

**WHAT'S NOT ON THE BOTTLE?
BRIEF OVERVIEW OF STATE OF PLAY IN ALCOHOL LABELLING**



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The European Alcohol Policy Alliance (EUROCARE)

The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governmental and public health organisations with 48 member organisations across 21 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in research and advocacy, as well as in the provision of information to the public; education and training of voluntary and professional community care workers; the provision of workplace and school based programmes; counselling services, residential support and alcohol-free clubs for problem drinkers; and research and advocacy institutes.

The mission of Eurocare is to promote policies to prevent and reduce alcohol related harm, through advocacy in Europe. The message, in regard to alcohol consumption is “less is better”.

ALCOHOL - A CAUSE FOR ACTION

Alcohol is a key health determinant and is responsible for 7,4% of all ill-health and early death in Europe, which makes it the third leading risk factor after tobacco and high blood pressure. Alcohol harm is disproportionately high among young people (115 000 deaths per year) and harms others than the drinker. 5 million Europeans are born with birth defects and developmental disorders because of their mother drinking during pregnancy. 5-9 million children are living in families adversely affected by alcohol. 10.800 traffic deaths and 20.000 murders involve alcohol in the EU each year. Furthermore, binge drinking among young people is on the rise, with most countries showing an increase from 1995.

Europe plays a central role in the global alcohol market, responsible for a quarter of the world's total production. However, the total tangible cost of alcohol to EU society in 2003 was estimated to be €125 billion (€79bn - €220bn) or €650 per household, equivalent to 1,3% GDP. The costs includes areas such as traffic accidents €10bn, crime damage €6bn, crime defensive €12bn, crime police €15bn, unemployment €14bn, health €17bn, treatment/prevention €5bn, mortality crime €36bn, absenteeism €9bn. Although these estimates are subject to a wide margin of interpretation, they are likely to be an underestimate of the true gross social cost of alcohol (excluding benefits)¹.

SUMMARY

Eurocare believes labelling should be part of comprehensive strategy to provide information and educate consumers about alcohol and should be part of integrated policies and programmes to reduce the harm done by alcohol.

¹ All data taken from: Anderson P and Baumber B. (2006) *Alcohol in Europe*. London: Institute of Alcohol Studies

Taking into account that majority of developments seemed to have been stopped at very early stage, unintentionally this review places disproportionate emphasis on alcohol industry in the area of labelling.

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INTRODUCTION: WHY DOES EUROCARE CARE ABOUT ALCOHOL LABELS?

Product labels can serve a number of purposes, providing information about the product to the consumer, enticing the consumer to buy the product and warning consumers of dangers and health risks from the product.

Providing full information about the product enables consumers to make informed choices and ensures that the consumers know what is in the product they are investing their money into.

Listing the ingredients contained in a particular beverage alerts the consumer to the presence of any potentially harmful or problematic substances. Even more importantly, providing the nutritional information such as calorie content allows consumer to monitor their diets better and makes it easier to keep a healthy lifestyle. Unfortunately, today sulphite is the only allergen required to be listed compulsorily although many other allergens can be present.

One of the objectives of the public bodies should be to protect people effectively from the risks and threats that they cannot tackle as individuals. Last year the European institutions have passed legislation that requires food and any other soft drinks i.e. water to list its nutritional information and ingredients. However, alcohol was exempted from this provisions/

Allowing the alcohol industry not to provide full information on the labels of their products is yet another missed opportunity for reducing alcohol related harm.

Eurocare believes that alcohol producers should provide information not only on ingredients, but also about the risks associated with alcohol consumption: damages to health (liver cirrhosis, cancers) risk of dependence, dangers associated with drinking alcohol during pregnancy, when driving, operating machinery and when taking certain medication.

Labelling should be part of a comprehensive strategy to provide objective information. Consumers have the right to know of the ingredients contained in beverages.

A MISSED OPPORTUNITY: PROVISION OF FOOD INFORMATION TO CONSUMERS LEGISLATION IN THE EU

On July 6 the European Parliament adopted the compromise with the Council on the proposal for a regulation on the Provision of Food Information to Consumers with 606 votes in favour, 46 against and 26 abstentions (regulation No 1169/2011)

The vote was a culmination of some very heated debates over a number of contentious issues.

Alcohol (beverages containing more than 1,2% by volume) has been exempted from the obligation to list its ingredients and provide nutrition information; consumers will still be unable to know exactly what is in wine, beer or spirits or how many calories they are consuming.

