

AER Foundation Policy Position Paper

ALCOHOL PRODUCT LABELLING: Health Warning Labels and Consumer Information



The Alcohol Education and Rehabilitation Foundation (the AER Foundation) is an independent, charitable organisation working to prevent the harmful use of alcohol in Australia. Since 2001, the Foundation has invested over \$115 million in research and community projects that aim to address the impact of alcohol misuse on Australians. Through our national grants program and commissioned research, the Foundation has established itself as a leading voice on alcohol.

One of the Foundation's priorities is to advocate for evidence-based alcohol policy reform in Australia. The Foundation promotes population-wide strategies to reduce alcohol-related harm in the areas of pricing and taxation, product labelling, availability and accessibility, promotion and marketing, and child and maternal health.

In order to achieve our mission to improve the health and wellbeing of the Australian community by minimising alcohol-related harm, we work closely with community groups, all levels of government, police, emergency workers, research institutions and the private sector.

For more information about the Foundation please go to www.aerf.com.au

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THE CASE FOR IMPROVED ALCOHOL PRODUCT LABELLING

- Alcohol product labelling provides an opportunity to promote health warnings at the point of sale and the point of consumption in a way that other health promotion initiatives do not.

- Alcohol products should be subject to at least the same regulatory requirements as food products to ensure that the consumer is appropriately informed in accordance with Australian Consumer Law and more specific food labelling laws. The provision of such information is particularly important given the harmful consequences associated with excessive alcohol consumption.

- Australian alcohol producers are already applying health warning labels to products sold in countries which require the mandatory application of warning labels, including France and the United States of America (USA).

- International research on health warning labels has found that they are effective both in raising awareness of health risks and changing health behaviours when applied in accordance with specific guidelines that are known to increase salience.¹

- Health warning labels on alcohol are popular with the Australian community² and inexpensive to implement.³

- The *Labelling Logic* report⁴ and the National Preventative Health Taskforce (the Taskforce) both recommend improvements to alcohol product labelling.⁵

- Health warning labels and additional consumer information on alcohol products effectively address the higher end of the 'Food Labelling Issues Hierarchy', used in the *Labelling Logic* report, as they pertain to food safety and preventative health measures.⁶

- Labelling is just one part of a comprehensive approach to alcohol policy reform aimed at preventing harm. To address alcohol-related harms, a range of population-wide initiatives are required that address the price, availability and promotion of alcohol.

A NEW APPROACH TO ALCOHOL PRODUCT LABELLING

Health Warning Labels

- Health warning labels should be mandatory on all alcohol products and product packaging in Australia.
- There should be at least five different health warning messages and one of the health warning messages must relate to the risks of drinking alcohol during pregnancy. The warning messages should be rotated to ensure that consumers are exposed to a variety of messages.
- Health warning labels should comprise of both text and symbol. This will ensure that the health warning messages reach a broad audience and are understood by consumers with a range of literacy levels and consumers that come from culturally and linguistically diverse backgrounds.
- The size, font and application of health warning labels should be consistent on all alcohol products.
- Health warning labels should be placed on the front of the alcohol product container, horizontally oriented and separated by a prominent black border.
- Health warning labels must occupy a specific percentage of the container's surface, determined by the size of the container, product label size, and noticeability. A minimum size of font and label should be specified to ensure visibility.
- Health warning messages should be preceded by the text 'HEALTH WARNING'.
- In order to target the largest number of people, health warning messages should cover a range of alcohol-related harms, including short-term and long-term harms, social harms, and the harms caused by alcohol to people other than the drinker.
- The implementation of health warning labels should be accompanied by a comprehensive public education campaign, using various forms of media.
- Health warning labels should be evaluated for their effect on attitudes and behaviours and should be reviewed at least every three years.

Nutrition Information Panels

- Alcohol product labels should comply with nutrition labelling requirements of other foods and beverages, including a mandatory nutrition information panel and a list of ingredients. The label should include the energy content per 100 mL.
- Alcohol producers should be prohibited from including any positive health claims on their products, including representations of products as "low" in alcohol or low in calories.

INTRODUCTION

This policy position paper provides a detailed proposal for the implementation of health warning labels and consumer information for all alcohol products sold in Australia. This includes the AER Foundation's position on two key areas relating to alcohol product labelling:

1. Health warning labels
2. Consumer information

The January 2011 release of the review of food labelling law in Australia and New Zealand, entitled *Labelling Logic*, provided the impetus for this policy position paper. Supported by the recommendations made by the Preventative Health Taskforce in 2009 in favour of alcohol product labelling, the time is now ripe for policy makers to introduce changes to alcohol product labelling.⁷

Alcohol product labelling is an important component of a comprehensive public health strategy to reduce alcohol-related harms. Labelling provides a unique opportunity for Government to disseminate health promotion messages at the point of sale and point of consumption. Alcohol is not an ordinary commodity, but rather a product that is known to cause a range of health and social harms. Therefore, alcohol products should be labelled to appropriately inform consumers of their contents and raise awareness of alcohol-related harm.

