

Alcohol Health Alliance interim research findings on alcohol labelling

February 2020

Alcohol labels mostly fail to include up-to-date health advice

The harmful use of alcohol is the leading risk factor for death, ill-health and disability among 15 to 49-year-olds in the UK.¹ Drinking is linked to over 200 conditions and diseases (including cancer, heart disease, fertility problems, stroke and mental health issues) but public awareness is low; 77% of people are unaware of the link between alcohol and breast cancer.² Recent NHS figures show that in 2018 at least 1.3 million people were admitted to hospital with a diagnosis linked to alcohol.³

The Government's Chief Medical Officers' (CMO) low-risk drinking guidelines for the UK were updated in 2016⁴ to reflect new evidence on health risks. Our research looked at 424 alcohol containers on shop shelves in October 2019 to see whether labels include this advice, which regular polling shows consumers want.⁵ Ahead of the full report (due to be published in Spring 2020) early findings show that:

- More than 70% of labels did not include the up-to-date CMO guidelines
- Nearly a quarter contained misleading, out-of-date health information

This research shows that the current approach to regulating labelling is not working. People cannot rely on the information provided on labels to give them the information they need - at the point of purchase - to make informed decisions about if, what or how much to drink.

Background

The Government's Chief Medical Officers' (CMO) low-risk drinking guidelines for the UK are that both men and women should drink no more than 14 units of alcohol per week, spread over three or more days, with several drink-free days. 24% of adults in England and Scotland regularly drink more than this.⁶

The law only requires alcohol labels to show the strength of alcohol (ABV) and the container's volume. Any other information (such as ingredients, nutritional information and health risks) is included voluntarily. This is in stark contrast to the mandatory labelling requirements for all other food and drink products, many of which are less harmful to health, which are independently regulated.⁷

The Department for Health and Social Care (DHSC) recommends that alcohol manufacturers include the current (2016) CMO guidelines on their labels.⁸ Industry-funded corporate social responsibility body the Portman Group also makes recommendations on the content and appearance of labels. Unlike the DHSC guidance, the Portman Group's 2017 guidance⁹ does not include the current (2016) CMO guidelines as part of their recommended 'three minimum elements'. However, in 2019 the Portman Group did announce that it was encouraging members to put the current guidelines on their labels.¹⁰

¹ Burton, R. et al. (2016) *The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies: An Evidence Review* <https://www.gov.uk/government/publications/the-public-health-burden-of-alcohol-evidence-review> [all URLs accessed 25.02.2020]

² https://12coez15v41j2cf7acjzaodh-wpengine.netdna-ssl.com/wp-content/uploads/2018/11/AHA_How-we-drink-what-we-think_2018_FINAL.pdf

³ <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-alcohol/2020/part-1>

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/545937/UK_CMOs_report.pdf

⁵ <https://www.alcohol-focus-scotland.org.uk/media/310812/final-our-right-to-know.pdf>

⁶ Burton, R. et al. (2016), p21 and Scottish Government (2019) 'The Scottish Health Survey 2018 edition, amended February 2020'

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2020/02/scottish-health-survey-2018-main-report-revised-edition-2020/documents/scottish-health-survey-2018-edition-amended-february-2020-volume-1-main-report/scottish-health-survey-2018-edition-amended-february-2020-volume-1-main-report/govscot%3Adocument/scottish-health-survey-2018-edition-amended-february-2020-volume-1-main-report.pdf> p 71.

⁷ <https://www.food.gov.uk/business-guidance/packaging-and-labelling>

⁸ <https://www.gov.uk/government/publications/communicating-the-uk-chief-medical-officers-alcohol-guidelines>

⁹ <https://www.portmangroup.org.uk/wp-content/uploads/2019/09/Labelling-Toolkit.zip>

¹⁰ <https://www.portmangroup.org.uk/the-portman-group-encourages-industry-to-include-14-unit-cmo-guidance-on-labels/>

2019 labelling survey results

Methodology

We looked at 424 containers (including some duplicate products) between 23 October and 30 October 2019. We covered 18 locations, including 10 supermarkets and one newsagent across London, the South East, Wales, the North East and Scotland. We collected data on every type of product, with beers and red wine being most represented. We included products from the top ten best-selling brands in the UK as well as including products from all Portman Group members.

