



Ms Alexandra Nicolacopoulou

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European Medical Profession's position regarding the mandatory labelling of the list of ingredients and nutrition declaration of alcoholic beverages.

Dear Ms Nicolacopoulou,

We are writing to you on behalf of the European medical profession regarding the recent publication of the report on mandatory ingredient labelling in response to the obligation set for the European Commission by Article 16(4) of Regulation (EU) 1169/2011 on the provision of food information to consumers.

We welcome the report which clearly recognises the need for improved alcohol labelling in Europe and concludes that consumers' knowledge of the nutritional value and ingredient information of alcoholic beverages is extremely limited, and that there is a significant public right to receive such information.¹

You will be aware that alcohol consumption in Europe is higher than any other region in the world, and that the associated harms of alcohol correspond accordingly. National governments have an obligation to tackle these issues but cooperation at European level is necessary due to the free movement of goods across the EU.

Consumers are entitled to know what they are consuming. The labelling of alcoholic products would significantly, and self-evidently, improve their awareness and understanding of the ingredients and nutritional information, including energy content of these products.

It is for these reasons that our organisations believe that there should be a mandatory requirement industry producers to comply with Regulation 1169/2011 and provide ingredients listing and nutritional information per 100ml.

Additionally, it should be mandatory for alcohol products to show unit information, alcohol guidelines, advice on alcohol-free days, a health warning message, and advice not to drink during pregnancy. This information should also be readily available at the point of sale and in all printed and electronic material.

Such health warnings should be mandatory, evidence-based and developed by an independent body with a standard format and design, irrespective of the brand of the alcohol beverages, to ensure better visibility and that they do not become part of the brand design. In addition, they should be accompanied by a recommendation for action, for example 'if you are concerned about your alcohol consumption, call/visit [appropriate helpline/website]'.

It is also essential that the EU develops its alcohol policies independently of the alcohol industry. This form of partnership working has, at its heart, a fundamental conflict of interest that does not adequately address public health. While the alcohol industry has a role to play, this should only be when regulations are being implemented.

We look forward to hearing from you and would be delighted to provide further details if required.

Yours sincerely



Dr Romuald Krajewski
UEMS President



Dr Jacques De Haller
CPME President



Dr Aldo Lupo
UEMO President



Dr. Sascha Reiff
EJD President

Reference

¹ <http://brewersofeurope.eu/uploads/mycms-files/documents/publications/2015/GfK%20report%20-%20CONSUMER%20INSIGHTS%20-%20FINAL.pdf>