By 13 December 2014, the Commission shall produce a report concerning the application of this regulation and address whether alcoholic beverages should in future be covered, in particular, by the requirement to provide the information on the energy value and the reasons justifying possible exemptions, taking into account the need to ensure coherence with other relevant Union policies. In this context the Commission shall consider the need to propose a definition of 'alcopops'¹.

After the vote, Mr. John Dalli, the EU Commissioner for Health and Consumer Policy, declared: *'I also regret to see that alcoholic beverages have been at this stage exempted from the ingredient and nutrition labelling requirements. I will however strive to ensure that we strike the right balance when we re-examine the issue in the near future'*.

This was echoed by one of the shadow Rapporteur working on the file Carl Schlyter (Greens/EFA) *'(...) we are very unhappy about full exemption for alcoholic beverages especially since many are unaware of the high calorie content of alcoholic drinks'*.

In relation to the health warning discussion it is worthy of note that energy drinks with high caffeine content must contain front of pack warning for children and pregnant women with the following text: *'High caffeine content. Not recommended for children or pregnancy or breast-feeding women'*.

This follows the logic of ensuring the safety of usage and protecting the consumers from side effects of products. Unfortunately, the same logic was not applied in relation to alcoholic beverages. It is interesting to observe that commonly aired concerns about prohibition of harmonisation on grounds of public health or distraction of common market within the EU seemed to have been forgotten in this case by the legislature but utilised for alcoholic beverages.

WHAT'S NEXT? STATE OF PLAY AND SOME LESSONS LEARNED

European Union institutions have perfectly positioned to coordinate common efforts to inform consumers of both the composition as well as harmful effects of alcohol.

Some alcohol producers are on their own initiative, putting statements encouraging consumers to use alcoholic beverages responsibly or in moderation.

SABMiller the world's second largest brewer made a commitment that by December 2011, it will put responsible drinking message on the packaging labels of their products and marketing materials. SABMiller has submitted this also as a commitment in the framework of the EU Alcohol and Health Forum as it strongly believes that *'people should receive accurate and balanced information to help them make a choice'*ⁱⁱⁱ

Similarly the spirits producers under the umbrella of the European Spirits Organisation (CEPS) have submitted responsible drinking messages on labeling as its commitment to the EU Alcohol and Health Forum. This has comprised of initiatives such as: Pernod Ricard pregnancy logo (as in France) across brands and markets; Bacardi Martini responsible drinking message and in some countries i.e. France unit labeling etc. The main objective is for all the spirits producers to drive their customers to a consumer information website that has been developed at national level to inform consumers on risks related to alcohol abuse and misuse (tips for responsible drinking, tool to monitor consumption, etc). These web addresses should be displayed on labeling and advertising.

However, it should be noted that majority of the messages employed by the alcohol producers are too generalised to qualify as health warning labels or drinking guidelines.

Furthermore, it needs to be emphasised that this diverts consumers' attention away from the product in their hands and onto website. This convoluted mechanisms makes it difficult for

people to access information also allows alcohol brands to avoid any negative association with alcohol- related harms.

Can alcohol industry label itself? Assessment of the United Kingdom Responsibility Deal

Over the years alcohol industry has been strenuously opposed the introduction of any measures that would potentially change consumption pattern in the 1970s and 1980s they opposed even random breathe testing'sⁱⁱⁱ

In May 2007 UK Government has entered a voluntary agreement with the alcohol industry which was designed to introduce health warning labels on alcoholic drink containers by the end of 2008.

Such labels were required to include:

- the drink's unit content
- the recommended Government sensible drinking guidelines '*UK Chief Medical Officers recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily*'
- the website address of the independent charity, the Drinkaware Trust- www.drinkaware.co.uk
- one of the three following messages as a heading:
 - Know your Limits
 - Enjoy Responsibly
 - Drink Responsibly
- Alcohol in pregnancy message as agreed by the UK Chief Medical Officers '*Avoid alcohol if pregnant or trying to conceive*'; the preference was for this text to be used rather than an alternative circular logo (diagonal line being superimposed on an image of a pregnant woman holding a glass)

By April 2009, and independent monitoring showed that only 15% of drinks have carried messages required^{iv} . This study looked into 62 separate features which then were diagnosed to determine to what extent the voluntary agreement has been followed. Generally there was a great number of inconsistencies in the content, format and location of units and health information. A UK unit per container information was the most frequently implemented element; the second most frequent health warning element was a reference to the website address of the Drink Aware Trust (www.drinkaware.co.uk).

