



JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

Forty-fifth Session

Ottawa, Ontario, Canada

13 - 17 May 2019

DISCUSSION PAPER ON THE LABELLING OF ALCOHOLIC BEVERAGES

(Prepared the Russian Federation, the European Union, Ghana, India and Senegal)

INTRODUCTION

1. The 44th session of the Codex Committee on Food Labelling (CCFL44), under Agenda item 9, introduced by Canada, agreed to develop several discussion papers. The Russian Federation with assistance of the European Union, Ghana, India and Senegal, was tasked with drafting a paper on alcoholic beverages labelling.¹
2. Introducing the Agenda item, Canada presented CX/FL 17/44/9 "Discussion Paper On Future Work and Direction for CCFL" and commented that for most the consumption of alcohol does not cause significant harm, but for many populations and individuals alcohol does pose harmful health effects. Given one of the primary objectives of the Codex standards is the protection of health it is important that consideration of such concerns be incorporated into the Codex labelling framework. An example for consideration is the provision of information on labels around alcohol strength and content and the energy content in the product.
3. It was argued that there was a certain lack of harmonisation of labelling requirements for alcoholic beverages. For example, while indication of the alcohol content has been accepted as a common practice, mandatory energy labelling of alcoholic beverages is still rare internationally. With a number of global and regional organizations looking at strategies to combat obesity, energy labelling on alcohol is something that a number of countries may accept as a global standard.
4. While there was broad support for work on alcoholic beverages labelling, some concerns were raised on the proposed work on alcoholic beverages labelling, namely that some of the points raised in the WHO discussion paper were outside the mandate of CCFL, (e.g. health warnings on labels). These issues should be dealt with by national governments and should not be the subject of any future work. There was already considerable work on alcoholic beverages labelling being undertaken in other international fora such as the Organisation internationale de la vigne et du vin (OIV) and the Fédération internationale des vins et spiritueux (FIVS), and Codex work was therefore not necessary at this time; and a comprehensive review of national legislation and work in international fora was needed.
5. Some countries from the African region highlighted the need for work on alcoholic beverages labelling due to increased availability and consumption of alcoholic beverages in their countries. The existing labelling regimes in such countries did not provide sufficient information, such as alcohol content; and that in some instances alcohol was being offered in quantities as little as 100 ml without any labelling.
6. The Committee noted that any work to be undertaken should be within the purview of CCFL and that information on the existing state of play would be needed to further develop any new work.
7. In April 2018 CL 2018/24-FL was circulated to help inform the development of the discussion papers. Annex 4 of the circular letter was dedicated to the alcohol labelling with twelve questions formulated to collect opinions of Codex member countries (CMC), the Codex Member Organization (CMO) and observers (CO) on this topic. It was requested to provide responses to the questions about current practices, issues, and any potential role for CCFL on this topic.
8. Twenty-one (21) responses were received: 19 Codex member countries, the Codex Member Organization and three observer organisations provided answers to the questionnaire.²

¹ REP18/FL, para. 58(d)

² Argentina, Australia, Brazil, Canada, Chile, Colombia, Costa Rica, Egypt, the European Union, India, Indonesia, Jamaica, Japan, New Zealand, Peru, Poland, Russian Federation, Switzerland, Thailand, USA and FIVS, OIV and ICGMA.

In this document, Co-Chairs have summarised all responses received in answering the twelve questions and formulated recommendations to be discussed at the next CCFL session.

RESPONSES TO THE QUESTIONNAIRE ON LABELLING OF ALCOHOLIC BEVERAGES

Question 1 *Within your country/region, what is the current practice for Alcoholic Beverages Labelling including inclusion of a list of ingredients and/or information on the alcohol content, and/or information on the nutritional content? Is the labelling or practice used or proposed (e.g. under development); mandatory/regulatory or voluntary?*

9. Mandatory labelling of alcohol beverages has been enforced in all CMCs and the CMO which provided responses to the questionnaire either through regional/national alcohol regulations/standards or in a broader food law. One CO highlighted their work on a commercial database of international regulations and trade agreements which are applicable to the alcohol beverage industry.
10. Most CMCs and the CMO considered the following components of labelling of alcohol beverages mandatory, in addition to the general requirements for food labelling:
 - a. Alcoholic strength (contents)
 - b. Geographical origin (where applicable)
11. As regards the indication of the list of ingredients and the nutritional information on alcoholic beverages, several CMCs indicated that these indications are mandatory while the majority of respondents indicated that these elements are not mandatory and can be provided on a voluntary basis.