This position paper explains that for health warning messages to be effective in both increasing awareness of the risks associated with alcohol consumption and changing drinking behaviours in the long-term, health warning messages should be specific and unambiguous, targeted at specific types of harm, and phrased in such a way that attracts the attention of the drinker. Further, for health warning labels to have optimal salience they need to be consistent in the style of text, colour, clearly defined borders, placement and orientation of health warning labels on alcohol product labels.

This position paper also proposes that the implementation of health warning labels should be complemented by a broader public education campaign to reinforce the health messages and provide further information to consumers. A good example is the effectiveness of tobacco product labelling and the associated public education campaigns which enhance the messages and images placed on product packaging.⁸

Finally, this position paper seeks to examine the shortcomings in current food labelling laws in Australia as they pertain to alcohol. A series of proposals are made regarding mandating health warning labels and consumer information in order to ensure both adherence and consistency in implementation, thereby increasing the effectiveness of the labels in raising awareness and changing behaviours.

BACKGROUND

Alcohol-Related Harm in Australia

Alcohol is a major cause of preventable death, illness, injury, and hospitalisation, which costs the Australian economy \$36 billion annually.⁹ There is a causal relationship between alcohol and 60 types of disease and injury, including road fatalities, stroke, coronary heart disease, high blood pressure, some cancers, and pancreatitis. Alcohol accounts for 3.2% of the total burden of disease and injury, 3,430 deaths annually, and a loss of 85,435 disability adjusted life years (DALYs).¹⁰ It is estimated that 5,070 cases of cancer (or 5% of all cancers) can be attributed to long-term chronic use of alcohol each year in Australia. It is also estimated that 22 % of breast cancer cases in Australia are linked to alcohol consumption.¹¹

Despite the magnitude of these health risks, there are a large number of Australians who are not fully cognisant of the harms associated with alcohol use. The *2011 AER Foundation Annual Alcohol Poll* found that few Australians were aware that alcohol use is associated with mouth and throat cancer (24%), and even fewer people were aware of the link between alcohol and breast cancer (11%).¹²

Australians are also largely unaware of the *National Health and Medical Research Council's Guidelines to Reduce Health Risks from Drinking Alcohol* (NHMRC Guidelines). 54% of Australians surveyed reported having an awareness of the NHMRC Guidelines, but relatively few (12%) were aware of the content. Further to this, only 10% of all Australians surveyed were aware that the NHMRC Guidelines had been updated in 2009.¹³

Current Alcohol Labelling Requirements in Australia

Food Standards Australia New Zealand (FSANZ) is an independent statutory authority with responsibility for developing food standards, including standards in relation to food labelling. The *Australia and New Zealand Food Standards Code* (Food Standards Code) contains agreed standards for the regulation of food in Australia and New Zealand, including the labelling of alcoholic beverages.

In Australia, Standard 2.7.1 of the Food Standards Code outlines the requirements for the labelling of alcoholic beverages. Labelling under this Standard includes the following:

- declaration of alcohol by volume;
- standard drinks labelling;
- alcohol products above 1.15% alcohol by volume are not to be described as 'low' alcohol products;
- alcohol products above 0.5% alcohol content by volume are not to be represented as 'non-intoxicating'; and
- food containing alcohol is not to be represented as non-alcoholic.

Two Standards within the Food Standards Code, 1.2.4 and 1.2.8, indicate that alcohol products are exempt, either wholly or in part, from requirements common to most other food and beverage labelling, including listing ingredients, and nutrition information panels.

Standard 1.2.4, entitled *Labelling of Ingredients*, sets out specific requirements for food and beverage products to provide a statement of ingredients.¹⁴ However, alcoholic beverages standardised in Standards 2.7.2 to 2.7.5 are exempt from having to provide this information.

Standard 1.2.8, entitled *Nutrition Information Requirements*, sets out the nutritional information requirements and the manner in which this information is to be provided. This includes nutrition information panels containing the number of servings, energy content, and fat content of a product. This Standard exempts all alcoholic beverages, including those not standardised in Part 2.7 of the Food Standards Code, from having to display this information.

The exemptions highlighted above cannot be justified, given that most other food and beverage products are subject to these requirements. In particular, the current lack of information on alcohol product labels and packaging goes against the concept that the consumer is entitled to be fully informed about the products they consume.