CMO guidelines

The up-to-date CMO guidelines of 14 units per week were absent from 71% (299) of containers and present on 29% (125). Just one label (Brothers Toffee Apple English Cider) had the full suggested information, explaining that the 14 weekly units should be spread across several drinking occasions.

Of the 299 containers that did not have the current guidelines:

- 199 had no information on drinking guidelines on the label (46.9% of all 424 labels)
- 100 had misleading, out of date guidelines (23.6% of all 424 labels)

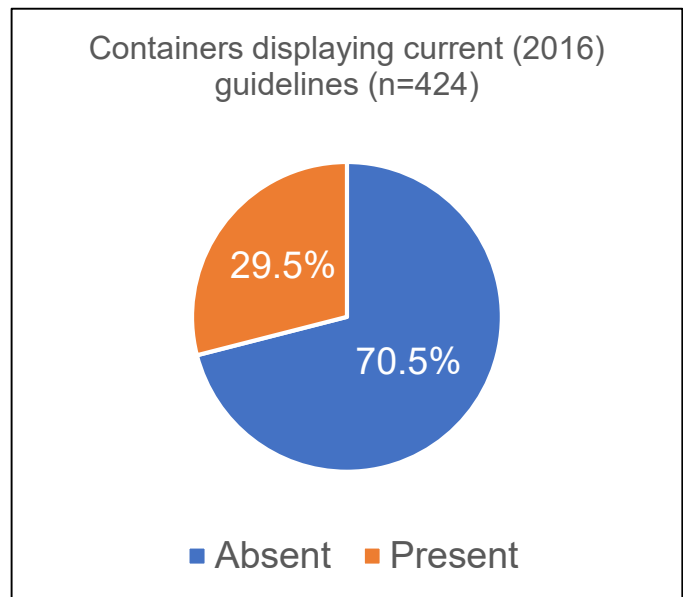


Figure 1: Containers displaying current (2016) guidelines

Of the 199 labels that did not include any drinking guidelines, 158 (37.3% of all 424 labels) instead contained a link to the Drinkaware website. This would require a potential buyer to get online and navigate the website to find the information about drinking guidelines. Drinkaware is an alcohol industry-funded charity which provides information and advice about drinking. It has been widely criticised by public health experts as not presenting information in a clear way, or only providing partial information.¹¹ Signposting to the Drinkaware website on alcohol labels is not a sufficient replacement for providing the current guidelines, not least because research shows that consumers are very unlikely to visit websites for more information.¹²

Of the 125 products which contained the up-to-date guidelines, the text size of 87% (109) could be measured. The text on all but one of them was too small according to Government accessibility guidelines¹³ (text height of 3mm or under). The size of the text ranged from 1mm to 3.5mm and the average height of the text was 1.7mm.

Figure 2 on the next page shows that wines, ciders and ready-to-drink (RTD) products performed the best in terms of having the current 2016 guidelines on labels. Liqueurs, beers and spirits performed the worst. However, no product category achieved more than 40% compliance.