In terms of the responsible drinking message, it often failed to comply with the voluntary labelling agreement. On a number of occasions (22.5%) alternative wording was employed, often the word 'please' and the brand's name were added. Examples of some alternative messages included:

- Always enjoy *brand name* wines in moderation
- Drink *brand name* Responsibly
- Best Enjoyed Responsibly
- Member of the *brand name* Group promoting sensible drinking
- Please drink *brand name* responsibly
- Please take as much care enjoying our beers as we do brewing them. Drink sensibly
- Remember, you can have too much of a good thing
- Respect alcohol. Respect yourself

The sensible drinking guidelines information '*UK Chief Medical Officers recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily*' has been implemented in the agreed format only in 2.4% of the samples. In terms of graphics and visual presentation of health warnings they took on average only 1.2% of the total printable area. The survey also found that there appeared to be little consistency on to the presentation, content and format of health warnings. Furthermore, poor tonal contrast was believed to affect legibility i.e. shiny or metallic backgrounds. It was also reported that in some cases health information was in a smaller font or different orientation to other information on the package.

Despite these finding on 15th March 2011 the UK Government announced a Public Health Responsibility Deal which included a continuation of self-regulatory scheme. It composed of pledge from the alcohol industry to take action to support achievement of over 80% (by end of 2013) market coverage for agreed health information on alcohol labels^v.

It is not in the alcohol industry's interest for health warnings labels to change behaviour and reduce consumption. Yet time and time again, the governments turn to the industry to implement public health policies. How can 'please enjoy/ drink responsibly' be regarded as sufficient labelling information?

WOULD IT WORK? A BRIEF REVIEW OF RESEARCH AND STUDIES

While discussing effectiveness it should be noted that best studied experience with alcohol warning labels is from the United States (US). However, the US health warning label is fixed rather than rotating, and has not changed since its introduction in 1989; it is relatively lengthy message which is usually in small and hard to read print.

Below are summarised main findings from a number of articles regarding labelling, which could be of relevance for policy discussions.

Salience of good design

Getting noticed and attended to, are the first requirements of an effective warning, it follows that its design determines the potential to influence behaviour^{vi}

The major barrier to the effectiveness of health warning statements is that they are not noticeable

- too small
- not prominently located on containers
- do not stand out on a bottle or can^{vii}

An effective warning consist of four message components each of which serves a different purpose: (1) signal word to attract attention, (2) identification of the hazard, (3) explanation of consequences if exposed to hazard, (4) directives for avoiding the hazard.

Visual warning can be enhanced using (1) large, bold print (2) high contrast, (3) colour, (4) borders, (5) pictorial symbols, and (6) special effects like flashing lights.

Bold type is preferred because of its greater contrast with most backgrounds. Warnings printed in red (compared to black) led to improved noticeability, warnings sign with thick, colourful borders are more likely to attract attention, compared to similar signs with thin or no borders.

Factors that aid in the recall of safety information include repetition, warning relevance, pictorials and the presence of injury statistics^{viii}

Furthermore, rotating numerous warnings is a mean of communicating facts and multiple hazards that could not be effectively communicated on a single label due to limited surface and space. Rotation of multiple warnings is one method that might be chosen under some circumstances to convey a set of lesser known facts and hazards over time and across purchases^{ix}.

Promoting discussions

It has been noted that the US health warning labels have prompted discussions about the dangers of drinking, steadily increased awareness of the labels, and there is evidence of increased public support for alcohol labeling by the US public following its introduction^x.

Surveys of the general populations of US and Ontario, 1989 to 1994 reported that respondents have taken part in conversations about risks of alcohol consumption from before the introduction of the labels to the year afterwards^{xi}

Similarly, pregnant women who saw the labels were more likely to discuss the issue; in addition a 'dose-response' effect was found such that the more types of warnings the respondents had seen (on adverts at point of-sale, in magazines and on containers) the more likely they were to have discussed the issue^{xii}.

In France comparable results were found in relation to introduction of the pictogram in 2006. Study of public awareness regarding dangers of drinking alcohol during pregnancy has indicated positive evolution in terms of change in social norm to 'no alcohol during pregnancy'.^{xiii}

Raising awareness, changing attitudes

It could plausibly be argued that where relatively strict warning label regulations have been used, there has indeed been a shift towards regarding alcohol as more problematic and heavier drinking as less 'normalised'^{xiv}

Furthermore, warning label message might serve to legitimate a socially challenging intervention, for example increasing behaviours that aim to reduce the likelihood of an inebriated person getting behind the wheel^{xv}.

