

**POSITION PAPER ON:
HEALTH WARNING MESSAGES ON ALCOHOLIC BEVERAGES**



March 2011

The European Alcohol Policy Alliance (EUROCARE)

The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governmental and public health organisations with around 50 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. Alcohol causes measurable inequalities both between and within Member States. Alcohol causes an estimated 90 extra deaths per 100.000 men and 60 extra deaths per 100.000 women in the EU 12 as compared to the EU 15.

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 an integrated 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.

Health warning messages on alcoholic beverages are:

- a cost effective measure**
- easy to implement on the EU level**
- leaving the consumers the freedom to choose while informing about the risks**

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

PRODUCT SAFETY

Promoting consumers rights, prosperity and wellbeing are core values of the European Union (EU) and this is reflected in its laws. Consequently, the Directive on General Product Safety obliges producers 'to provide consumers with relevant information to enable them to assess the risks inherent in a product (...) where such risks are not immediately obvious without adequate warnings'²

Alcohol is a recognised cause in some 60 diseases and conditions; however public awareness about the risks associated with alcohol consumption remains relatively low. For instance despite the research dating back to 1987 that conclusively points out to the carcinogenicity of all alcoholic beverages³ the connection between alcohol and cancer is not well known by the consumers. The 2010 Eurobarometer report found that 1 in 10 European citizens do not know that there is a connection and what is especially alarming, 1 in 5 do not believe that drinking alcohol increases the risk of getting cancer⁴.

There is a clear public health interest and obligation to inform consumers, of the dangers and health risks associated to the consumption of alcohol. Labelling is an important tool in order to raise awareness of the risks associated with alcohol consumption. Labels are an integral part of the communication and are a mean of constantly delivering a clear message to consumer. Therefore, introduction of health warning messages on the alcohol labels throughout the EU would prove a cost effective measure, to significantly raise public awareness about the risks associated with alcohol consumption. These messages could be a symbolic statement concerning the nature of the product, a low cost reminder that alcohol is not an ordinary commodity.

So far, only France is informing its consumers in a form of health warning labels and this is only limited to information about the dangers of drinking alcohol during pregnancy.

PRODUCT INFORMATION

Labelling is an important information tool which can be considered as part of a communication between producers, public authorities and consumers.

Warning labels can increase knowledge and encourage change in perception of risks associated with alcohol consumption. Studies show that warning labels are noticed by most

² DIRECTIVE 2001/95/EC; <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2002:011:0004:0004:EN:PDF>

³ International Agency for Research on Cancer (1987) *Monographs on the Evaluation of Carcinogenic Risks to Humans Volume 44: Alcohol Drinking*. <http://monographs.iarc.fr/ENG/Monographs/vol44/volume44.pdf>

⁴ Eurobarometer (2010) *EU citizens' attitudes towards alcohol* http://ec.europa.eu/public_opinion/archives/ebs/ebs_331_en.pdf

drinkers, especially by young and high risk drinkers and prompt target groups to discuss health effects of drinking (especially early after their introduction)⁵. Evidence also suggests that the recall of warning labels was associated with being less likely to report having engaged in drunk driving⁶.

WHY HEALTH WARNINGS?

Labelling is a means 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 or specific risk behaviours such as drinking and driving. At the moment most studies examining the effectiveness of health warning messages are reporting on the US health warning scheme, which has not changed since its introduction in 1989. Consequently, these results are difficult to apply in the present European setting and their assessment proves problematic.

Warning labels can nevertheless be expected to increase knowledge, and perhaps even to change risk perception. Increasing awareness about the risks associated with alcohol consumption can be expected to lead to a positive change in engagement with risky behaviour (alcohol misuse).

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

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.

HIGH PUBLIC SUPPORT

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.

⁵ Babor, T., Caetano, R., Casswell, S., Edwards, G., Giesbrecht N., Hill L., Holder H., Homel R., Osterberg E., Rehm J., Room R. and Rossow I. (2003) *Alcohol: No ordinary commodity – research and public policy*. Oxford: Oxford University Press
Greenfield T. (1997) Warning Labels: Evidence on harm reduction from long-term American surveys. In: Plant M., Single E. and Stockwell T. (Eds.) *Alcohol: Minimizing the harm*. London: Free Association Books.

⁶ Greenfield T. (1997) Warning Labels: Evidence on harm reduction from long-term American surveys. In: Plant M., Single E. and Stockwell T. (Eds.) *Alcohol: Minimizing the harm*. London: Free Association Books

RECOMMENDATIONS

Eurocare believes labelling should be part of an integrated 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.

Health warnings on alcoholic beverages should:

- Have a standard format and design, irrespective of the brand of the alcohol beverages, so that they do not become a part of the specific beverage design, this will ensure better visibility of such warnings
- Be placed in a standard location on the container
- Be parallel to the base of the container, be in a box
- Appear on a contrasting background (black on white)
- Size should be determined by a minimum percentage of the size of the container
- Be rotating and with sufficient vividness and strength to attract consumers'
- Be determined by the European Institution/ Agency or Ministers of Health (public body not private agency)
- Be non promotional- there should be a clear distinction between product information and the marketing of the product
- Use images that are informational in style and taken from other ongoing education campaigns, this would enhance their effectiveness
- Be understandable (should be in the official language of the country in which the product is sold)
- Be separate from other information of the label

Health warnings should deliver clear messages about the harm to the individual and others of consuming alcoholic drinks. These should cover health (liver cirrhosis, cancers etc), mental health issues, injuries, violence and the risk of dependence. In addition, specific messages should warn of the dangers of consuming alcohol during pregnancy, when driving, operating machinery or taking certain medication.

Eurocare believes all alcoholic beverages should also be required to state on their labels: their ingredients, any substances with allergenic effect, relevant nutrition information (e.g. energy value), and alcoholic strength, as well as include a health/ safety warning. Such information would in our opinion enable consumers to make informed choices about their alcohol consumption