



PROTECT

Alcohol Labelling policies to protect young people

Alcohol labelling policies to protect young people



Stockholm — 11 June 2009

CRIOC

Centre de Recherche et d'Information
des Organisations de Consommateurs



Outline

- Consumer policy, labelling and consumer safety
- PROTECT: project on “Alcohol labelling policies to protect young people”
- Stakeholders’ view on alcohol labelling: Delphi survey

Consumer Policy

- Consumer policy is based on fundamental consumer rights: the right to protection of safety and health, the right to be informed (+ education)...

http://ec.europa.eu/dgs/health_consumer/index_en.htm

- Consumers' right to information:

general labelling requirements

Commission proposal on food labelling rules (January 2008)

- Labelling of Alcoholic Beverages



Consumer policy: fundamental consumer rights

- **Health and consumer protection policies share common objectives:**
 - protection against risks and threats
 - improving decision-making of citizens about their health and consumer interests

Commissions' actions:

- to ensure that consumers, through the provision of essential food information, are able to make informed purchasing choices and to make safe use of food
- to protect consumers' safety: a General product safety Directive (GPSD)

Consumers' right to information

- The consumer should be able to make his choices in full knowledge of the facts: detailed horizontal and vertical rules on labelling of products and services
- For foodstuffs the actual labelling rules* are explicit.
 - The information must be accurate, clear and easy to understand ; not in any way hidden or obscured by other written or pictorial matter ; may not be misleading ...
 - The labelling of foodstuffs must contain a list of about 10 elements
 - Alcoholic beverages are not required to carry all label information

* General food and nutrition labelling respectively covered by Directives 2000/13/EC and 90/496/EEC.



Proposal for a Regulation on the provision of food information to consumers (1)

- In January 2008 the EC adopted a proposal on the provision of food information to consumers. This proposal combines Directive 2000/13/EC on the labelling, presentation and advertising of foodstuffs and the Directive 90/496/EEC on nutrition labelling for foodstuffs into one instrument.

[COM(2008) 40 final, 2008/0028 (COD) - Brussels, 30.1.2008]

- The proposal recasts and replaces provisions already in place under the current legislation.
- It says little on alcohol labelling.

Proposal for a Regulation (2) : the labelling of alcoholic beverages

- Beverages containing more than 1,2 % by volume of alcohol should mention the actual alcoholic strength by volume. (art 9 and annex X)
- **The list of ingredients and the nutrition declaration is not required for wine, beers and spirits (art 20 & art 29.1).**

The Commission shall report after five years on the state of the play on the Community rules regarding the ingredient lists on these products and may accompany this report by specific measures determining the rules for labelling ingredients.

- **However, ready to drink mixed beverages (so called alcopops) should provide the list of ingredients and the nutrition declaration.**

Proposal for a Regulation ⁽³⁾ : the labelling of alcoholic beverages and the consumers' health

- Allergen labelling is mandatory for 14 substances (Annex II), e.g. (1) cereals containing gluten... (7) milk and products thereof, (8) nuts...

Except for e.g. cereals, whey, and nuts

used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other beverages containing more than 1,2 % by volume of alcohol.

- Regulation (EC) 1924/2006 of the EP and of the Council of 20 December 2006 on **nutrition and health claims** made on foods: beverages containing more than 1,2 % by volume of alcohol shall not bear health claims. [OJ L 404, 30.12.2006 and corrigendum OJ L 12, 18.1.2007]

Proposal for a Regulation ⁽⁴⁾ : the consumers' health

- One of the Commission's public health priorities is to promote healthier diets ⇒ mandatory nutrition labelling
- No word in the proposal on health warnings on alcohol



“With regard to warning labels, the Commission will explore, in co-operation with Member States and stakeholders, the potential for developing efficient common approaches throughout the Community to provide adequate information”.

“Warning labels are however only one – albeit important – element within a range of measures that can improve information and raise awareness, and should therefore be part of a broader strategy. The Commission will therefore support Member States and stakeholders in their efforts to develop information and education programmes with regard to alcohol consumption and pregnancy.” [Response from the Commission to a question from a MEP]