¹¹ For example: Lim, A. W., Van Schalkwyk, M. C., Maani Hessari, N., & Petticrew, M. P. (2019). Pregnancy, Fertility, Breastfeeding, and Alcohol Consumption: An Analysis of Framing and Completeness of Information Disseminated by Alcohol Industry-Funded Organizations. *Journal of studies on alcohol and drugs*, 80(5), 524-533 <https://www.ncbi.nlm.nih.gov/pubmed/31603753>; Petticrew, M., Maani Hessari, N., Knai, C., & Weiderpass, E. (2018). How alcohol industry organisations mislead the public about alcohol and cancer. *Drug and alcohol review*, 37(3), 293-303 <https://www.ncbi.nlm.nih.gov/pubmed/28881410>

¹² RSPH 'Labelling the Point' (2018) <https://www.rsph.org.uk/uploads/assets/uploaded/4ae31b49-c4d7-4355-ad94a660aba36108.pdf>

¹³ <https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats>

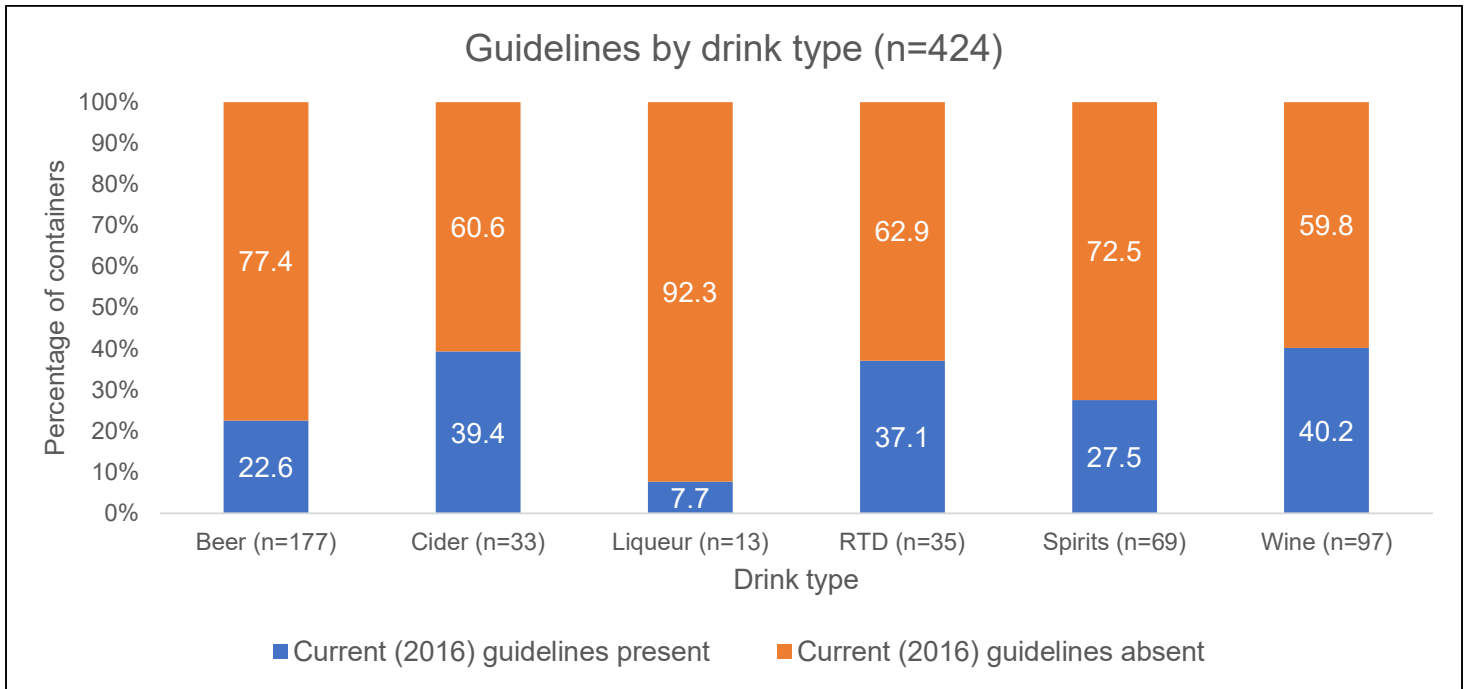


Figure 2: Containers displaying current (2016) guidelines by drink type

The research also looked at how different manufacturer types performed. The data shows that supermarket own-brand labels did best in terms of including the current guidelines.