Labels need to be regarded as an opportunity for impact over time, rather than setting the expectation that they will affect immediate behavioural change. Existing low awareness of the health consequences of alcohol and poor perception of the recommended safe drinking levels, suggests that behaviour change with respect to alcohol consumption will take some time^{xvi}.

Complexity of fear arousal effects

Fear arousal may prompt denial that undermines precautionary motivation. Defensive responses may result in inadequate processing of precautionary instructions or the systematic rejection of arguments prompting precautions.

Findings suggest that behaviours focussed on early detection of health problems are best promoted by loss frames (e.g. Failing to control your drinking behaviour limits your ability to detect dangerous situations) whereas prevention behaviours are best promoted by gain framed (e.g. 'people who limit their dinking are decreasing their risk of getting cancer')

The more risky detection actions will be most attractive when potential losses are highlighted whereas the less risky preventative behaviours will be promoted best by emphasising potential gains. Research emphasises the importance of combining fear appeals with specific instructions and prompts to action planning^{xvii}

Lessons learned from tobacco labelling

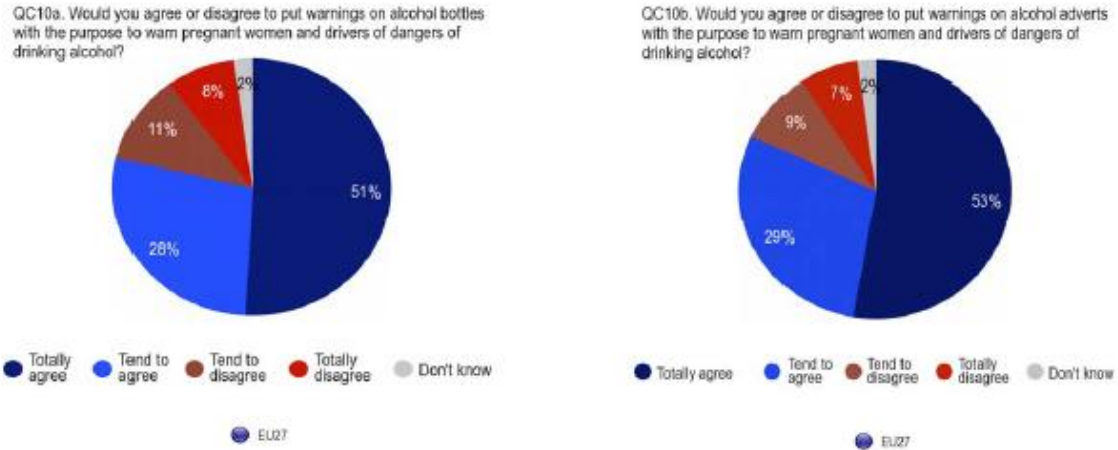
The tobacco labelling experience offers strong evidence that warning labels can be effective not only in increasing information and changing attitudes, but also in affecting behaviour.

Results from the International Tobacco Control evaluation also support the effects of pictorial labelling. At least one- quarter of respondents from all four countries reported that the package warnings had made them more likely to quit, although Canadian smokers were significantly more likely to report cessation benefits from the warnings than smokers in the other three countries that have text only warnings^{xviii}

Cigarette packages warnings have had most critical influence in a more indirect manner, such as by influencing non-smokers to use social ad peer pressure to encourage smokers to stop- an important influence of the warnings that might be very difficult to assess^{xix}.

WHAT DOES THE PUBLIC SAY?

Eurobarometer 2010 reports that overwhelming majority **of the European Union population (79%) would agree with putting warnings on alcohol labels** to warn pregnant women and drivers of the dangers of drinking alcohol. Furthermore the support for health warning messages on advertisements reaches 83% across the EU^{xx}.



OVERVIEW OF HEALTH WARNINGS

Currently, only France introduced a mandatory health warning message. In a number of countries there are health warning requirements for advertisements. The following summary was produced using the International Center for Alcohol Policies data^{xxi}

European Union

Country	Mandated or Voluntary	Packaging or Advertisements	Text	Other requisites
Bulgaria	Mandatory	Packaging		The law provide notes about risks for the health on the labels of alcoholic beverages
Cyprus				Health warnings are present
Estonia	Mandatory	Advertisements	'Attention! This is alcohol. Alcohol may harm your health'	Legislation introduced in March 2008 requires health warnings on all alcoholic beverages advertising
France	Mandated	Packaging	'Drinking alcoholic beverages during pregnancy even in small quantities can	Packaging of all beverages alcohol products sold or distributed (including for

