

## POSTION PAPER ON THE EU WINE PACKAGE



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## ABOUT EUROCARE

For over thirty years, the European Alcohol Policy Alliance (Eurocare) has led efforts to reduce alcohol-related harm by promoting evidence-based policies that put people's health first. Uniting more than 50 NGOs across 23 countries, Eurocare works to empower civil society, amplify the voices of those affected by alcohol harm, and ensure that public health is not sidelined in EU decision-making. We collaborate closely with international institutions such as the World Health Organisation and are the only alcohol-focused NGO with official observer status at the Codex Alimentarius Commission - a UN body setting global standards on food and alcohol labelling. Through research, engagement, and advocacy, Eurocare supports the development of strong public health policies at both EU and global levels, always acting independently of industry influence.

## RECOMMENDATIONS

### 1. Protect Consumers' Rights

- Mandate the use of "reduced alcohol" instead of misleading terms such as "alcohol-light" or "low-alcohol".
- Ensure ingredient and nutritional information remains mandatory and visible on-label for all alcohol under 1,2% ABV.
- Reject QR codes as a replacement for on-label information, given their inaccessibility and potential to exacerbate health inequalities.

### 2. Engage in a Democratic and Accountable Process

- Halt the adoption of new wine labelling rules until a full, transparent public consultation and impact assessment is conducted.
- Apply the EU's Better Regulation principles consistently across all sectors, including alcohol policy.
- Ensure that civil society and public health voices are systematically included in all EU wine policy processes.
- Involve the Health Commissioner, public health experts, and WHO representatives in shaping future wine legislation.

### 3. Invest in Essential Food Crops and Sustainable Agriculture

- Shift EU support from crisis management tools to long-term structural transition in the wine sector.
- Prioritise funding for crop conversion, sustainable land use, and diversification in oversupplied wine-producing regions.
- End inefficient cycles of public spending that sustain overproduction and distort market signals.

### 4. Protect and Promote Public Health

- Phase out EU subsidies that support alcohol promotion, both within and outside the EU in line with the Sustainable Development Goals.
- Align EU wine policy with the goals of the Europe's Beating Cancer Plan and the WHO European Framework of Action on Alcohol 2022-2025 which was unanimously adopted by all Member States at the WHO Regional Committee for Europe in September 2022.

## OUR POSITION ON THE EU WINE PACKAGE

The European Commission's proposal to revise the EU wine market rules via the EU Wine Package aims to respond to structural challenges for this sector, including declining consumption, oversupply, and climate change. What sets this proposal apart from many previous EU alcohol-related initiatives is that it touches on **the supply side of alcohol policy**, a dimension too often neglected in favour of **demand-side** measures such as taxation and marketing restrictions. . From this perspective, we welcome the inclusion of certain supply-side measures in the Wine Package, particularly the proposal to allow Member States to restrict new vineyard plantings in areas suffering from structural oversupply. This flexibility could help reduce the overall availability in alignment with declining consumer demand, contributing to overall reduction in alcohol-related harm.

However, a paradigm shift is needed in developing a regulatory strategy to address alcohol-related harm, one that asserts the importance of demand reduction strategies alongside supply-side measures to ensure sustainable progress. This is already the case in tobacco control, with this principle being clearly enshrined in the WHO Framework Convention on Tobacco Control (FCTC), which includes a comprehensive set of measures tackling both tobacco demand (e.g. taxes, advertising bans, labelling) and supply (e.g. crop substitution, illicit trade control, and sales restrictions).

Unfortunately, the proposal also perpetuates problematic demand-side practices, particularly through the introduction of vague and misleading terminology (such as alcohol-light and low alcohol), QR codes bypassing existing EU regulation for alcoholic beverages below 1.2% ABV, and continued public subsidies for wine promotion. This position paper presents our key objections to the current proposal and provides concrete recommendations to ensure that future EU wine policy is transparent, equitable, and aligned with the EU's broader public health and sustainability goals.

