

# eurocare

European Alcohol Policy Alliance

actis | Rusfeltets  
samarbeidsorgan



AlcoholAction  
Ireland



ALCOHOL  
FOCUS  
SCOTLAND

ALCOHOL  
JUSTICE  
The Industry Watchdog

Alkohol &  
Samfund



AIDEFAD  
+conosci + proteggi + vivi

BASL  
British Association for the Study of the Liver



Corporate  
Europe  
Observatory

STAP  
DUTCH  
INSTITUTE FOR  
ALCOHOL POLICY

ÉGALITÉ



epria  
european  
public health  
alliance

EUROPEAN  
FASD  
ALLIANCE

EUPHA  
EUROPEAN PUBLIC HEALTH ASSOCIATION

eurocare  
European Alcohol Policy Alliance

EurocareItalia  
Pubblicazione scientifica e promozione della salute umana

EASL™  
The Home of Hepatology

ecda  
european  
chronic  
disease  
alliance  
United to reverse the rise in chronic disease



ELPA  
European Liver  
Patients' Association

EMSA  
European Medical  
Students' Association

BALANCE  
Getting the  
measure of alcohol



dkfz  
GERMAN  
CANCER RESEARCH CENTER  
ON THE HELMHOLTZ ASSOCIATION  
Research for a Life without Cancer

DHS  
Deutsche Hauptstelle  
für Suchtfragen e.V.

Global Alcohol  
Policy Alliance



GUTTEMLER  
...SELBSTHILFE UND MEHR

FUNDACIÓN  
SALUD Y COMUNIDAD  
FOUNDATION HEALTH AND COMMUNITY  
FONDATION SANTÉ ET COMMUNAUTÉ

Institute  
for Health  
and Environment

utrip  
institute for research and development

IAS  
Institute of  
Alcohol Studies



Youth Health  
Organization  
INTERNATIONAL



Alkohol- und drogenfrei leben.  
Für persönliches und soziales Wohlbefinden.



moige  
proteggiamo i nostri figli

NordAN  
Nordic Alcohol and Drug Policy Network



KREFTFORENINGEN

Oral Health  
Foundation  
Better oral health for all

platform for better  
oral health  
in europe



S.A.F. OCEAN INDIEN  
Prévention des conséquences de l'alcool pendant la grossesse

Scottish  
Families  
Affected by Alcohol & Drugs

SHAAP  
SCOTTISH HEALTH ACTION ON ALCOHOL PROBLEMS  
www.shaap.org.uk

SNODA  
Slovensko združenje za  
kronične nenalezljive bolezni  
Clean NCD Alliance



CPME  
MEDECINS EUROPEENS  
EUROPEAN DOCTORS

UNITED EUROPEAN  
GASTROENTEROLOGY  
ueg

University  
of Essex



VisualTEAF  
Proyectos Solidarios

WORLD  
HEART  
FEDERATION

nexcuse

**Ms Ursula von der Leyen**, European Commission President

**Mr Frans Timmermans**, Executive Vice-President of the European Commission for the 'European Green Deal'

**Ms Stella Kyriakides**, European Commissioner for Health and Food Safety

**Mr Janusz Wojciechowski**, European Commissioner for Agriculture Brussels

**Mr Thierry Breton**, European Commissioner for Internal Market

**Mr Didier Reynders**, European Commissioner for Justice

**Mr Virginijus Sinkevičius**, European Commissioner for Environment, Ocean and Fisheries

**Ms Margrethe Vestager**, Executive Vice-President of the European Commission for 'A Europe fit for the Digital Age'

**Mr Rytis Martikonis**, Chair, Regulatory Scrutiny Board

**Ms Claire Bury**, Deputy Director General for Food Sustainability Responsible for Directorates E, F and G (SANTE.DDG2)

**Mr John Ryan**, Deputy Director General for health responsible for Directorates B, C and D (Sante B)

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19 May 2023

**Subject: Civil society alliance calls for labelling solutions which respond to European citizens' right to information: ON label**

Dear Ms von der Leyen,

Dear Executive Vice-Presidents, Commissioners, Chair of the Regulatory Scrutiny Board, Deputy Director Generals,

We, the undersigned civil society representing a large number of public health organisations, medical and scientific societies, and patient groups, would like to reiterate our position regarding the legislative proposal on alcohol labelling, as part of the **revision of the Food Information to Consumers (FIC) EU Regulation No 1169/2011**.

Our understanding is that the impact assessment supporting the revision of the food labelling rules under FIC, which includes labelling of alcohol beverages, is not finalised. Our fear is that the data gathering exercise as part of preparation for the proposal, including the impact assessment, is unduly influenced by commercial operators. We are very concerned that this important legislation will not see the light of day before the end of the current mandate. This would be a missed opportunity to ensure that consumer needs are properly taken into consideration and to make a positive impact on European citizens' right to information and public health protection. On this occasion, we would also like to express our concern with the delay of this proposal which, according to the Beating Cancer Plan's implementation roadmap<sup>1</sup>, was expected to be adopted by the end of 2022.