Question 2: Are you aware of existing international guidelines or other relevant work undertaken in other international fora on this topic? If so, please provide relevant reference(s) or website links to access this?

12. The following international publications were cited in the responses to the questionnaire:
 - Technical note: Background on alcohol marketing regulation and monitoring for the protection of public health. Washington, D.C. : PAHO, 2017. <http://iris.paho.org/xmlui/handle/123456789/33972>
 - Global status report on alcohol and health. Geneva. World Health Organisation – 2014 ed. http://apps.who.int/iris/bitstream/handle/10665/112736/9789240692763_eng.pdf;jsessionid=49E71048C95C3EB8271CE6E1E57A420A?sequence=1
 - European action plan to reduce the harmful use of alcohol 2012–2020 <http://www.euro.who.int/en/health-topics/disease-prevention/alcohol-use/publications/2012/european-action-plan-to-reduce-the-harmful-use-of-alcohol-20122021>
 - Alcohol labelling - A discussion document on policy options (World Health Organization, 2017) <http://www.euro.who.int/en/health-topics/disease-prevention/alcohol-use/publications/2017/alcohol-labelling-a-discussion-document-on-policy-options-2017>
 - The World Wine Trade Group (WWTG) labelling agreement - <https://www.trade.gov/td/ocg/WWTGLabel.pdf>
 - APEC's Wine Regulatory Forum (WRF) compendia - APEC WRF Labelling (provides regulatory information (mandatory and voluntary) for wine from each APEC economy)
 - International Standard for the Labelling of Spirituous Beverages of Vitivincultural Origin by the International Organisation of Vine and Wine (OVI) http://www.oiv.int/public/medias/2621/norme-etiquetage-oiv-boispi-fr-en-es-it-de_2013.pdf
 - International standard for the labelling of wine by by the International Organisation of Vine and Wine (OIV) - <http://www.oiv.int/public/medias/4776/oiv-wine-labelling-standard-en-2015.pdf>
 - FIVS Guidelines: www.fivs.org.

Question 3: *What are the issues that you think need to be addressed by CCFL for this topic? Please give a reason(s) for your answer of why it is important (e.g. there is a gap on Alcoholic Beverages Labelling in Codex text(s), clarity is needed on Alcoholic Beverages Labelling for consumer information/choice, etc.).*

13. While the majority of the respondents considered that some issues related to the labelling of alcoholic beverages should be addressed by CCFL, others have not identified any issue to be addressed by CCFL.

14. The following numerous issues have been identified by respondents considering that CCFL should start work on the labelling of alcoholic beverages :
 - Alcohol content. This issue was the most cited.
 - Applicability to the labelling of alcoholic beverages of the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985);
 - List of ingredients and nutrition declaration;
 - Lack of specific standards/provisions for the labelling of alcoholic beverages which could include definitions of alcoholic beverages and standard drink, which information has to be placed on the label of alcoholic beverages and off label, and which voluntary information could be permitted on alcoholic beverages;
 - Health warnings and warning on age limit to consume alcoholic beverages;
 - Advertising and claims on alcoholic beverages.
15. The respondents considering that no issue related to the labelling of alcoholic beverages should be addressed as this stage by CCFL have provided the following reasons:
 - the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) are applicable to the labelling of all prepacked food, including alcoholic beverages and are sufficient and clear;
 - no work should be undertaken by the Committee at all at this time arguing that as the development of policy options to influence consumer behavior, such as combatting the misuse of alcohol, is properly within the purview of national governments;.
 - a survey of the international work currently ongoing on the labelling of alcoholic beverages to better inform CCFL work might be of value.
16. Several CMCs have expressed their view that labels on alcoholic beverages should be covered by Codex Alimentarius documents with special attention paid to product claims in order to prevent misleading consumers.
17. Another CMC remarked that mandatory labelling of alcoholic beverages should also address global health issues such as hepatitis, cirrhosis, gastritis, sexual impotence, infertility, infarction, thrombosis, cancer and dementia.
18. There were proposals expressed that the labelling should include mandatory warnings on restriction of sale and consumption of alcoholic beverages for persons under 18 years of age, and a compulsory insertion of the "Avoid Excessive Alcohol Consumption" warning on all beverages with an alcohol content of at least half a degree Gay Lussac.
19. Several CMCs proposed to discuss applicability of relevant Codex documents to the alcohol labelling and how they should be used. In particular, it was emphasised that the lack of specific, precise and clear guidance on the labelling of alcoholic beverages needs to be addressed by CCFL. It was argued that *General Standard for Labelling of Pre-Packaged Foods* (CXS 1-1985) should provide specific labelling provisions for alcoholic beverages and wines.
20. There was also a proposal that the list of ingredients and the nutrition declaration as well as general principles of the alcohol labelling should be discussed as part of this work.
21. It was also proposed to add to CXS 1-1985 the following requirements for alcohol beverages:
 - a. Definition of alcoholic beverage (% of alcohol which triggers classification of alcohol beverage)
 - b. Standard drink definitions
 - c. Information to be placed on a label and what could be provided by other means
 - d. Voluntary information which could be permitted on the label/in accompanying documents.
22. Besides, it was mentioned that *General Standard For Contaminants And Toxins in Food and Feed* (CXS 193-1995) contains provisions for lead contents in wines while other heavy metals should also be controlled in wines and in alcoholic beverages in general.