### Alcohol Related Harm in the EU

Alcohol consumption contributes to premature mortality and disability, causing almost 1 million deaths annually in the WHO European Region. Alcohol is classified as a group 1 carcinogen by the International Agency for Research on Cancer (IARC)<sup>1</sup> as there is a proven, causal link between alcohol and several types of cancer including breast cancer. Alcohol consumption is also a causal factor for more than 200 health conditions (diseases and injuries), including many chronic diseases like cardiovascular diseases and liver cirrhosis.<sup>2</sup> Despite all of the scientific evidence regarding the negative health consequences of drinking alcohol, research demonstrates poor public knowledge of the association between alcohol and a range of alcohol-related health conditions, including cancer.<sup>3 4 5</sup> OECD modelling estimates that between 2020 and 2050, alcohol consumption exceeding one drink per day for women and 1.5 drinks per day for men will lead to over 125 000 premature deaths annually in the EU.<sup>6</sup> The damaging impact of alcohol starts early in the life course. Prenatal alcohol exposure can lead to fetal alcohol spectrum disorders (FASD), an umbrella term for a range of birth defects which include physical, mental, behavioural and/or learning disabilities with possible lifelong implication and which, unlike many other disabilities, are 100% preventable. In addition, alcohol is responsible for 1 in every 4th death in the age group of 20–24-year-olds.<sup>7</sup> The economic burden of alcohol consumption is also large, with estimates for EU countries for which data are available ranging between 0.4% and 1.5% of GDP.<sup>8</sup>

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<sup>1</sup> [https://monographs.iarc.who.int/wp-content/uploads/2019/07/Classifications\\_by\\_cancer\\_site.pdf](https://monographs.iarc.who.int/wp-content/uploads/2019/07/Classifications_by_cancer_site.pdf)

<sup>2</sup> *Global status report on alcohol and health and treatment of substance use disorders*, World Health Organization 2024, <https://iris.who.int/handle/10665/377960>

<sup>3</sup> Correia D, Tran A, Kokole D, Neufeld M, Olsen A, Likki T et al. *Designing and implementing an experimental survey on knowledge and perceptions about alcohol warning labels*. *Int J Methods Psychiatr Res*. 2024;33(2):e2016 (<https://doi.org/10.1002/mpr.2016>).

<sup>4</sup> Neufeld M, Kokole D, Correia D, Ferreira-Borges C, Olsen A, Tran A et al. *How much do Europeans know about the link between alcohol use and cancer? Results from an online survey in 14 countries*. *BMC Res Notes*. 2024;17(1):56 (<https://doi.org/10.1186/s13104-024-06707-w>).

<sup>5</sup> Correia D, Kokole D, Rehm J, Tran A, Ferreira-Borges C, Galea G et al. *Effect of alcohol health warning labels on knowledge related to the ill effects of alcohol on cancer risk and their public perceptions in 14 European countries: an online survey experiment*. *Lancet Public Health*. 2024;9(7):e470–e480 ([https://doi.org/10.1016/S2468-2667\(24\)00102-6](https://doi.org/10.1016/S2468-2667(24)00102-6)). Licensed under CC BY-NC-ND 4.0

<sup>6</sup> *Health at a Glance: Europe 2024. State of Health in the EU Cycle*, OECD [https://www.oecd.org/en/publications/health-at-a-glance-europe-2024\\_b3704e14-en.html](https://www.oecd.org/en/publications/health-at-a-glance-europe-2024_b3704e14-en.html)

<sup>7</sup> [https://www.who.int/europe/health-topics/alcohol#tab=tab\\_1](https://www.who.int/europe/health-topics/alcohol#tab=tab_1)

<sup>8</sup> *Preventing Harmful Alcohol Use*, OECD Health Policy Studies, OECD Publishing, Paris, <https://doi.org/10.1787/6e4b4ffb-en>

## 1. The EU Wine Package Risks Weakening Existing Consumers Rights

### **Concern: Misleading terminology may confuse consumers.**

The terminology proposed by EU institutions negotiating the EU Wine Package, such as “alcohol light” and “low-alcohol” is not defined under the FIC Regulation<sup>9</sup> and risks misleading consumers. Under FIC, product naming must not confuse people about the nature, composition, or strength of a product. The term “low-alcohol” is particularly concerning, as in other contexts “low” is strictly linked to a health benefit (such as low fat, sugar, or salt). Applying it to wine containing up to 6% alcohol departs from this established approach given the alcohol’s damaging effect on health even at low levels of consumption<sup>10</sup>. It misinforms consumers by creating a false sense of safety, undermining long-standing consumer health protections.