Alcohol is the causal factor for more than 200 diseases and conditions, and it has been classified by the International Agency for Research on Cancer (IARC) as a Group 1 human carcinogen since 1988<sup>2</sup>. In terms of cancer prevention, evidence suggests that there is no amount which can be considered

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<sup>1</sup> Europe's Beating Cancer Plan: Implementation Roadmap, European Commission (2022)  
[https://health.ec.europa.eu/system/files/2022-01/2021-2025\\_cancer-roadmap1\\_en\\_0.pdf](https://health.ec.europa.eu/system/files/2022-01/2021-2025_cancer-roadmap1_en_0.pdf)

<sup>2</sup> Alcohol drinking, IARC Working Group, Lyon, 13-20 October 1987.  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6421508/>

safe for consumption. In the WHO European Region, half of all alcohol-attributable cancers are actually caused by 'light' to 'moderate' patterns of consumption<sup>3</sup>.

As the name of the FIC regulation itself suggests, the goal of this legislation is to ensure that labelling of food and drinks as well as of alcoholic beverages, is performed in a way that is informative to consumers. As it currently stands, consumers are lacking basic nutrition information about the product they are about to buy and consume. In fact, unlike any other food or drink product, alcoholic beverages containing above 1.2% of alcohol by volume currently lack any information on their labels about their energy value (expressed in kcal/KJ), full nutrition declaration, and list of ingredients. **The Commission has already acknowledged the absence of any objective rationale for this exemption in a late report from 2017 to the European Parliament and the Council<sup>4</sup>.**

In a Commission consultation on the revision of the FIC regulation in 2022, more than two-thirds of all respondents, including those from groups with an economic interest in opposing labelling, agreed that consumers should be given ingredient and nutrition information for alcoholic beverages<sup>5</sup>. **On-label provision of this information was overall the preferred option**, with particularly strong support amongst public health NGOs, academia/research institutes as well as consumers organisations, whilst this type of provision was not favoured by economic operators, whose preferred option was off-label. **This clearly depicts the polarisation of the debate.**

**On-label nutrition and ingredient information is the most appropriate and most practical way to respect consumers' right to know.** It ensures that consumers have immediate access to this information (both at the point of purchase and right before consumption), it allows for easier comparison between products, and it requires no additional tools or skills. Results from the 2021 Digital Economy and Society Index (DESI) have shown that 44% of people in the EU lack basic digital skills<sup>6</sup>. Furthermore, not all European citizens own a smartphone. Scanning a QR code also requires access to data connection, and it is subject to good data coverage. Digital labelling has the potential to widen health inequalities even further, only allowing a certain set of the population to access nutrition information.

Finally, the on-label indication of nutrition and ingredient information for alcoholic beverages should not prove difficult to implement, since **no and low alternatives** (currently defined as alcoholic beverages containing below 1.2% of alcohol by volume) **are already mandated to display this information on label**. In the food business sector, small and medium-sized enterprises (SMEs) have already been complying with nutrition labelling requirements (energy value, full nutrition declaration, and list of ingredients) since 2016<sup>7</sup>, proving that this can also be achieved by small and medium producers.

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<sup>3</sup> Health and cancer risks associated with low levels of alcohol consumption, Anderson et al. (2023), The Lancet, vol. 8, n. 1, E6-E7 [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(22\)00317-6/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(22)00317-6/fulltext)

<sup>4</sup> 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 COM/2017/058, European Commission (2017) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52017DC0058>

<sup>5</sup> Factual summary report of the online public consultation in support of the revision of the Food Information to Consumers regulation, European Commission (May 2022) [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12749-Food-labelling-revision-of-rules-on-information-provided-to-consumers/public-consultation\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12749-Food-labelling-revision-of-rules-on-information-provided-to-consumers/public-consultation_en)

<sup>6</sup> Shaping Europe's digital future – Digital skills and jobs, European Commission (2021) <https://digital-strategy.ec.europa.eu/en/policies/digital-skills-and-jobs>

<sup>7</sup> Food safety - Food information to consumers – legislation, European Commission [https://food.ec.europa.eu/safety/labelling-and-nutrition/food-information-consumers-legislation\\_en](https://food.ec.europa.eu/safety/labelling-and-nutrition/food-information-consumers-legislation_en)

We would therefore like to invite the Commission to:

- Respect consumers' right to information by issuing a proposal for mandatory on-label provision of energy value, full nutrition declaration, and list of ingredients for all alcoholic beverages (wines, beer, and spirits) as soon as possible.
- Ensure that basic nutrition information is available on label for consumers to access easily at all times and without the need of additional tools and skills.

Labelling of alcoholic beverages is an important measure to implement as part of a broader strategy to fight alcohol related harm, alongside other effective policy tools proposed in the European Beating Cancer Plan, the WHO SAFER recommendations<sup>8</sup> and the WHO European Framework for Action on Alcohol 2022-2025<sup>9</sup> which was unanimously adopted by all WHO European Members States at the WHO 72<sup>nd</sup> Regional Committee Meeting in Tel Aviv in 2022.

We appreciate you are very busy but hope that you will be free to meet a small delegation from the undersigned in the not too distant future. If you are willing to see us, perhaps through your secretary, we could find a mutually convenient time to meet.

We look forward to your response.

Sincerely,



Florence Berteletti  
Eurocare Secretary General



Dr Peter Rice  
Eurocare President



Dr Nikhil Gokani  
Chair of the Eurocare  
Alcohol Labelling and  
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#### Signatories:

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<sup>8</sup> The SAFER Initiative – A world free from alcohol related harm, WHO (2018) <https://www.who.int/initiatives/SAFER>

<sup>9</sup> European Framework for Action on Alcohol 2022-2025, WHO Europe (2022)

<https://www.who.int/europe/publications/m/item/european-framework-for-action--on-alcohol--2022-2025>

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