State of the play

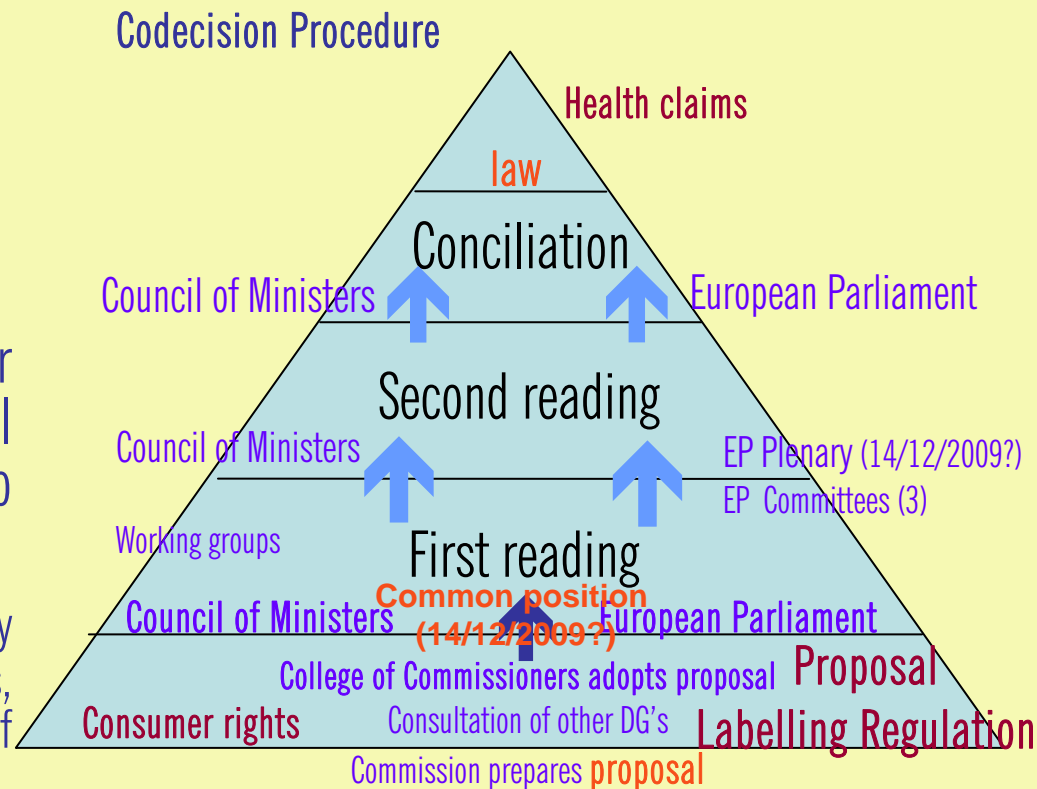
- Proposal was transmitted to EP & Council on 01.02.2008
- One reading or two?
- Mandatory consultation of EESC

- A regulation

However, there is room for Member States to promote additional national schemes provided they do not undermine the EU rules.

“MS may require additional mandatory particulars for specific types of foods, justified on grounds of the protection of public health or of consumers... “ (art 38)

85 % of the legislation affecting consumers is decided on EU level



General Product Safety Directive ⁽¹⁾

- Objectives of the General Product Safety Directive (GPSD) :

- To ensure that consumer products placed on the EU market are safe

“Safe product”: any product which, under reasonably foreseeable conditions of use, does not present any risk or only the minimum acceptable risks compatible with the product’s use

- To protect consumer health and safety
- To ensure the proper functioning of the internal market

General Product Safety Directive ⁽²⁾

- Must inform consumers of the risks associated with the products they supply (Article 5)
- Food in general is not within the scope of the GPSD

This Directive shall apply to all products defined in Article 2(a). However:

- It covers consumer products not subject to any vertical Community Directive*
- For products subject to specific safety requirements imposed by Community legislation (vertical Directives) => this Directive applies only to the aspects and risks not covered by those requirements

PROTECT: Alcohol labelling policies to protect young people (1)

- **Project:** 1 April 2008 – 30 September 2010.
- **Funded by DG Sanco:** Executive Agency for Health and Consumers
- **Partners:** DHS – Eurocare – INC (France) – LNCf (Lithuania) – EEC (Spain) – ANPCPPS (Romania) – OFE (Hungary)
- **Collaborating partners:** Institute of Public Health of Slovenia - European Youth Forum - Alcohol Policy Youth Network – Alcohol Policy Network of the Building Capacity project - National Foundation for Alcohol Prevention (STAP) - World Health Organization Regional Office for Europe - Danish Alcohol Policy Network - Estonian Temperance Union - Vereniging voor Alcohol en andere Drugproblemen vzw (VAD) - Finnish Association for Healthy Lifestyles - Finnish Centre for Health Promotion – Active, International organisation. Headquarters in Sweden - IOGT-NTO - University of Bergen (for HP-Source)
- **Links with other projects:** PHP – FASE – Building Capacity

PROTECT (2): Objectives (1)

- **General objective:** to build capacity at the European, country and local levels by
 - providing information of the experience, evidence base and need for consumer labelling of alcoholic beverages, particularly to create a supportive environment to help prevent the harmful use of alcohol amongst young people;
- Active sharing of best practice on consumer labelling targeted at young people should upwardly harmonize policies and programmes to invest in young people's health and well-being.