Moreover, wine-specific terms like “low-alcohol” may be used even when the product contains more alcohol than a standard beer or cider, which are not allowed to carry similar descriptors due to the lack of harmonised definitions across product types. For example, a “low-alcohol” wine at 6% ABV could appear healthier or safer than a regular-strength beer at 5% ABV despite actually containing more alcohol, undermining both consumer understanding and public health messaging.

The proposed alternative is “reduced alcohol”. “Reduced [x]” has existed in EU legislation on food since 2006 and it describes products whose content in a given substance has been reduced, without suggesting that it is low in absolute terms or that the threshold is beneficial for health. The term “reduced alcohol” correctly informs consumers and ensures consistency within EU food labelling legislation.

### **Recommendation:**

- **Mandate the use of “reduced alcohol” instead of misleading terms such as “alcohol-light” or “low-alcohol”.**

### **Concern: QR codes may limit access to basic product information.**

Currently, in Europe, alcohol under 1.2% alcohol by volume (ABV) is required to provide nutritional and ingredient information on product labels, under the FIC Regulation. The new measures proposed in the EU Wine Package concerning no- and low-alcohol wines risk undermining these consumer protections by allowing this information to be provided via QR codes.

However, QR codes are not a viable solution. In a 2022 Commission consultation<sup>11</sup> consumer group organisations emphasized that many consumers lack the equipment to access QR codes, are unlikely to use them, may not pay attention to them, and may not consider them reliable. It goes without saying that scanning QR codes requires a smartphone and a reliable data connection. According to research from the Pew Center<sup>12</sup>, whilst 87% of Dutch residents owned a smartphone in 2019, only 59% of Greeks did so. According to EU Commission data<sup>13</sup>, 46% of Europeans lack basic digital skills. There is also a rural divide in access to the internet and smartphones<sup>14</sup>. For these reasons, online labelling via QR codes has the potential to widen health inequalities even further, only allowing a certain set of the population to have access to basic nutrition and ingredients information.

### **Recommendations:**

- **Ensure ingredient and nutritional information remains mandatory and visible on-label for all alcohol under 1,2% ABV.**
- **Reject QR codes as a replacement for on-label information, given their inaccessibility and potential to exacerbate health inequalities.**

<sup>9</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011R1169-20250401>

<sup>10</sup> <https://www.who.int/europe/news/item/04-01-2023-no-level-of-alcohol-consumption-is-safe-for-our-health>

<sup>11</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12749-Food-labelling-revision-of-rules-on-information-provided-to-consumers/public-consultation\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12749-Food-labelling-revision-of-rules-on-information-provided-to-consumers/public-consultation_en)

<sup>12</sup> <https://www.pewresearch.org/global/2019/02/05/smartphone-ownership-is-growing-rapidly-around-the-world-but-not-always-equally/>

<sup>13</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Towards\\_Digital\\_Decade\\_targets\\_for\\_Europe](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Towards_Digital_Decade_targets_for_Europe)

<sup>14</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Urban-rural\\_Europe\\_-\\_digital\\_society](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Urban-rural_Europe_-_digital_society)

## 2. The EU Wine Package is Undermining Democracy and Accountability

### **Concern: The process is biased, excluding key stakeholders and evidence.**

Eurocare is deeply concerned that the EU institutions are advancing a wine-specific labelling proposal through a process that falls short of democratic standards and the European Commission's own Better Regulation Guidelines. These measures have not been subject to a public consultation, nor have they been accompanied by an impact assessment, despite the significant economic, environmental, and public health implications. This undermines transparency, weakens stakeholders' trust, and bypasses citizens' right to participate in EU decision-making as guaranteed by Articles 10(3) and 11 of the Treaty on European Union (TEU).