Review of Food Labelling Law and Policy

In 2010 the Australia and New Zealand Food Regulation Ministerial Council (the Ministerial Council) undertook a comprehensive review of food labelling law and policy in Australia and New Zealand. Dr Neal Blewett AC led the review which explored the information, representations, and claims about food regulated under the Food Standards Code. The final report, *Labelling Logic*, was presented to the Ministerial Council on 28 January 2011. *Labelling Logic* made four key recommendations on alcohol product labelling:

Recommendation 24: That generic alcohol warning messages be placed on alcohol labels but only as an element of a comprehensive multifaceted national campaign targeting the public health problems of alcohol in society

Recommendation 25: That a suitably worded warning message about the risks of consuming alcohol while pregnant be mandated on individual containers of alcoholic beverages and at the point of sale for unpackaged alcoholic beverages, as support for ongoing broader community education

Recommendation 26: That energy content be displayed on the labels of all alcoholic beverages, consistent with the requirements for other food products

Recommendation 27: That drinks that are mixtures of alcohol and other beverages comply with all general nutrition labelling requirements, including disclosure of a mandatory Nutrition Information Panel¹⁵

The AER Foundation supports the recommendations from *Labelling Logic* and has used these recommendations as the basis for this policy position paper. The AER Foundation supports recommendations 24 and 25 of *Labelling Logic* in part, and proposes warning messages that are specific and part of a suite of messages so that they maintain their resonance and do not become worn out. In addition, there should always be one warning label among the suite of messages that addresses the risks of consuming alcohol during pregnancy. The AER Foundation supports recommendation 26 in full, which specifies that alcohol products should be mandated to display their energy content, as are other beverages. Finally, the AER Foundation supports recommendation 27 in part, and contends that all alcohol products should be required to include a Nutrition Information Panel. The AER Foundation also supports the introduction of an ingredients list on all alcohol products.

The recommendations of the *Labelling Logic* report further support the National Preventative Health Taskforce (the Taskforce) recommendations made in 2009. The Taskforce's report, *Australia: The Healthiest Country by 2020*, expressed support for health warning labels on alcohol products. The report states that labels would be effective if they follow a similar formula to tobacco warning labels and are supported by a range of strategies under a public education campaign, designed to change drinking behaviours.¹⁶

HEALTH WARNING LABELS

Internationally, at least eighteen countries or territories have introduced laws requiring the compulsory use of health warning labels on alcohol products.^{17 18 19} These countries include France, South Africa, Brazil, Costa Rica, Ecuador, Honduras, Mexico, South Korea and the USA. The primary purpose of these messages is to communicate information regarding the harms that have been proven to result from alcohol use.²⁰ Examples of messages used on these labels include that alcohol 'may increase cancer risk' and 'can cause birth defects'.²¹ The messages displayed on alcohol products vary between countries, and a sample of these messages is provided in [Appendix A](#).

While Australian producers are not required to carry health warning messages on products sold in Australia, they are required to meet the mandated labelling requirements of other countries and apply health warning labels to products exported to these countries.

The majority of evidence on the effectiveness of health warning messages comes from the USA, where warning labels were introduced in 1989. The health warning label adopted in the USA is:

GOVERNMENT WARNING:

- (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects.
- (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.

Studies on the effectiveness of health warning labels in the USA have shown that their implementation has resulted in increased awareness of the health messages used on the labels.²² Awareness of the health warning labels was highest among groups deemed high risk, for example, young people and heavy drinkers. Recall was highest for the message regarding the risk of birth defects resulting from alcohol consumption during pregnancy.²³ Exposure to labels was also found to stimulate conversations about the risks of alcohol consumption.²⁴ Respondents also reported that they were less likely to have driven 'when they probably should not have'.²⁵

This increase in awareness of health warning labels in the USA has occurred despite the messages being small in size, having low visibility,²⁶ and the messages remaining unchanged since inception.²⁷ Some examples of the application of the health warning labels on various products in the USA are included in [Appendix B](#).

Requirements of Health Warning Labels

The effective application of health warning labels includes consideration of the number of health warning messages to be applied and the mandatory placement of labels on alcohol products (such as beer bottles or cans), and packaging (such as cartons containing beer). According to international research, the rotation of health warning messages is crucial in increasing the effectiveness of health warning labels. For example, studies in the USA that focused specifically on the effectiveness of the warning message regarding alcohol consumption during pregnancy found that while awareness of the labels increased during the first four years of implementation, levels of awareness then gradually declined at the five year mark in 1994 as consumers became familiar with the message and no longer took notice.²⁸

In addition to the number of health warning messages, another important requirement is the inclusion of a pictorial symbol to accompany the message text. Pictorial symbols make warning messages easier to comprehend and are particularly important in ensuring that the messages reach a wide audience with a range of literacy levels and consumers from culturally and linguistically diverse backgrounds. Consumers are also more likely to remember the warning when the message text is accompanied by a pictorial symbol.²⁹