			<p>have grave/serious consequences for the health of the baby'</p> <p>OR usage of the pictogram</p> 	<p>free as promotion) in France must have at least one of the two health messages recommending that pregnancy women do not drink alcohol. The health warning must:</p> <ul style="list-style-type: none"> - appear in the same visual field as the obligatory labelling on the alcohol content -be written on a contrasting background in a manner that is visible, reliable, clear, understandable, and indelible
Germany	Mandated	Packaging	'Nor for supply to persons under 18, clause 9 Protection of Minors Act'	The health warning must be displayed on the packaging in the same typeface, size, and colour as the brand or trade name or, where there is neither, as the product designation and on bottles must be displayed on the front level.
Italy	Voluntary			Health warnings are not legally required on alcohol advertisements but sometimes they are introduced on a voluntary basis
Latvia		Advertisements		
Lithuania		Advertisements; outdoor billboards		
Poland	Mandatory	Advertisements	'1/2 litre of beer contains 25 gram of pure alcohol. Even such amount is harmful for pregnant women and dangerous for drivers' or '1/2 litre of beer contains 25 gram of pure alcohol. Sale to people under 18 years is a crime'	<p>Advertisements of beer</p> <p>They should be placed in the upper part of the advertisements and consists 20% of the advertising surface; they need to have different colours than the rest of the advert, they are red print on white background or white font on red background in capital</p>

				letters.
Slovenia	Mandatory	Packaging	'Not suitable for Children'	
Spain	Voluntary	Advertisements	'Drink moderately. It's your responsibility'	
Sweden	Mandatory	Advertisements (newspaper)	<p>'Alcohol can damage your health'</p> <p>'Alcohol is addictive'</p> <p>'Alcohol is dependence-producing'</p> <p>'Alcohol can cause nerve and brain damage'</p> <p>'Alcohol can cause damage to the liver and the pancreas'</p> <p>'Alcohol can cause stroke and cancer'</p> <p>'Every second driver who dies in a single-vehicle traffic crash is under the influence of alcohol'</p> <p>'One in two drivers killed in single- vehicle accidents in traffic is under the influence of alcohol'</p> <p>'Half of all who drown have alcohol in their blood'</p> <p>'Alcohol in connection with work increases the risk of injuries'</p> <p>'Alcohol consumption during pregnancy can harm the baby'</p> <p>'Children who get alcohol at home get drunk more often than other children'</p> <p>'To start drinking at an</p>	<p>Swedish warning labels on advertisement seem to the single example in the alcohol field of rotating warnings</p> <p>The health warnings are required to:</p> <ul style="list-style-type: none"> -be in black letters -area compromising 1/8 of the space for advertisement <p>Alcohol ads in printed media are allowed for alcoholic beverages with up to 15% alcohol, 20% of the alcohol ads in the printed media have to consist of a warning label. Same rules apply for alcohol ads on the Internet, except that it is allowed to market beverages that consist of more than 15% alcohol.</p>

			early age increases the risk for alcohol problems'	
United Kingdom	Voluntary	Packaging	'The Chief Medical Officer recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily' And one o the three following messages: 'Know your limits', 'Enjoy Responsibly' or 'Drink Responsibly'	Labels also include the website address of the Drinkaware Trust For more detailed description please see page 8

Worldwide

The following summary was produced using the International Center for Alcohol Policies data.

Country	Mandatory or Voluntary	Content
Argentina	Mandatory	'Drink in moderation' 'Sale prohibited to persons under 18 years of age'
Brazil	Mandatory	'Avoid the excessive consumption of alcohol'
Canada	Voluntary only partially mandatory	Health advisory or warning labels are not required however since February 2005, licensed establishments in Ontario have been required to display specific warning signs about the risk of alcohol use in pregnancy ^{xxii} The Public Health Agency of Canada recommends that women who are trying to get pregnant or are pregnant already, stop drinking. It states that there is no safe amount ^{xxiii} Yukon Territory in Canada, alcohol containers carry a warning about the dangers of drinking alcohol in pregnancy In Canada health warning labels in relation to dangers of drinking during pregnancy have been ongoing for lat 25 years. Four standing committees of Parliament, the Royal Commission on New Reproductive Technologies and the National Advisory Committee on Foetal Alcohol Spectrum have all recommended putting health warning labels. Nevertheless, no legislative action has been taken. ^{xxiv}
Chile	Voluntary	'[name of company] asks you to drink responsibly' 'Product for those 18 and older'
China	Voluntary	'Over drinking is harmful to health' 'Pregnant women and children shall not drink'
Colombia	Mandatory	'An excess of alcohol is harmful to your health' 'This product is harmful to the health of children and pregnant women'