While the Commission has repeatedly delayed action on alcohol labelling under the Food Information to Consumers (FIC) Regulation, citing the need for a full impact assessment, it is now fast-tracking wine labelling changes through the Common Agricultural Policy without the same scrutiny. This double standard damages the credibility of the Commission's approach and suggests undue influence by vested interests.

The Commission's failure to open this initiative to inclusive consultation (via channels such as the 'Have Your Say' portal) contravenes the principles of openness, participation, and accountability. Decisions with significant implications for consumer rights, health policy, and the internal market must be guided by evidence, not expediency. The proposed measures appear to have been shaped behind closed doors within the High-Level Group on Wine Policy, where civil society and public health stakeholders were systematically excluded. This exclusion is not just a procedural flaw; it reflects a political choice to sideline health and consumer protection. Eurocare has repeatedly expressed concern to the European Commission over this process, especially given the Commission's unfulfilled commitment under Europe's Beating Cancer Plan to introduce mandatory ingredient and nutritional labelling on all alcoholic beverages.

### **Recommendations:**

- **Halt the adoption of new wine labelling rules until a full, transparent public consultation and impact assessment is conducted.**
- **Apply the EU's Better Regulation principles consistently across all sectors, including alcohol policy.**
- **Ensure that civil society and public health voices are systematically included in all EU wine policy processes.**

### **Concern: This siloed approach is ignoring One Health principles.**

The current process fails to reflect the integrated, cross-sectoral approach needed to tackle public health challenges. A truly inclusive and legitimate wine policy must incorporate environmental, agricultural, market and public health perspectives in line with the EU's 'One Health' principles, particularly in light of the recent claim<sup>15</sup> by a Member of the European Parliament ENVI Committee regarding the presence of pesticides in all European wines. We call for the involvement of the Health Commissioner, public health experts, WHO representatives, and civil society organisations in shaping the future of alcohol policy.

### **Recommendations:**

- **Involve the Health Commissioner, public health experts, and WHO representatives in shaping future wine legislation.**

<sup>15</sup> [https://multimedia.europarl.europa.eu/en/webstreaming/envi-committee-meeting\\_20250513-0930-COMMITTEE-ENVI](https://multimedia.europarl.europa.eu/en/webstreaming/envi-committee-meeting_20250513-0930-COMMITTEE-ENVI)

### 3. The EU Wine Package Risks Diverting Funds from Growing Essential Food Crops and Supporting Sustainable Agriculture

**Concern: The underlying causes of wine overproduction are not addressed.**

Eurocare welcomes the Commission's recognition of structural overproduction in the wine sector and the proposal to allow Member States to limit new planting authorisations in regions with excess supply. However, the underlying drivers of chronic overproduction remain unaddressed. Current EU incentive structures continue to reward volume over actual demand, creating a distorted market and undermining sustainability goals.

Public funds should be redirected toward long-term solutions (such as supporting wine producers to exit the sector or convert to alternative crops), rather than maintaining current level of production that have consequences on public health within the European Region as well as other regions of the world. Incentivising crop diversification and reducing overall production capacity in oversupplied regions is essential to addressing the root of the problem.

Tools like green harvesting, grubbing up, and the distillation of surplus wine into industrial alcohol may offer temporary relief but risk becoming costly and inefficient if repeatedly used. In some cases, the wine sector benefits from public funding at multiple stages: for producing the surplus, for destroying it, and again when the by-products are sold (e.g. as hand sanitiser to public institutions). This cycle results in taxpayer money being used several times to prop up inefficiencies, at a time when such resources are critically needed elsewhere.

In the context of climate change, global food insecurity, and increasing public health costs, continuing to allocate land, water, and fertilisers to overproduced wine is indefensible. These resources would be better used to grow essential food crops and support truly sustainable agriculture.