Based on the current evidence, the AER Foundation proposes the following:

1. Health warning labels should be mandatory on all alcohol products and product packaging sold in Australia.
2. Health warning labels should comprise both text and a pictorial symbol.
3. There should be at least five different health warning messages.³⁰ One of the health warning messages must relate to the risks of drinking alcohol during pregnancy.
4. Health warning messages should be rotated to ensure even distribution of health warning messages across all alcohol products so that consumers are exposed to the full variety of health warnings.³¹
5. The health warning labels should be revised and refreshed on a regular basis in order to reduce habituation to the messages and to accommodate any new evidence regarding alcohol-related harm which may emerge.³² In the first instance, we propose that the labels are reviewed at the end of the first year of implementation. Following initial evaluations, we propose that the labels are revised and refreshed at least every three years.³³
6. Health warning labels should also be applied to:
 - all promotional materials relating to alcohol products; and
 - all alcohol product advertisements displayed on television, the internet and other forms of media. The health warning messages should be the same as those used on alcohol product containers and the same rotation and revision requirements should be applied.³⁴

Format of Health Warning Labels

The format of health warning labels concerns the physical presentation of the label. International research on how best to draw the attention of the consumer to a warning label emphasises the importance of consistency in application to ensure that the warning labels are clearly noticeable to the consumer.^{35,36} Evaluations of the effectiveness of tobacco warning labels have further supported the evidence regarding the use of a consistent font and size of text, colour, and a clearly defined border around the warning message, placement and orientation of the label.³⁷

Based on the current evidence, the AER Foundation proposes the following:

7. The size, font and application of health warning labels should be consistent on all alcohol products.
8. Health warning labels should:
 - be placed on the front of the alcohol product container. For products sold in a can, this would mean the side of the container which advertises the name of the specific product;^{38,39}
 - be horizontally oriented;⁴⁰
 - occupy a specific percentage of the container's surface, determined by the size of the container, product label size, and noticeability. Specifications about the size of the health warning label will need to take into consideration the different sizes of alcohol product containers and a minimum size of font and label to ensure visibility. For example, for a wine bottle this may mean that the health warning label takes up at least one third of a typical product label, providing that the area is big enough for the label to be easily read;⁴¹
 - have a prominent black border separating the warning message from the rest of the label; and
 - have black text against a white background, bold and at least 3mm high.⁴²

Content of Health Warning Messages on Health Warning Labels

The content of the messages relates to the information, wording and tone of the health warning messages. According to an analysis of current evidence-based research on alcohol product labelling, the use of specific warning messages is more effective than the use of generic warning messages.⁴³ Specific warning messages highlight a causal link between alcohol consumption and a specific harm, for example, 'drinking alcohol harms your liver'.⁴⁴ Alternatively, a generic warning message warns of the general consequences of alcohol use, for example, 'drinking alcohol can harm your health'.⁴⁵ Specific warning messages have been found to be more effective because they are unambiguous, convey a vivid message, and elicit an emotive response in the consumer, whereas, generic warning messages are vague and ambivalent in nature.⁴⁶

The suggestions below regarding the content of health warning messages were informed by research carried out in Australia on potential alcohol product health warning messages.

Based on the current evidence, the AER Foundation proposes the following:

9. All messages should be preceded by the text HEALTH WARNING.⁴⁷ This text needs to be capitalised, larger than the warning message and be separated from the message by a single space.
10. The language and tone of the health warning messages should be:
 - simple, clear and direct;⁴⁸
 - strong and active (eg. 'will' increase your risk) and personalised ('you' or 'your');⁴⁹
 - educative and informative in tone;⁵⁰
 - factual and evidence based;⁵¹
 - inclusive of new information where possible;⁵² and
 - based on the specific risks associated with alcohol consumption.⁵³
11. In order to target the largest number of people, health warning messages should cover a range of alcohol-related harms, including short-term and long-term harms, social harms, and the harms caused by alcohol to people other than the drinker.⁵⁴
12. Health warning messages should be accompanied by a recommendation for action. For example, "If you are concerned about your alcohol consumption, call [appropriate help line and phone number] or visit [appropriate website]".⁵⁵ This message should be in smaller font than the health warning message.
13. Health warning labels should be tested with a range of audiences prior to implementation to ensure they are understood and interpreted correctly, taking into consideration a range of literacy levels.

Five proposed health warning labels have been developed based on the above proposals and are included as [Appendix C](#).