		'Prohibited for sale to minors'
Costa Rica	Mandatory	'Drinking alcohol is harmful to your health' 'Alcohol abuse is harmful to your health'
Ecuador	Mandatory	'Warning: The excessive consumption of alcohol limits your capacity to operate machinery and can cause harm to your health and family' 'The sale of this product is prohibited for those younger than 18 years old' The label must be in form easy to read; use colours that distinguish the text from the background; occupy 10% of the labels surface
El Salvador	Mandatory	On advertisements: 'The excessive consumption of this product is harmful to health and creates addiction. Its sale is banned to those under 18 years of age'
Guatemala	Mandatory	The excess consumption of this product is harmful to the consumer's health' On advertisements the following message should be broadcasted for minimum 2 second or in printed media take 10%of the as size: 'Consumption of this produce cause serious damage to health'
Honduras	Mandatory	Preventative legends must be displayed on all alcoholic beverage packaging
India (state of Assam)		Consumption of liquor is injurious to health
Japan	Voluntary	'Drinking alcohol during pregnancy or nursing may adversely affect the development of your foetus or child' 'Be careful not to drink in excess' 'Drink in moderation' Displayed in easy to read location on the container; using uniform Japanese font; at least 6 points in size
Mexico	Mandatory	'Abuse of this product is hazardous to your health' Label must be in contrasting colours Billboard often carry slogan 'Enjoy in moderation'
Russia	Mandatory	'Alcohol is not for children and teenagers up to age 18, pregnant and nursing women, or for persons with diseases of the central nervous system, kidneys, liver and other digestive organs' Health warning is obligatory for wine, vodka and other spirits
South Africa	Mandatory	'Alcohol reduces driving ability, don't drink and drive' 'Don't drink and walk on the road, you may be killed' 'Alcohol increases your risk to personal injuries' 'Alcohol is a major cause of violence and crime' 'Alcohol abuse is dangerous to your health' 'Alcohol is addictive' 'Drinking during pregnancy can be harmful to your unborn baby' Container labels for alcohol beverages must contain at least one of the 7 health messages A health warning should be: - visible; legible and indelible and the legibility thereof shall not be affected by any other matter, printed or otherwise

		<p>- be on a space specifically devoted for it, which must be at least one eighth of the total size of the container label</p> <p>Be in black on a white background</p>
South Korea		<p>'Warning: Excessive consumption of alcohol may cause liver cirrhosis or liver cancer and is especially detrimental to the mental and physical health of minors'</p> <p>'Warning: Excessive consumption of alcohol may cause liver cirrhosis or liver cancer, and especially, women who drink while they are pregnant increase the risk of congenital anomalies'</p> <p>'Excessive consumption of alcohol may cause liver cirrhosis or liver cancer, and consumption of alcoholic beverages impairs your ability to drive a car or operate machinery and may increase the likelihood of car accidents or accidents during work'</p> <p>On all spirits containers: 'Excessive drinking may cause cirrhosis of the liver or liver cancer and increase the probability of accidents while driving or working'</p>
Taiwan	Mandatory	<p>'Excessive consumption of alcohol is harmful to health'</p> <p>'To be safe, don't drink and drive'</p> <p>'Excessive drinking is harmful to you and others'</p> <p>'Please do not drink if you are a minor'</p> <p>Labels must be in a conspicuous place on the container's largest external surface</p>
Thailand	Mandatory	<p>'Liquor drinking may cause cirrhosis and sexual impotency'</p> <p>'Drunk driving may cause disability or death'</p> <p>'Liquor drinking may cause less consciousness and death'</p> <p>'Liquor drinking is dangerous to health and causes less consciousness'</p> <p>'Liquor drinking is harmful to you and destroys your family'</p> <p>Health warnings:</p> <ul style="list-style-type: none"> - shall be made in pictures with 4 colors - provided that each form shall be used for 1,000 containers - if the containers are square shape, the warning pictures shall have the size of not less than 50% - if the containers are in cylindrical shape, the warning pictures shall have the size of not less than 40% of the total space of the containers - printed in bold characters <p>For more information on Thailand please see page 21</p>
United States	Mandatory	<p>'GOVERNMENT WARNING: (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems'</p> <p>The health warning statement should:</p> <ul style="list-style-type: none"> - appear on the brand label or separate front label, or on a back or side label - be separate and apart from all other information

