

The Institute of Alcohol Studies

Response, relating equally to the whole UK, to the Consultation on options for improving information on the labels of alcoholic drinks to support consumers to make healthier choices in the UK

We do not understand why this consultation has been necessary. In 2008, the Government asked in a consultation, “If there continues to be slow progress in implementing a voluntary labelling scheme, should the Government take the next steps to make it a legal requirement to include health and unit information on all bottles and cans?” Responses were strongly in favour of introducing such legislation in this case. Evaluations of the voluntary agreement on alcohol labelling conducted in 2008 and 2009 found low compliance and only modest improvement between these two time points. Even counting labels that are not strictly compliant but in the spirit of the agreement as acceptable; even including companies that merely intend to implement the agreement but have not yet done so; even assuming that ‘own label’ products will comply; even with these various measures that inflate the estimate of compliance, it is still predicted that compliance will fall substantially short of the relatively modest target of 50% of the market.

There can be no doubt that there continues to be slow progress in implementing the voluntary labelling scheme. The government should now respect the wishes of those who responded to the consultation in 2008 and introduce mandatory requirements on alcohol labelling. We consider Option 3 to be the only consistent course of action for the Government at this stage.

Q1 IAS supports Option 3, legislating for a mandatory requirement on labelling. We would also like to see equivalent health and unit information made available to on-trade customers.

Q2 We support the proposed three core requirements for content. With the long-term goal of raising awareness, consistency is important and these messages are already present on many products. Furthermore, it could be argued that those companies who have introduced unit and health information to the agreed standards should not be required to change their labelling again.

Regarding the optional signposting to a source of additional information, we are not happy with Drinkaware being presented as a reliable, independent source of health information. As an organisation funded entirely by the drinks industry, and closely related to the drinks industry Drinkaware is not sufficiently distanced from industry to function as a fully independent provider of health advice. Health information on the Drinkaware.co.uk website is currently surrounded by a wealth of trivial detail and not at all easy to access. We would prefer to see the website www.drinking.nhs.uk used for this purpose.

- Q3** The current agreement requires that the message should be legible and should stand out from other messaging. This should be clarified with reference to the Food Standards Agency Clear Food Labelling Guidance notes.
- Q4** We consider that the proposed content is both reasonable and proportionate.
- Q5** It would be desirable to include additional health warnings, but in the context of the 2007 MoU, we accept that the priority at present is to ensure provision of unit and health information, as set out in that agreement.
- Q6-8** N/A
- Q9** In light of the fact that the voluntary agreement has already been in place for three years, we consider two years after making regulations to be an unnecessarily long implementation period. Ideally we would like to see full compliance by December 2011.
- Q10** We do not consider that any classes of product should be exempt from the regulations. The government may wish to exempt small producers, but it is not the role of IAS to comment on this.
- Q11** N/A
- Q12** As an organisation dedicated to providing accurate information about alcohol and associated health risks, the presence of consistent, clear unit and health information on labels would provide significant support to our educational goals.
- Q13-16** N/A

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