Implementation of Health Warning Labels

Implementation refers to the introduction and phase-in of health warning messages. The cost of implementing health warning labels is low. A report by PricewaterhouseCoopers for FSANZ estimated the cost of changing labels for each unique alcohol product, also referred to as the stock keeping unit (SKU). It found that the cost of implementing 'medium'⁵⁶ changes to labels was AUD\$9,664 per SKU for products packaged in a glass bottle, with the cost of making 'major'⁵⁷ labelling changes to the same packaging estimated at AUD\$12,787 per SKU.⁵⁸

There is also a need for warning labels to be mandatory and government regulated. Voluntary alcohol product labelling regimes have been found to be ineffective, for example the voluntary system of regulation in the United Kingdom (UK). In May 2007 the UK Department of Health entered a voluntary agreement with the alcohol industry to include alcohol unit and health information on alcohol containers.⁵⁹ A study conducted on a sample of United Kingdom (UK) alcohol labels demonstrated that without mandated regulations, about one-third of the alcohol producers did not include any health warning messages on their labels. Those alcohol producers who did apply labels to their products were found to be manipulating the message so that it incorporated the brand name (e.g. Drink *brand name* responsibly), promoted the product (e.g. Please take as much care enjoying our beers as we do brewing them. Drink sensibly), or softened the message (e.g. adding the word 'please' as above). Furthermore, the labels examined took up on average only 1.2% of the total printable area and sometimes had poor legibility, for example, shiny or metallic backgrounds.⁶⁰

The ineffectiveness of voluntary alcohol industry regulation can also be demonstrated in the Australian context, using the Alcohol Beverages Advertising Code (ABAC) as an example. A formal review of the alcohol industry's self regulation of advertising, carried out in 2003 by the National Committee for Review on Alcohol Advertising (NCRAA), found substantial flaws in the ABAC.⁶¹ The review found that many complaints were not investigated in a timely manner, some complaints were not investigated at all and very few complaints were upheld. Despite amendments to the ABAC, it still has substantial limitations in its application.

Based on the current evidence, the AER Foundation proposes the following:

14. Alcohol product health warning labels should be implemented and enforced through mandatory government regulation, not voluntary alcohol industry self-regulation. Mandatory regulation will ensure consistency in implementation and enforcement of penalties for non-compliance in accordance with the Australian Consumer Law.
15. Government should incur the costs of designing the labels. Alcohol producers should incur the costs of placing the health warning labels on their products and packaging.
16. Alcohol producers should be given up to 12 months to update their processes and include health information and warning messages on their products.

Comprehensive Public Education Campaign

Health warning labels are most effective when implemented as part of a comprehensive public education campaign that promotes the messages used within the warning labels. Such a campaign will allow for health warning messages to be reinforced, elaborated upon, and reach a wider audience of people who would not normally see the labels.⁶²

Based on the current evidence, the AER Foundation proposes the following:

17. A public education campaign that provides further information to support the health warning messages applied to alcohol products should begin immediately prior to the implementation of the labels. The public education campaign should be research-based and comprehensive, using a broad range of media.
18. The public education campaign should be funded by government and administered by the Australian National Preventive Health Agency.
19. The campaign should elaborate on the information contained in the health warning labels. For example, the message “Drinking alcohol increases your risk of developing cancers” can be supplemented by “The WHO International Agency for Research on Cancer classifies alcohol as *carcinogenic to humans*, a group one classification which is the highest classification available”.⁶³ This message should be concluded with a recommendation for action: For example, “If you are concerned about your alcohol consumption you can call [appropriate help line and phone number] or visit [appropriate website]”.
20. Posters and other print-based promotional materials should be displayed in alcohol venues to ensure that people are exposed to the health warning messages when they have not seen an alcohol product container, for example when they order a cocktail or a glass of wine.⁶⁴ The layout and format of the messages to be used in posters and other promotional material should be determined by Government to ensure consistency and prominence of messaging.

Evaluation and Review of Health Warning Labels

The implementation of health warning messages and the accompanying public education campaign should be subject to a strict evaluation and review process. Evaluations should consider the effect of these policies on changing both attitudes and behaviours.⁶⁵ Evaluations of the tobacco labelling experience and associated public education campaigns have led to numerous changes to improve the effectiveness of health warning labels.⁶⁶ These changes have included a move to rotating messages, increasing the number of warning messages and the progression towards graphic warning labels, which have been shown to increase awareness and reduce rates of smoking.⁶⁷

Conversely, evaluations of alcohol product labelling are very limited and have centred on the USA experience to date. There is a pressing need to build the evidence base for what constitutes the most effective alcohol product warning labels in terms of not only raising awareness of the health risks, but also changing drinking behaviours. In order to obtain useful data, evaluations should take into account how the mandating of health warning labels interacts with other policy reforms and should also measure any fluctuations in public support for the policy.⁶⁸

Based on the current evidence, the AER Foundation proposes the following:

21. The effectiveness of health warning labels should be evaluated at baseline and at twelve month intervals following their implementation. This will assist with further developing the evidence base regarding alcohol product health warning labels.
22. Health warning labels should be evaluated in terms of their effect on alcohol-related attitudes and behaviours.⁶⁹

CONSUMER INFORMATION

Consumer information refers to the provision of information regarding the content of alcohol products. This can include ingredients and nutritional information such as fat and energy content. In accordance with the consumer protection provisions contained in Schedule 2 of the *Competition and Consumer Act 2010*, consumers are entitled to be informed of the content of the products they consume, including alcohol products, so that they can make informed choices about the products they choose to consume. In regards to alcohol products, this information should include information about ingredients and nutritional information. This position is also reflected in the *Food Standards Australia New Zealand Act 1991* which stipulates one of its objectives as being 'the provision of adequate information relating to food to enable consumers to make informed choices'.

Under the current Food Standards Code, all alcohol products are exempt from having to provide nutritional information and all alcoholic beverages standardised under Part 2.7 of the Code are exempt from having to display an ingredients list. The AER Foundation contends that this is unjustified and in direct contravention of the consumer's entitlement to be fully informed about the contents of the products they consume.

Nutrition information panels and ingredients listings equip the consumer with information, and carry great potential to be another successful harm minimisation strategy. There is widespread public support for the mandating of nutrition information panels and ingredients listings on alcohol products.^{70 71} This information is particularly relevant given that weight concerns are at the forefront of Australia's collective conscience⁷² and an estimated 6.4% of Australian adult males' and 3.4% of females' energy intake comes from alcoholic beverages.⁷³ With this in mind, there is a need for messaging to highlight both the long and short term effects of alcohol consumption in order to capture the attention of consumers who are more susceptible to immediate concerns, such as weight gain.

While it is important for alcohol products to carry appropriate consumer information, it is also important that alcohol product labelling does not contain statements, symbols or graphic images that may be interpreted as a positive health claim. Currently some beer products make the claim that they are 'low carb'. These claims have the potential to mislead consumers into perceiving the product as having positive health qualities when these products often have a similar level of kilojoules and alcohol content to ordinary beer.⁷⁴ A 2010 VicHealth Poll found that more than two thirds (71%) of people surveyed felt 'low carb' beer was a healthier alternative to full-strength beer. 38% of people thought 'low carb' beer was healthier than light beer and 44% of people felt that 'low carb' beer was less fattening.⁷⁵

Alcohol product labelling should be improved to at least the standards required of other food products in order to better inform consumers and address the current misconceptions among Australians about the contents of alcohol products. Examples of how additional consumer information should be applied to alcohol product labels are provided in [Appendix D](#).

Based on the current evidence, the AER Foundation proposes the following:

23. Alcohol products should be required to comply with the nutrition labelling requirements of other foods and beverages, including a mandatory nutrition information panel and full list of ingredients, in accordance with the Food Standards Code, Standards 1.2.8 and 1.2.4 respectively. This should include energy content per 100 mL.
24. Alcohol producers should not only be prohibited from representing their products as 'low' in alcohol, as per Standard 2.7.1, but the use of all variations or interpretations of the word 'low' should also be banned, such as 'lower'.
25. Alcohol producers should be prohibited from using language that may mislead consumers into perceiving alcohol products as having positive health qualities, such as, 'low carb' or 'low calorie'.⁷⁶

APPENDIX A:

Examples of International Health Warning Messages

USA

GOVERNMENT WARNING:

(1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects.

(2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.

Brazil

Avoid the excessive consumption of alcohol.

Colombia

Excess alcohol is damaging to your health.

Ecuador

Warning: the excessive consumption of alcohol causes serious harm to your health and endangers your family.

France

Drinking alcoholic beverages during pregnancy even in small quantities can have grave/serious consequences for the health of the baby; or

Use of the image of a pregnant woman shown below:



Germany

Sale prohibited to persons under 18 years of age.

South Korea

One of the below messages must be placed on alcohol beverage containers:

(a) Warning: Excessive consumption of alcohol may cause liver cirrhosis or liver cancer and is especially detrimental to the mental and physical health of minors. OR

(b) Warning: Excessive consumption of alcohol may cause liver cirrhosis or liver cancer, and especially, women who drink while they are pregnant increase the risk of congenital abnormalities. OR

(c) Excessive consumption of alcohol may cause liver cirrhosis or liver cancer, and consumption of alcoholic beverages impairs your ability to drive a car or operate machinery and may increase the likelihood of car accidents or accidents during work.

On all spirits containers:

Excessive drinking may cause cirrhosis of the liver or liver cancer and increase the probability of accidents while driving or working.