PROTECT (3): Objectives (2)

- **Specific objectives:**

- To determine consumer interest in labelling of alcoholic beverages and the potential influence on the drinking behaviour of young consumers
- To gain formal commitment to measurable best practice and data sharing between involved stakeholders
- To collect experiences and good practices from all European countries
- To ensure that information about and the main findings of the project are actively disseminated

PROTECT (4): Activities

- PROTECT will
 - assess young people's consumer needs for labelling;
 - gather experiences and best practices on consumer labelling from all Member States; and
 - seek commitment from a range of public and private sector stakeholders to measurable best practices and data sharing.

PROTECT (5): Methods (1)

- **Assessment of young people's consumer needs for labelling (between 18 & 25 years) :**
 - 6 consumers' associations will organise young people's panel groups in six Member States (Belgium, France, Hungary, Lithuania, Romania, and Spain);
 - Discussion on the content, design and placing of information labels, the type of information to be included (for example, warnings about drinking and pregnancy, drinking and driving), the information on the strength and content of the alcoholic beverages; on packaging, information material and other educational approaches.

PROTECT (6): Methods (2)

- Enlisting of experiences and best practices on consumer labelling from all Member States
 - The overview of good practices : electronic gathering of information;
 - Completed with face-to-face interviews;

PROTECT (7): Methods (3)

- Protect will seek for a commitment from a range of public and private sector stakeholders to measurable best practices and data sharing.
 - A stakeholder meeting with about 15 to 20 representatives of European organisations, to ensure a multi-level bottom-up governance based on the principle of formal commitment to measurable best practice and data sharing between involved stakeholders.

PROTECT (8): Methods (4): Stakeholder meeting

- Starting points for the stakeholder meeting :
 - The report on the young people's panels (WP4)
 - The report on the Member State experiences (WP5)
 - The results of the Delphi Survey in the PHP project (http://www.dhs.de/makeit/cms/cms_upload/dhs/delphisurvey_alcohol_labelling_crioc.pdf)
 - The impact assessments of the proposal for a new labelling regulation.

A Policy Delphi survey (1)

- Pathways for Health Project (PHP) on binge drinking, drink driving and health labelling, coordinated by DHS.

http://www.suchtwoche.net/web/dhs_international/pathways.php

The Delphi survey was carried out by CRIOC, a consumer research centre.

- Labelling can be understood as one measure in a more general comprehensive approach to reduce alcohol-related harm ⇒ “consumer information concerning alcoholic beverages”

A Policy Delphi survey (2)

- A dialectical process during which experts are questioned: Each expert can comment his answers \Rightarrow everyone is given feedback on the whole set of responses \Rightarrow respondents are asked to confirm or adapt their answers based on the new information
- Overall objective of a Delphi survey: to expose all the different options and opinions regarding an issue and the principal pro and con arguments for these positions
- In a Policy Delphi survey generating a consensus is not the prime goal

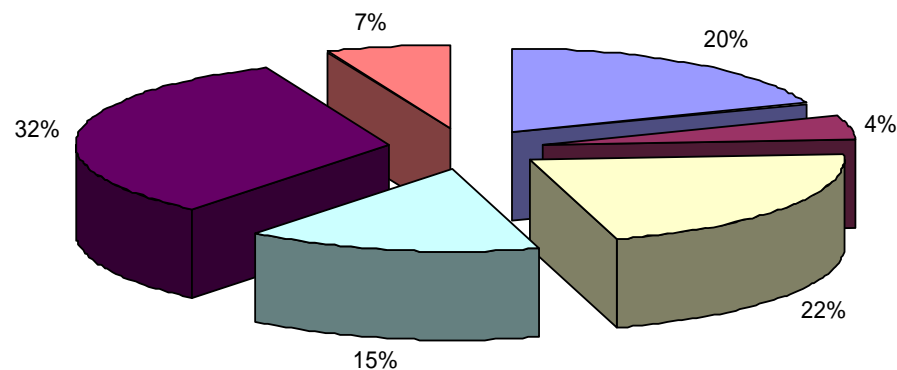
Methodology of the Delphi survey

- Two consecutive phases in June 2007
 - Questionnaire with 20 statements sent by mail
 - In the second round the questionnaire with the results of the first round was sent again to all 212 experts (anonymity was guaranteed)
- Sample of 212 experts belonging to the different stakeholders:
 - Federations of producers (21) , catering (2) , distributors (2)
 - Non-governmental organisations dealing with prevention (51)
 - Governmental institutions from 27 Member States (83)
 - Consumer organisations (47)
 - Media (6)
- Analysis of answers and comments for each statement