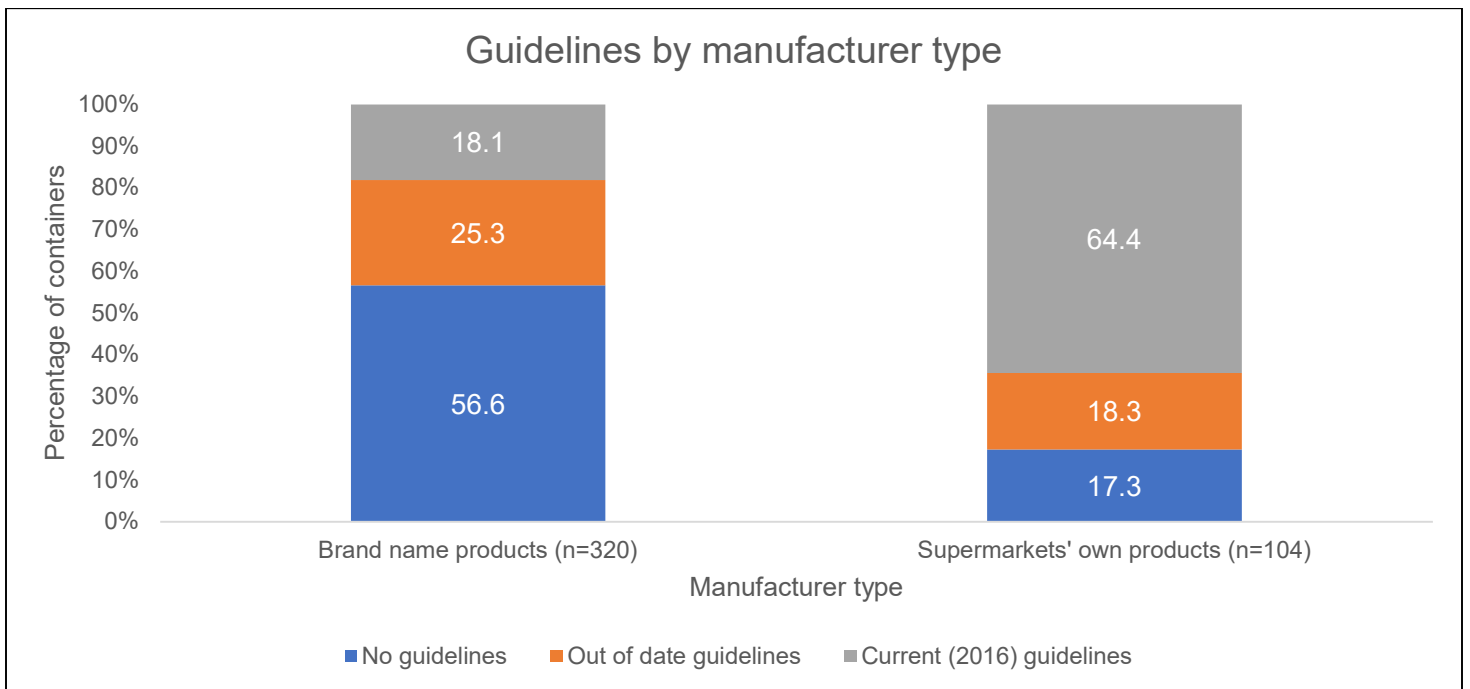


Figure 3: Containers displaying current (2016) guidelines by manufacturer type

Trade body memberships

The figures below show the proportion of sampled containers made by members of each trade body that fail to display the current (2016) guidelines on their labels. It should be noted membership of trade bodies overlaps; there are brands and manufacturers which are members of more than one.

98.5%

did not show up-to-date
guidelines

The Portman Group¹⁴

We sampled 134 containers (57 products from 45 brands) produced by the nine Portman Group members or their subsidiaries (for example Bailey's is a brand and a subsidiary of Diageo, Diageo is a Portman member).

