, 12 April 2018

Subject: BEUC Position on Alcohol Industry Self-Regulatory Proposal

Dear Commissioner Andriukaitis,

I am writing on behalf of BEUC, the European Consumer Organisation which represents 43 independent national consumer associations from 31 European countries. We would like to express our strong disappointment regarding the self-regulatory proposal¹ recently published by the alcohol industry on the provision of nutrition information and ingredients listings for alcohol products.

At a time of high levels of obesity across Europe, nutritional information is a crucial tool for empowering consumers to make informed choices in the supermarket. Alcoholic products are frequently as high in calories as chocolate, information which is unfortunately not currently provided to consumers on the label.

Regrettably, the general proposal from the industry and the different approaches outlined in the sectoral annexes fail to live up to consumer expectations.

Online labelling

The suggestions put forward by the proposal from the alcohol industry that nutritional and ingredients information could be provided, not on the label, but rather online via the use of QR codes, web links or bar codes and at the discretion of the producer, is unacceptable from a consumer perspective.

Regardless of whether or not one might own a smartphone, we already know that consumers make their purchasing decisions in a matter of seconds. It is therefore unfair and unrealistic to ask already busy shoppers to spend the extra time and effort to access information via QR codes, web links or bar codes for each alcohol product they are interested in buying.

Furthermore, on-label information allows consumers to easily compare between several bottles on the shelf. Providing a nutritional declaration and ingredients listings via QR codes or web links would, even if scanned, only permit consumers to access information for each bottle one at a time. Not only is this clearly more time-consuming for shoppers, but it also restricts the ability of the consumer to make simple comparisons between products.

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¹ Joint self-regulatory proposal from the European alcoholic beverages sectors on the provision of nutrition and ingredients listing (guiding principles). AICV, CEVI, CEEV, The Brewers of Europe, Copa Cogeca, EFOV, SpiritsEurope, March 2018.

Moreover, an acceptance of this flexibility which would allow alcohol producers to provide information online instead of on the label could create a dangerous precedent with consequences beyond the alcohol sector. Other actors in the food and drink industry could be prompted to demand similar treatment for their products, to the detriment of consumers.

Therefore, it is crucial that nutritional information and ingredients listings are provided for the consumer on the label of alcoholic products and in conformance with the Food Information to Consumers Regulation (1169/2011)², as is already the case for all other food and drink products.

To allow consumers to make informed and healthy choices, it is essential that information on nutrition and ingredients of alcohol products is aligned with other food and drink products. Given the shortcomings of the proposal announced by the alcohol industries we would urge the European Commission to take the necessary steps to introduce a legislative proposal which ends the unjustified special exemption currently afforded to alcohol products.

Please find in annex, further information regarding our position on the alcohol industry's proposals.

We thank you in advance for your consideration and remain at your disposal to further discuss this important matter.

Yours sincerely,

Monique Goyens
Director General

² Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers.

ANNEX: BEUC Position on the Alcohol Industry's Proposals for the Provision of Nutrition Information and Ingredients Listing for Alcohol Products

BEUC agrees with the conclusions reached by the European Commission's March 2017 report which found that there were no 'objective grounds' to justify the continued exemption for alcohol products from having to provide ingredients and nutritional information to consumers. We are therefore disappointed with the proposal and associated sectoral approaches published by the alcohol industry on the 12th of March 2018 which fail to align alcohol products with the obligations met by other food and drink manufacturers and does not therefore meet consumer expectations. It should be noted that some producers from each of the different sectors (wine, spirits and beer) are already providing either ingredients or nutritional information for their products, including in some cases, on the label.

Nutritional Labelling

- As clearly outlined in the Food Information to Consumers Regulation (1169/2011), any nutritional information voluntarily provided must nevertheless still comply with the rules laid down for mandatory nutritional information provision. If an alcohol producer wishes to additionally provide portion size nutritional information they are able to do so but only once they have fulfilled their obligations, as per the legislation, to provide the information on a per 100ml basis.
- From a consumer perspective, '100ml' is an essential and objective reference point to allow straightforward comparison between products. Portion sizes can vary considerably depending on the consumer and can be difficult to estimate in products which are not sold in single-serve containers. Furthermore, studies have shown that when self-serving alcoholic drinks at home consumers can frequently over-pour the portion³.
- We therefore encourage the European Commission to reject any attempts to diminish the 'per 100ml' requirement for the provision of nutritional information for alcohol products.
- It is regrettable that the alcohol industry has failed to commit to providing the full nutritional declaration which is obligatory for all other food and drink manufacturers. Providing the full nutritional declaration and not just the energy value of an alcoholic product would give consumers a more complete picture of its nutritional profile. As with the non-alcoholic drinks sector, the nutritional profiles of alcoholic drinks can vary considerably. For example, some alcohol products can contain high levels of sugar whilst others (such as popular cream liqueurs for example) can have significant amounts of fat and saturated fat. Consumers should be provided with this information in the same way it is provided for all non-alcoholic drinks.

Ingredients Labelling

- The Food Information to Consumers Regulation (1169/2011) provides a clear definition of an 'ingredient':

'any substance or product, including flavourings, food additives and food enzymes, and any constituent of a composite ingredient used in the manufacturer or preparation of a food and still present in the finished product'.

The alcohol industry should not be given exemptions to deviate from this definition. In particular, the call from the wine industry for an 'ad hoc' approach for their products which would omit any mention in the list of ingredients of acids or sweeteners should not be permitted. Wine products which have been dealcoholized already provide full ingredients information in conformance with the regulation.

- The alcohol sectors are required to inform consumers if their product contains one of the most common allergens. However, since they do not have to provide ingredients information, consumers with allergies to less common substances are currently unable to tell from the label if an alcoholic product might contain such a substance. It is important that such information is instantly available to consumers, on the label.
- As outlined in the Commission's alcohol labelling report last year, a significant number of Member States have already adopted national measures which require labelling requirements for ingredients or certain ingredients for alcoholic beverages or certain alcoholic beverages.

³ Standard drink measures in Europe: People's Understanding of standard drinks and their use in drinking guidelines, alcohol surveys and labelling. RARHA, May 2015.