		<ul style="list-style-type: none"> - be readily legible under ordinary conditions - appear on a contrasting background - be firmly affixed to the container - the words "GOVERNMENT WARNING" must appear in capital letters and in bold type - follow the minimum size guidelines as specified for containers of various sizes <p>USA wine must carry a statement contain sulphites if they are used in winemaking</p> <p>California, as the result of law passed by referendum requiring the disclosure of carcinogens and teratogens in products for sale, all stores selling alcohol beverages must post a warnings sign in a prominent place. At first, in 1988 this covered only birth defects, but by 1989 it dealt also with cancer' Drinking Distilled Spirits, Beer, Coolers, Wine and Other Alcoholic Beverages May Increase Cancer risk and During Pregnancy, Can Cause Birth Defects^{xxv}</p> <p>As of 1996, 16 US states and 15 localities in other states required the posting of warning signs wherever alcoholic beverages are sold</p>
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There appears to be no consistency of format or wording, although there seems to be an international trend towards warnings specifically concerning pregnancy and drink driving.

In context of health warning labels in the recent past Australia and Thailand have attempted to introduce legislative changes that will be briefly described below.

Labelling in Australia

In 2011 there have been discussions in Australia about placing health warning messages on alcoholic beverages. They have followed publication of the government's report 'Labelling Logic' which put forward recommendations for labelling regulations in Australia. The proposed initiatives tackled similar issues to these agreed in the 'Provisions of Food Information to Consumers' legislation in the EU (please see page 6)

In relation to alcohol the panel recommended:

- Generic alcohol warning messages on packages; to be introduced only if they would be part of a comprehensive multifaceted national campaign targeting the public health problems in the society
- Suitably worded warning message about the risks of consuming alcohol while pregnant on containers and at point of sale for unpacked drinks
- Energy content to be displayed on the labels (however it did not have to be front of pack)
- Drinks that are mixtures of alcohol and other beverages would need to comply with all general nutrition food labelling requirements.

In a clearly pre-emptive move against the imposition of in-depth and health focused labelling requirements, the drinks industry announced that it will place 'consumer information messages' on its products. Drinkwise an alcohol industry supported social/ public relations body (similar to the Drinkaware Trust in the UK) declared that the liquor industry will adopt the following messages:

- Kids and Alcohol Don't mix
- Is Your Drinking Harming Yourself or Others?
- It is Safest Not to Drink While Pregnant OR pictogram



Drinkwise members, jointly account for 80% by volume of the alcohol sold in Australia. The companies who signed up for the initiative include Carlton United Breweries, which will roll out the labels on some its popular Carlton Draught and Pure Blonde brands. Diageo Australia will initially run labels on the Gordon's Gin and with time will apply, as they call it 'consumer information messages' on Smirnoff and Jonnie Walker. The labels were planned to be implemented in the next couple of weeks (as of summer 2011)

The labels proposed by the alcohol industry appeared to be a smoke screen to avoid placing important and convincing messages on the drinks. The voluntarily introduced 'consumer information messages' were ambiguous, lacked clarity and most importantly failed to inform people of the short and long term effects of drinking.

Experts agreed that the move from the alcohol industry was not tackling the crucial issues related to harm caused by alcohol, Australian Medical Association president Steve Hambleton emphasised that '*warnings should be clearer about health effects*'. Mike Daube, a spokesperson for Public Health Association of Australia commented that '*proposed warnings look more like public relations than public health*'.

Crucially such messages did not carry the same authority as warnings from independent body, Chief Executive of Cancer Council Australia Professor Ian Oliver said: '*information is missing- like the link between cancer and excessive drinking, I think it is always preferable that an external agency determines what sort of information is in the best interest of the public so they can make an informed choice about the use of something like alcohol*'

Unfortunately, the Australian authorities decided in December 2011 to require only introduction of the alcohol and pregnancy health warnings.

Health as a barrier to trade: Thailand's proposal for health warning labels

Thailand ranks fifth worldwide in alcohol consumption, with drinking levels rapidly increasing, the annual per capita consumption in 1989 was 20.2 litres and by 2003 per capita consumption had risen to 58.0 litres. The proportion of regular users, particularly daily drinkers, has increased, while the share of infrequent drinkers has gone in the opposite direction. For example beer consumption per capita has a 12 times growth during 1987 and 2003.^{xxvi} Furthermore, in Thailand, alcohol consumption is the second greatest risk factor, accounting for 8.1% of overall total burden of diseases.

