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On 10 November 2018, the CPME Board adopted the 'CPME Policy on Alcohol Labelling' (CPME 2018/055 FINAL).

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## CPME Policy on Alcohol Labelling

*The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.<sup>1</sup>*

Building on its previous policies on healthy lifestyles, CPME reaffirms its commitment to contributing to the fight against alcohol-related harm and encourages European doctors to act, both in direct patient contact and through their national medical associations.

### Alcohol Labelling in the EU

EU Regulation 1169/2011 on the provision of food information to consumers demands that all foodstuffs display ingredients and nutritional values on their packaging.<sup>2</sup> However, alcoholic beverages containing more than 1.2 % by volume of alcohol are exempted from the mandatory declaration of ingredients and nutritional values. This exemption can be traced back to 1978 but the reasons for it are not clear.<sup>3</sup> The Regulation requested the European Commission to prepare a report addressing whether alcoholic beverages should be covered by the requirement and the rationale for any possible exemptions.

The Commission report<sup>4</sup> requested by the Regulation was adopted in 2017. It states that objective grounds have not been identified that would justify the absence of information on ingredients and nutritional information on the labelling of alcoholic beverages. Moreover, it refers to a study revealing that most consumers never or rarely use off-label information sources to access

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<sup>1</sup> CPME is registered in the Transparency Register with the ID number 9276943405-41. More information about CPME's activities can be found on [www.cpme.eu](http://www.cpme.eu).

<sup>2</sup> [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](#) (European Parliament & European Council, 2011)

<sup>3</sup> [Council Directive 79/112/EEC of 18 December 1978 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer](#) (Council of the European Union, 1978)

<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 nutritional declaration of alcoholic beverages](#) (European Commission, 2017)



information on the nutritional values and ingredients of alcoholic beverages.<sup>5</sup> The Commission invited the alcohol industry to respond to consumers' expectations and present a self-regulatory proposal that would cover the entire sector of alcoholic beverages.

In 2018, the European alcoholic beverages sector submitted a proposal to self-regulate the provision of nutritional information and ingredients listing. The proposal suggested data being provided off-label and/or on label depending on the alcohol sector.<sup>6</sup> Because of the sectoral differences, the proposal includes sector-specific annexes for beer, cider, spirits and wine.

### **Consumer's right to know**

CPME believes that consumers have a right to know what they are drinking. The list of ingredients and the nutritional values declaration per 100 ml are essential information to help consumers to make more informed and healthier choices. The nutritional values declaration should be composed of energy value (kJ/kcal), fat (g), saturated fat (g), carbohydrates (g), sugars (g), proteins (g) and salt (g). For the greatest benefit, this information should be available directly and legibly on the label, not only online.

Providing comprehensible nutritional information such as energy content allows consumers to better monitor their diets and makes it easier for them to maintain a healthy lifestyle<sup>7</sup>. Alcohol contains a considerable number of calories with an energy content of 7.1 kilocalories per gram.<sup>8</sup> Alcoholic beverages are also rich in sugar, which contains 4 kilocalories per gram, and frequently have added sugars. This may be unclear to consumers, if there is not sufficient information on the label.

CPME believes that self-regulation is not an appropriate way to protect the population from alcohol-related harm. It has not succeeded in improving public health outcomes so far. Voluntary commitments are often vague, lacking credible enforcement mechanisms and difficult to monitor<sup>9</sup>. The 2018 proposal by the industry lacks any added value.

CPME believes that labels should be considered an important part of a comprehensive strategy to provide information and educate people to prevent and reduce alcohol-related harm.

CPME also wishes to endorse the World Medical Association (WMA) Declaration on Alcohol which recommends increasing public awareness of harmful alcohol consumption through mandatory

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<sup>5</sup> [Consumer insights - knowledge of ingredient and nutrition information off-label information and its use](#) (GfK Belgium, 2014)

<sup>6</sup> [Joint self-regulatory proposal from the European alcoholic beverages sectors on the provision of nutrition and ingredients listing](#) (AICV, The Brewers of Europe, CEEV, CEVI, Copa-Cogeca, EFOU & Spirits Europe, 2018)

<sup>7</sup> [Alcohol labelling: A discussion document on policy options](#) (WHO – World Health Organization Europe, 2017)

<sup>8</sup> [What's in this drink? Eurocare's position on ingredients and nutritional information](#) (European Alcohol Policy Alliance, 2018)

<sup>9</sup> [Briefing paper: Self-Regulation: A False Promise for Public Health?](#) (EPHA – European Public Health Alliance, 2016)



product labelling that clearly states alcoholic content in units, advice on recommended drinking levels and a health warning, supported by public awareness campaigns.<sup>10</sup>

### **Recommendations**

CPME calls on the European Commission and the European co-legislators to end the exemption of alcoholic beverages from EU Regulation 1169/2011. To protect the health of the population, alcoholic beverages should be required by law to list their ingredients and nutritional values, and to display those values legibly on the product's label. However, ingredients and nutritional information should not be displayed in a way that could suggest that the product in question is healthy (low calories, organic sugar, vegan etc.).

CPME also supports the right of national governments to take initiatives to increase public health by including additional labelling information. This may include information on allergens but also different health warnings, for example on legal age limits, drinking during pregnancy, drinking and driving, and the link to cancer and other diseases. It should be ensured that these warnings are legibly displayed next to the information on the ingredients and nutritional values.

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<sup>10</sup> [WMA Declaration on Alcohol](#) (WMA – World Medical Association, 2017)