Question 4: Are alcoholic beverages defined and classified under national/regional regulation and/or standards?

23. All responses received from CMCs, the CMO and COs have confirmed that alcoholic beverages were defined and classified in regulations and/or standardised at the national or regional level.
24. In several countries, labelling of standardised alcohol beverages do not require full ingredient listing while non-standardised beverages always require the ingredient list in the product label.
25. According to information provided by one observer organisation, they collected data on 56 countries which have regulatory definitions and classifications for at least 185 different categories of alcohol beverages.

Question 5 *Are there mandatory components in labelling of alcohol beverages?*

26. Mandatory labelling requirements varied considerably from country to country and often depended on a beverage type. For example, expiry date was not always mandatory and was required for beverages with certain alcohol contents. In other countries, mandatory labelling was applicable to wine only.
27. At the same time, labelling components listed in section dedicated to Question 1 above were defined in most jurisdictions. It should be noted that in countries where alcoholic beverages were subject to state registration, the registration number should also be included in the product label.
28. According to the responses received, mandatory labelling components typically include
 - a. Alcoholic content;
 - b. Country of origin;
 - c. Nutrition information;
 - d. Place of packaging or bottling;
 - e. Protected designation of origin and protected geographical indications
 - f. Sugar content for wines;
 - g. Beverage classification;
 - h. Warnings or advisory statements, i.e.:
 - [Excessive] consumption of alcohol and associated health risks
 - Drinking and driving
 - Drinking alcohol during pregnancy
 - Warning for illegal sales to persons under certain age
 - Specific mark on liquor with alcoholic strength less than 10% for preventing misinterpretation as a soft drink
29. In several countries, beverage labels may be reviewed by authorities to confirm compliance with regulatory requirements before beverages are placed on the market.
30. One observer organisation reported information from their database of 60 countries stating that all of them have enforced mandatory alcohol labelling.

Question 6: *Are there voluntary components in labelling of alcohol beverages?*

31. Most respondents allow additional voluntary components in labels of alcohol beverages. At the same time, several CMCs indicated that in their jurisdictions all labelling components were mandatory.
32. One CMC reported that the nutrition declaration was voluntary for alcohol beverages and could be used to highlight contents of nutrients. However, if a nutrient content claim is made, the nutrient declaration becomes mandatory (see the next section).
33. According to the responses, voluntary labelling information is commonly used for wines e.g. declaring generic name of the grape and its variety, or raw material used, geographic origin, and vintage year. Besides, method of production could also be specified as well as awards and medals given to the product.
34. There is also a recommendation, as reported by one CMC, by a national advisory body, to indicate in labelling a number of drinks (defined as 17.5 ml of ethanol) in the beverage container.
35. The voluntary components in labelling of alcoholic beverages most frequently mentioned by the respondents were the following:

- a. List of ingredients;
- b. Nutrition information;
- c. Claims;
- d. Organic origin;
- e. Geographical origin;
- f. Grape variety, vintage and sugar content for wine;
- g. Production method;
- h. Warnings and advisory statements.