**Recommendations:**

- **Shift EU support from crisis management tools to long-term structural transition in the wine sector.**
- **Prioritise funding for crop conversion, sustainable land use, and diversification in oversupplied wine-producing regions.**
- **End inefficient cycles of public spending that sustain overproduction and distort market signals.**

## 4. The Promotional Aspects of the EU Wine Package Are in Direct Conflict with Public Health

**Concern: Promoting wine is inconsistent with EU's objectives on health and prevention.**

Eurocare is strongly critical of the continuation and in some cases expansion of EU-funded alcohol promotion under the Wine Package. Promoting wine consumption with public money runs directly counter to the EU's commitments under the Europe's Beating Cancer Plan, the Global Alcohol Action Plan 2022-2030, adopted by the 75th World Health Assembly in 2022, and the UN sustainable development goals, all of which call for reduced alcohol harm through evidence-based policies. It is important to note that the European Commission has committed itself to identify all relevant UN sustainable development goals for each proposal<sup>16</sup> (through impact assessments – Chapter 3 Tool 19 & Tool 32<sup>17</sup>) and examine how the initiative will support their achievement.

It is particularly concerning that such promotion is being maintained despite declining consumer demand and growing (albeit still limited) awareness of the health risks associated with alcohol. Public resources would be far better allocated to support public health measures, especially given that the WHO European Region has the highest proportion of drinkers and alcohol consumption globally; alcohol is a leading cause of more than 200 diseases, including seven types of cancer (though this risk remains insufficiently recognised by the public<sup>18</sup>), cardiovascular diseases, and liver cirrhosis<sup>19</sup>; alcohol causes nearly 1 million deaths each year in the European region; alcohol's impact begins early in life<sup>20</sup>, including through Fetal Alcohol Spectrum Disorders (FASD), which are 100% preventable<sup>21</sup>; and alcohol is responsible for 1 in 4 deaths among people aged 20–24<sup>22</sup>, significantly affecting life expectancy, productivity, and economic development later in life.

### Recommendations:

- **Phase out EU subsidies that support alcohol marketing, both within and outside the EU.**
- **Align EU wine policy with the goals of the Europe's Beating Cancer Plan and the WHO European Framework of Action on Alcohol 2022-2025 which was unanimously adopted by all Member States at the WHO Regional Committee for Europe in September 2022.**

<sup>16</sup> [https://ec.europa.eu/commission/presscorner/detail/pl/qanda\\_21\\_1902](https://ec.europa.eu/commission/presscorner/detail/pl/qanda_21_1902)

<sup>17</sup> [https://commission.europa.eu/document/download/de79fb8e-4cc1-45a0-ac34-72f73a5147ca\\_en?filename=BRT-2023-Chapter%203-Identifying%20impacts%20in%20evaluations%20fitness%20checks%20and%20impact%20assessments.pdf](https://commission.europa.eu/document/download/de79fb8e-4cc1-45a0-ac34-72f73a5147ca_en?filename=BRT-2023-Chapter%203-Identifying%20impacts%20in%20evaluations%20fitness%20checks%20and%20impact%20assessments.pdf)

<sup>18</sup> <https://www.who.int/europe/news/item/14-02-2025-alcohol-labels-should-warn-of-cancer-risk--says-new-who-europe-report#:~:text=A%20WHO%2FEurope%20study%20featured,its%20link%20to%20colon%20cancer.>

<sup>19</sup> <https://www.who.int/europe/news-room/fact-sheets/item/alcohol-use#:~:text=Alcohol%20is%20a%20toxic%2C%20psychoactive,total%20of%202.6%20million%20deaths>

<sup>20</sup> *Ibidem*

<sup>21</sup> <https://alcoholandsociety.report/when-less-is-more/>

<sup>22</sup> <https://www.who.int/europe/news-room/fact-sheets/item/alcohol-use#:~:text=Alcohol%20is%20a%20toxic%2C%20psychoactive,total%20of%202.6%20million%20deaths>

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