Participation

Total of contacts and respondents of the two rounds

Respondents both rounds (total = 46)



Group	Contacts	Response		
		1st	2nd	Total
Media	6	-	-	-
Producers alcohol beverages	21	7	8	9
Catering & Distribution	4	2	1	2
Non-governmental Organizations	51	7	8	10
Consumers' Organizations	47	7	3	7
Government Dept. Health	60	13	11	15
Government Other	23	2	2	3
Total	212	38	33	46

- First round: 38 respondents (18%)
- Second round: 17 confirmations, 16 supplementary comments, 8 new respondents
- Total: 46 respondents (22%)

Questionnaire (1) : do you agree... not agree

1	The government is responsible for the protection of the consumer. This responsibility includes regulating the communication concerning alcohol products (advertising, public information campaigns, presentation in catering, pubs and shops...)
2	Health warnings on alcohol containers have a negligible effect on public drinking behaviour and will not reduce harmful drinking.
3	The consumers need to be mainly sensitized through education and public information campaigns, in order to promote wise alcohol use.
4	Every container holding an alcoholic beverage needs to have a label with a health warning.
5	Health warnings need to stipulate the various negative effects on health from harmful alcohol use. Alternating messages should be communicated, randomly chosen from a predefined pool of warnings.
6	All the way through their education youngsters need to be clearly informed about the risks and responsible use of alcohol.
7	Health warnings on labels of alcohol products are a necessary element in a global strategy to prevent harmful alcohol use.
8	Advertisements may not target youngsters between 12 and 18 years old or use communication channels regularly frequented by this group (no ads during youth programs on radio or TV, no ads in youth magazines, no ads on websites that are regularly frequented by youngsters).
9	Children under the age of 12 have to be legally protected from alcohol advertisements and distribution.
10	Voluntary codes of conduct formulated by the alcohol industry are sufficient to enforce a responsible communication strategy for alcohol drinks.

Questionnaire (2) : do you agree... not agree

11	Every form of communication (radio or TV spot, advertising in written and electronic press...) on alcohol drinks needs to be accompanied by a clear health warning.
12	Alcohol consumption is an important factor in social life and should therefore not be stigmatized by means of mandatory health warnings (on labels, in advertisements...).
13	Where health warnings need to be present on the label, they should be on the front of the label and easily distinguishable from other information on the label.
14	Health warnings need to focus only on high risk groups, e.g. drivers and pregnant women.
15	When a new policy is to be outlined, alcohol pops and other alcohol products, known to be popular drinks amongst youngsters, should be prioritized.
16	Alcohol publicity must be forbidden.
17	Additional information concerning substances that could induce allergic reactions needs to be written on the label.
18	Alcohol labels should mention a list of ingredients and nutritional properties of the beverage.
19	Pictograms or photographs are valid alternatives for textual health warnings.
20	Pubs and the catering business have a responsibility in the prevention of harmful alcohol use.