South Africa

One of the below messages must be placed on alcohol beverage containers:

- (1) Alcohol reduces driving ability, don't drink and drive.
- (2) Don't drink and walk on the road, you may be killed.
- (3) Alcohol increases your risk to personal injuries.
- (4) Alcohol is a major cause of violence and crime.
- (5) Alcohol abuse is dangerous to your health.
- (6) Alcohol is addictive.
- (7) Drinking during pregnancy can be harmful to your unborn baby.

**India
(State of Assam)**

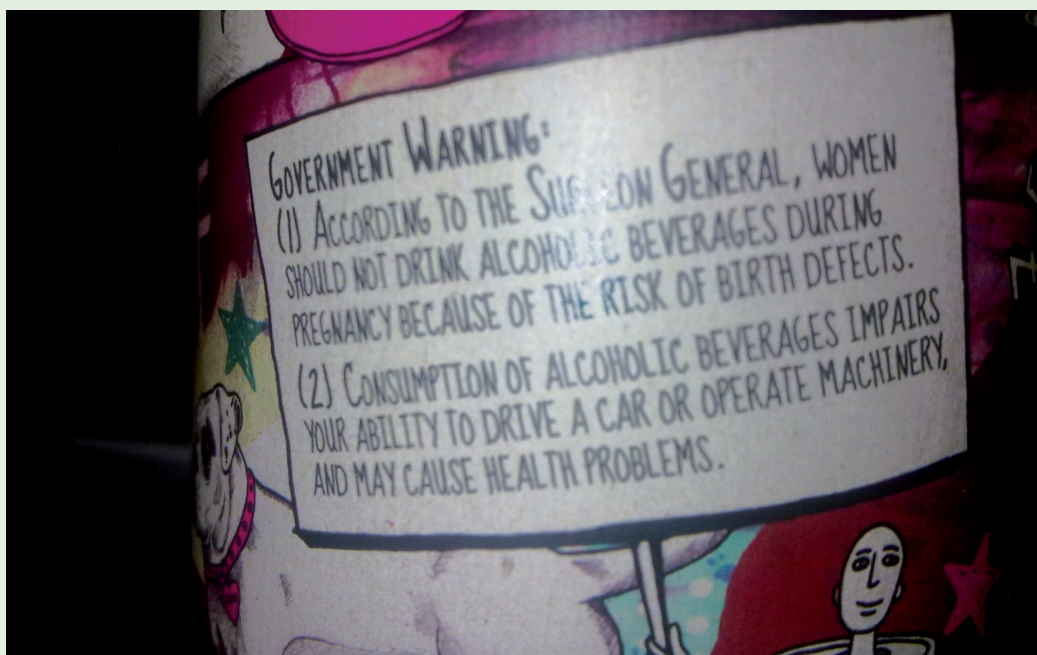
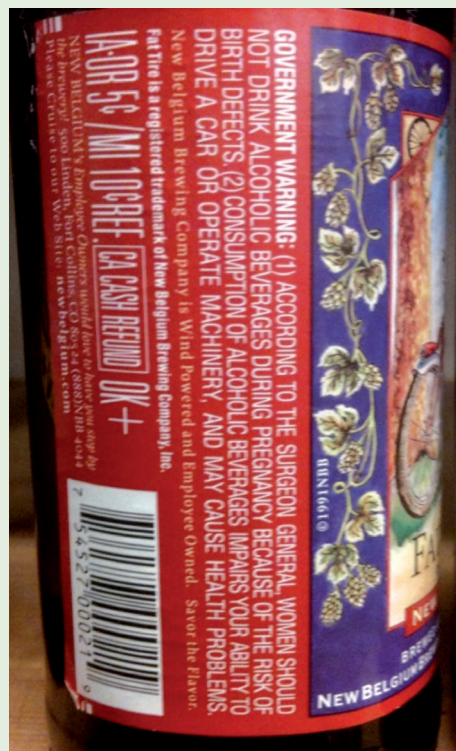
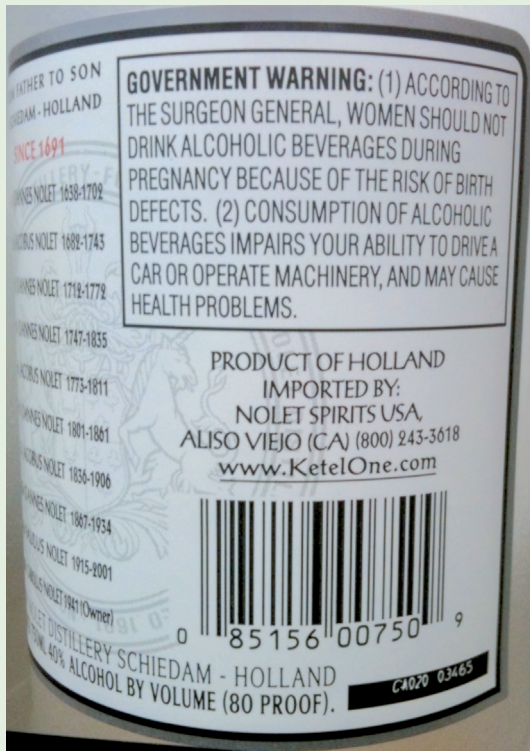
Consumption of liquor is injurious to health.