Question 7: *Are there mandatory/voluntary graphic symbols used in the product labelling?*

36. The majority of respondents indicated that graphic symbols are widely used in labels of alcohol beverages. In most cases, the symbols are used to reinforce health warnings, e.g. risks for pregnant women, or drunk driving. Several CMCs and the CMO reported the mandatory use of symbols that warn on the presence of allergens. The use of organic or origin symbols are allowed in some countries.
37. No CMC/CMO reported restrictions on the voluntary use of graphic symbols. At the same time, one CO commented that, according to their database which covers information on 60 countries, 42 countries have voluntary regulations and 32 countries have mandatory regulations for graphic symbols used for various labelling topics. They added that legislation of some countries/regions exempt or prohibit the use of graphic symbols for certain alcohol beverage labelling topics.

Question 8: *Are claims allowed in the product label?*

38. In their responses, most CMCs and the CMO stated that they accepted nutrient claims for alcohol beverages, e.g. 'low in carbohydrates'. Several CMCs also allowed ingredient claims, e.g. no preservatives used or GMO-free.
39. Some respondents reported that in their jurisdiction, quality claims on alcoholic beverages, e.g. organic or vegan, are allowed if they are truthful and not misleading.
40. Several CMCs and the CMO reported that the quality claims were allowed for wines if they were truthful and not misleading. Organic claims were also allowed provided they were supported by evidence. In the countries where organic products are subject to a voluntary/mandatory certification, organic statement should be accompanied by a certificate number and a name of the certified authority.
41. Health claims are typically not allowed for alcohol beverages with alcohol contents above 1.2 to 1.5 per cent.
42. Other claims allowed include statements on beverage flavours, maturity age, light or low alcohol contents.

Question 9 *Do you consider that the existing Codex General Standard for the labelling of prepackaged foods and the Codex Guidelines on nutrition labelling are sufficient in terms of provision of the list of ingredients and the nutrition labelling on alcoholic beverages?*

43. 11 CMCs were of the opinion that the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) did not provide clear guidance on labelling of alcoholic beverages:
 - a. Six CMCs noted that there was a lack of clarity in terms of applicability of the existing Codex documents to alcoholic beverages;
 - b. Two CMCs considered that there was a gap in requirements in these Codex documents for the labelling of alcoholic beverages;
 - c. Three CMCs noted that specific standards should be drafted for the labelling of alcoholic beverages and in particular for the list of ingredients and nutritional information.
44. At the same time, seven CMCs and the CMO expressed their general satisfaction with the current Codex provisions considering that they are clear in terms of their applicability to the labelling of alcoholic beverages and sufficient in terms on how the information has to be provided. One of them could however support the work by CCFL on alcohol content if decided. One CMC is also of the view that national authorities are in the best position to determine what type of labelling is most effective for their consumers.
45. One CMC commented that current provisions were satisfactory, however the requirement to include the ingredient list and the nutrition declaration should be clearly specified for alcoholic beverages.

46. Others proposed that a separate labelling standard should be created to define requirements for alcohol labelling. One CMC commented that alcohol beverages are not considered as food, and, thus, Codex texts were not applicable.

Question 10: *Do you consider that CCFL should pursue work on the labelling of ingredients for alcohol beverages?*

47. Ten CMCs have found it necessary to pursue the work on ingredient list in labelling of alcohol beverages. It was argued that CCFL should equally cover labelling requirements for all foods including alcohol. In particular, the respondents argued that greater clarity of application of the *General Standard for the Labelling of Pre-packaged Foods* to alcoholic beverages should be provided by CCFL.
48. Respondents in support of CCFL work on the labelling of ingredients suggested that special attention should be given to ingredients which are known to cause hypersensitivity. For example, it was proposed to list all cereals used in beverage production, i.e. barley, rice, corn etc.
49. One CMC commented that CCFL work on ingredient labelling should be harmonised with requirements of other intergovernmental organisations, i.e. Organisation Internationale de la Vigne et du Vin (OIV).
50. At the same time, 5 CMCs, the CMO and two observer organisations did not consider that the work on the labelling of ingredients of alcoholic beverages should be pursued by CCFL considering that the rules of the *General Standard for the Labelling of Pre-packaged Foods* are clear and sufficient.
51. Furthermore, a number of CM and 2 observers did not consider alcohol labelling under the scope of CCFL work. They argued that alcohol labelling should remain under control of national or regional authorities or that CCFL work in this field was premature.