Results from Delphi survey

Consultation on alcohol labelling

6	All the way through their education youngsters need to be clearly informed about the risks and responsible use of alcohol.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	2	2	1	0												
8	Advertisements may not target youngsters between 12 and 18 years old or use communication channels regularly frequented by this group.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	2	1	0											
9	Children under the age of 12 have to be legally protected from alcohol advertisements and distribution.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	3	3	3	3	2	2	2	1	0														
20	Pubs and the catering business has a responsibility in the prevention of harmful alcohol use.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	1	0								
1	The government is responsible for the protection of the consumer. This responsibility includes regulating the communication concerning alcohol products.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	2	2	2	2	2	1	1	1					
13	Where health warnings need to be present on the label, they should be on the front of the label and easily distinguishable from other information on the label.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	2	2	2	2	2	1	1	1	1	1	1	1	0					
4	Every container holding an alcoholic beverage needs to have a label with a health warning.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	2	2	1	1	1	1	1	1	1	0						
7	Health warnings on labels of alcohol products are a necessary element in a global strategy to prevent harmful alcohol use.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	2	2	1	1	1	1	1	1	1	1	0					
11	Every form of communication (radio or TV spot, advertising in written and electronic press ...) on alcohol drinks needs to be accompanied by a clear health warning.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	2	2	2	2	1	1	1	1	1	1	1	1	0						
17	Additional information concerning substances that could induce allergic reactions needs to be written on the label.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	3	3	3	2	1	0	0	0	0	0	0	0	0	0	0					
3	The consumers need to be mainly sensitized through education and public information campaigns, in order to promote wise alcohol use.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	0			
15	When a new policy is to be outlined, alcohol pops and other alcohol products, known to be popular drinks amongst youngsters, should be prioritized.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1
5	Health warnings need to stipulate the various negative effects on health from harmful alcohol use. Alternating messages should be communicated	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	3	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	0		
18	Alcohol labels should mention a list of ingredients and nutritional properties of the beverage.	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	1	1	1	1	0	0	0	0	
2	Health warnings on alcohol containers have a negligible effect on public drinking behaviour and will not reduce harmful drinking.	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	0
16	Alcohol publicity must be forbidden.	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	0	
19	Pictograms or photographs are valid alternatives for textual health warnings.	5	5	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0			
10	Voluntary codes of conduct formulated by the alcohol industry are sufficient to enforce a responsible communication strategy for alcohol drinks.	5	5	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	3	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0			
12	Alcohol consumption is an important factor in social life and should therefore not be stigmatized by means of mandatory health warnings.	5	5	5	5	5	4	4	4	4	4	4	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0			
14	Health warnings need to focus only on high risk groups, e.g. drivers and pregnant women.	5	5	4	4	4	4	4	4	4	4	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0			

5=strongly agree; 4=agree; 3=neutral; 2=disagree; 1=strongly disagree; 0=not qualified;-1=not answered

Some conclusions (1)

- The numerous comments received in this process demonstrate the **lively ideas and the numerous, sometimes very opposing, views**. The results show how the issue is experienced and how different interests are at stake. Moreover, they reveal how delicate the discussion is.
- A large consensus exists on the **right of objective consumer information and its importance**. However, the definition of what is 'correct' and 'essential' information as well as the measures to be taken to optimise the effectiveness of this information are subject of debate. Especially **the aspect of health warnings provoked many controversial reactions**.

Some conclusions (2)

- The results confirm in part, **the traditional breaches between the different stakeholders**. For instance, on the use of health warnings, and on which information should be mandatory, the respondents are much divided. The same divergence is noticed concerning the functioning of voluntary self-regulatory codes.

The sector very often expresses its aversion to the stigmatization of a product and underlines the importance of (responsible) alcohol consumption in social life.

- On the contrary, **an overall convergence on the protection of minors from alcohol advertising** reveals the need for a global approach for the prevention of alcohol misuse, for the important role of education, for a shared responsibility of all stakeholders. . . .

Final conclusion

- The report aims to **facilitate the debate** on alcohol labelling in a context of reduction of alcohol-related harm. By exposing all the different options and opinions and the principal pro and con arguments for these positions it sets out beakens for the debate, so that more profound discussions are possible without having to start all over every time.
- While more convergent opinions are shared and sometimes certain statements are less disputed than often thought, a good basis for a potential discussion exists.
- For some statements, the reactions are more opposite and the arguments divide the stakeholders more strongly. They **invite for more specific actions**: a search for new cooperation, new alliances which narrow traditional breaches but at the same time leave room for an evolution in the social reflection....

PROTECT (9)

- The reports on the young people's views, the Member State experiences and the stakeholder commitments will be actively shared with all relevant networks and organizations involved in consumer protection and the health of young people at all levels;
- PROTECT will support adding labels to alcohol containers to help establish the social understanding that alcohol is a special and hazardous commodity, leading to enhanced protection of young people, reduced alcohol-related accidents, and increased consumer information on the potential risks of alcohol.

THANK YOU

Ingrid Vanhaevre

Editor :
Marc Vandercammen

CRIOC
Research and Information Centre for Consumer Organisations
Foundation of public interest
Boulevard Paepsem, 20 - 1070 BRUXELLES
Tél. 02/547.06.11 - Fax. 02/547.06.01
www.crioc.be
NE 417541646

Edition 2008
Catalogue Ref. : 901-08

D 2008-2492-34
©CRIOC

Price : 12 €

Reproduction for non-commercial purposes is allowed provided that the source is mentioned