In January 2010 Thailand had notified the WTO (Committee on Technical Barrier to Trade) about plans to introduce rotating pictorial warnings on alcoholic beverages contained in different types of containers.

Pressure was being exercised on the Thai government to introduce less restrictive measures as health warning labels were considered a substantive barrier to trade.

The US Government agreed to pay for a group of Thai official to travel to Washington to discuss alternatives to warning labels^{xxvii} .

EU official response to Thailand's proposal read:

In the light of the above the EU would like to invite the Thai authorities to take into consideration less trade restrictive measures or failing this, to provide clarification on which basis and evidence they consider that different, less costly and burdensome alternatives, than the indication of a pictorial health warning, would be insufficient to address the objective pursued.



แบบที่ ๒ “ดื่มสุราแล้วขับซึ่ ทำให้พิการและตายได้”

Thailand's representatives were highlighting that as much as the drinking alcohol is individual choice, the responsibility to address alcohol related problems lies in the hands of the public agencies. Thailand had already introduced strategy that consisted of several effective interventions, which are targeting different members

of the public (i.e. ban on small alcohol bottles). Thailand's representatives also reminded that pictorial messages on tobacco had better impact than health warning with text only. This is especially the case for population with low literacy rate.

It appears that negotiations are still ongoing.

CONCLUSIONS: EUROCARE POSITION

Labelling is a mean to deliver a clear message to the consumer. However, as a standalone measure, it is unlikely that warning labels will on their own, result in an overall reduction in hazardous alcohol consumption

Alcohol product labelling is an important component of a comprehensive public health strategy to reduce alcohol-related harms. Labelling provides a unique opportunity for governments to disseminate health promotion messages at the point of sale and point of consumption.

In comparison with other policy intervention to reduce alcohol related harm, such as increased taxation, labelling is regarded to have less of an immediate and visible effect. However, when examining the issues in the EU context, it is one of the few policies, where legislation at the EU level would prove feasible and in coherence with internal market principles.

More specifically, health warning labels would be at a low cost to the public spending, a direct information tool to remind of risks associated with alcohol consumption.

Adding warning labels to alcohol containers is an important first step in raising awareness and has a longer-term social utility in helping to establish social understanding that alcohol is a special and hazardous commodity

ENDNOTES:

ⁱ OJ L 304, 25.10.2011, p.30

ⁱⁱ http://ec.europa.eu/health/alcohol/docs/alcohol_lib29_en.pdf

ⁱⁱⁱ Stockwell T, Crosbie D. Supply and demand for alcohol in Australia: relationships between industry structures, regulation and the marketplace. *International Journal Drug Policy* 2001; 12:139-52

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http://www.dh.gov.uk/en/PublicHealth/Healthimprovement/Alcoholmisuse/DH_085390

^v Consultation on options for improving information on the labels of alcoholic drinks to support consumers to make healthier choice in the UK (2011) Retrieved from:

<http://www.dh.gov.uk/publications>

^{vi} Agostinelli and Grube (2002) in Stockwell T. (2006) *A Review of Research Into The Impacts of Alcohol warning Labels On Attitudes And Behaviour*. University of Victoria, Canada.

^{vii} Centre for Science in Public Interest: http://www.cspinet.org/booze/batf_labels2001_poll.htm

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^{xi} (Kaskutas and Greenfield 1992). In Stockwell T. (2006) *A Review of Research Into The Impacts of Alcohol warning Labels On Attitudes And Behaviour*. University of Victoria, Canada.

^{xii} Ibid

^{xiii} Guillemont J. (2009) Labelling on alcoholic drinks packaging: The French experience. Presentation to the CNAPA meeting, February 2009 retrieved from:

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^{xv} Tam, W. T. Et al (2010) Do Alcohol Warning Labels Influence Men's and Women's Attempts to Deter Others from Driving When Intoxicated?. *Human factors and Ergonomics in Manufacturing Service Industries*, 20 (6), 538-546

^{xvi} Jones, S.C. and Gregory, P. (2009). The impact of more visible standard drink labelling on youth alcohol consumption: Helping young people to drink (ir) responsibly?. *Drug and Alcohol Review*, 28 (3), 230-234.

^{xvii} Current models do not adequately distinguish between emotional (i.e. fear arousal) and cognitive (i.e. threat perception) response to fear appeals and, in general, are not well supported.

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