Question 11: *Do you consider that CCFL should pursue work on labelling of alcohol content on alcohol beverages?*

52. Labelling of alcohol contents for alcohol beverages is currently not covered in the Codex Guidelines, and most respondents expressed their view that CCFL should consider this issue in order to provide consumers with information to make informed choices and for harmonisation of alcoholic content labelling practices at international level.
53. Several CMCs were of the view that alcohol content was mandatory in product labelling in most jurisdictions, and CCFL might consider using its resources on other important issues.

Question 12: *Do you consider that CCFL should pursue work on the labelling of nutritional information on alcohol beverages?*

54. In their responses, a considerable number of CMs and the CMO considered that the work on the labelling of nutritional information on alcoholic beverages should not be pursued for different reasons such as:
- the already existing Codex guidance on this topic applicable to the labelling of alcoholic beverages, the non-priority character of this topic;
 - the incompatibility of nutrition information with alcoholic beverages; or
 - the wide variety of alcohol beverages and their composition.
55. It was also noted that the topic is an important policy discussion that only emerges in some countries.
56. Other CMCs were of the opinion that alcohol beverages were foods and nutrition information was mandatory part of their labelling. Therefore, CCFL needs to ensure that the Labelling Guidelines clearly indicate that they are applicable to labelling of alcohol beverages. This way a harmonized approach will be offered to Codex members helping avoid technical barriers.
57. One CMC commented that before deciding on any future work on the labelling of nutritional information on alcohol beverages, a discussion should take place in CCFL on whether alcoholic beverages have specificities which justify a particular approach for the labelling of nutritional information.

CONCLUSIONS

RECOMMENDATIONS

Based on review and analysis of responses to the Circular Letter and answers provided by the CMCs, the CMO and COs to the twelve questions, co-Chairs would request CCFL to consider the recommendations provided hereunder. These recommendations reflect the proposals made by respondents. The numbering of the recommendations is neither indicative of the preference of the co-chairs nor of the level of support by respondents.

Recommendation 1

To initiate new work on a new Codex standard on labelling of alcoholic beverages.

This Recommendation is based on the view that labelling of alcohol labelling is too specific to be covered by the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985).

Recommendation 2

To initiate new work to provide clarity in the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) on their applicability to alcoholic beverages and to consider revisions of these two codex texts in terms of labelling of alcohol content and nutritional information, including energy value of alcoholic beverages.

This Recommendation is based on the view that the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) apply to all prepackaged foods, including alcoholic beverages but are not sufficiently clear on whether they precisely apply to alcoholic beverages, do not address the labelling of alcohol content which is an important information for consumers to make informed choices and are not taking into account possible specificities of alcoholic beverages.

Recommendation 3

To initiate new work to provide clarity in the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) on their applicability to alcoholic beverages and to consider revisions of these two codex texts in terms of labelling of alcohol content of alcoholic beverages.

This Recommendation is based on the view that the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) apply to all prepackaged foods, including alcoholic beverages but are not sufficiently clear on whether they precisely apply to alcoholic beverages and do not address the labelling of alcohol content of alcoholic beverages which is an important information for consumers to make informed choices.

Recommendation 4

To initiate new work to provide clarity in the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) on their applicability to alcoholic beverages.

This Recommendation is based on the view that the existing *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition labelling* (CXG 2-1985) apply to all prepackaged foods, including alcoholic beverages but are not sufficiently clear on whether they precisely apply to alcoholic beverages.

Recommendation 5

Not to initiate new work related to the labelling of alcoholic beverages

This recommendation is based on the view that the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) and the *Guidelines on Nutrition Labelling* (CXG 2-1985) apply to all prepackaged foods, including alcoholic beverages, and are sufficient to address the labelling of alcoholic beverages.