Only 1.5% featured the current (2016) CMO guidelines; 98.5% did not.

89.9%

did not show up-to-date
guidelines

The British Beer and Pub Association (BBPA)¹⁵

We sampled 149 containers (79 products from 68 brands) produced by 20 (34%) of the 58 BBPA members or their subsidiaries.

Only 10.1% featured the current (2016) CMO guidelines; 89.9% did not.

67.7%

did not show up-to-date
guidelines

The Society of Independent Brewers (SIBA)¹⁶

We sampled 31 containers (29 products from 23 brands) produced by 22 of the 139 SIBA members or their subsidiaries.

Only 32.3% featured the current (2016) CMO guidelines; 67.7% did not.

51.4%

did not show up-to-date
guidelines

The Wine and Spirits Trade Association (WSTA)¹⁷

We sampled 175 containers (154 products from 84 brands) manufactured by 27 of the 236 WSTA members or their subsidiaries.

Less than half (48.6%) featured the current (2016) CMO guidelines; 51.4% did not.

¹⁴ At the time of data collection, the Portman Group members were 1) Bacardi Limited; 2) Brown-Forman; 3) Budweiser Brewing group UK&I; 3) Carlsberg; 5) Diageo; 6) Heineken; 7) Jagermeister; 8) Molson Coors and; 9) Pernod Ricard. <https://www.portmangroup.org.uk/about-our-members/> On 25 February 2020, the Portman Group announced three additional members (Aston Manor, SHS Drinks and Asahi): <https://www.portmangroup.org.uk/a-new-era-for-the-portman-group-increased-and-growing-membership/> For the purposes of this report, products from these companies are not included as Portman Group members, as the data were collected and analysed before this announcement was made.

¹⁵ The BBPA has 58 members: <https://beerandpub.com/bbpa-members/> Not all 58 members are manufacturers of alcoholic drinks – some are pub companies or other retailers.

¹⁶ SIBA has 139 brewer members: <https://www.siba.co.uk/directory/brewer-members/> Not all members stock products in the stores we sampled during our fieldwork.

¹⁷ The WSTA has 236 members, not all of which manufacture alcoholic drinks – some are law firms and other trade support organisations: <https://www.wsta.co.uk/wsta-members>

Labelling regulation is still failing consumers

The AHA is calling for all alcohol labels to include the current CMO guidelines in a format that is accessible to consumers.

People have a right to know what is in the drinks they buy and consume, but currently the law does not protect and promote this right. Both in shops when deciding what to buy and at home when choosing if and how much to drink, people cannot easily find the health information and advice they want. If we are to ensure that people have access to the information they need to make informed decisions about alcohol, it must be clearly displayed on all labels.

As it stands, there is no independent body monitoring alcohol labels and no meaningful consequences for manufacturers who fail to give consumers the information they need. Even the members of trade bodies are performing poorly in this area. It is notable that the proportion of products sampled from members of the Portman Group that included the current guidelines was so low, given they are the industry's self-styled "social responsibility body" and "leader in best practice".

This new research shows that even several years after the Government's Chief Medical Officers updated their guidance, only 29% of labels contain the correct guidance, and those are mostly in print that is too small to read easily. The current system of voluntary labelling and industry self-regulation is not working.

The Government now has a choice: to make more aspects of alcohol labelling mandatory, or to bring proper public accountability to the labelling of alcoholic drinks through the regulatory system.

Labelling regulation in Scotland

In their Alcohol Framework, the Scottish Government has highlighted their expectation that all alcohol producers will update their packaging to include the revised CMO guidelines. Noting the inadequate progress made towards all product labels displaying the right information, they have committed to press alcohol producers to place health information on labels and are prepared to consider pursuing a mandatory approach in Scotland if industry progress is inadequate. This is a key opportunity to ensure that people are given the information they need to make informed choices at the point of purchase, as is the case with food and other drinks. The UK Government should also follow suit.