Thailand

One of the messages below must be placed on alcohol beverage containers in pictures and messages.

- (1) Liquor drinking may cause cirrhosis and sexual impotency.
- (2) Drunk driving may cause disability or death.
- (3) Liquor drinking may cause less consciousness and death.
- (4) Liquor drinking is dangerous to health and causes less consciousness.
- (5) Liquor drinking is harmful to you and destroys your family.

APPENDIX B: Examples of the USA Health Warning Label



APPENDIX C: Proposed Australian Health Warning Messages

Five proposed health warning labels to be implemented on alcohol products and packaging are included below. As explained within the policy position paper, the implementation of health warning labels should be accompanied by a broader public education campaign that builds on the health warning messages and further explains the risks associated with alcohol consumption.

1. Drinking any alcohol can harm your unborn baby.



2. Drinking alcohol increases your risk of developing cancers.



3. Drinking alcohol increases the risk of injury.

HEALTH WARNING



Drinking alcohol increases the risk of injury

If you are concerned about your alcohol consumption, call **xxxx xxx xxx** or visit **www.xxxxxxxxxx.gov.au**

4. Drinking alcohol and driving increases the risk of injury or death.

HEALTH WARNING



Drinking alcohol and driving increases the risk of injury or death

If you are concerned about your alcohol consumption, call **xxxx xxx xxx** or visit **www.xxxxxxxxxx.gov.au**

5. Drinking alcohol damages the young developing brain.

HEALTH WARNING




Drinking alcohol damages the young developing brain

If you are concerned about your alcohol consumption, call **xxxx xxx xxx** or visit **www.xxxxxxxxxx.gov.au**

APPENDIX D: Application of Consumer Information on Alcohol Product Labels

Three examples of alcohol product labels containing additional consumer information are provided below. These examples include ingredients lists and nutritional information panels with energy content.




Nutrition information
Servings per package: 1.5
Serving size: 250ml


	Quantity per serving	Quantity per 100ml
Energy	255kj	170kj
Protein	xg	xg
Fat, total	xg	xg
- saturated	xg	xg
Carbohydrate	xg	xg
- sugars	xg	xg
Sodium	xmg (mmol)	xmg (mmol)

INGREDIENTS: Water, barley, malt, hops, yeast
Product of Australia
Generic Ale Makers, 100 Plain Street, Green Meadow, New South Wales, Australia 2000

Best before: see bottle

Standard Drinks 1.5



5% ALC/VOL  10c REFUND AT COLLECTION DEPOTS WHEN SOLD IN SA

GENERIC WINE BRAND

Nutrition information
Servings per package: 7.5
Serving size: 100ml


	Quantity per serving	Quantity per 100ml
Energy	xkj	xkj
Protein	xg	xg
Fat, total	xg	xg
- saturated	xg	xg
Carbohydrate	xg	xg
- sugars	xg	xg
Sodium	xmg (mmol)	xmg (mmol)


INGREDIENTS: Grape tannin, water, sugar, food acids, yeast and yeast extract.
Traces of milk products, traditionally used in winemaking, may be present. Contains Sulphites.

Product of Australia
Generic Wine Makers Estate, 100 Plain Street, Green Meadow, New South Wales, Australia 2000

Best before: see bottle

Standard Drinks 7.6



12.9% ALC/VOL  10c REFUND AT COLLECTION DEPOTS WHEN SOLD IN SA



Nutrition information
Servings per package: 1.1
Serving size: 250ml

	Quantity per serving	Quantity per 100ml
Energy	xkj	xkj
Protein	xg	xg
Fat, total	xg	xg
- saturated	xg	xg
Carbohydrate	xg	xg
- sugars	xg	xg
Sodium	xmg	xmg

INGREDIENTS: Carbonated water, vodka, food acid, flavour, colour, sweetener, preservative
Product of Australia
Generic RTD Makers, 100 Plain Street, Green Meadow, New South Wales, Australia 2000

Best before: see bottle

STANDARD DRINKS 1.1 APPROX.



5% ALC/VOL  10c REFUND AT COLLECTION DEPOTS WHEN SOLD IN SA

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If you require further clarification on the proposals made in this position paper or wish to provide feedback please contact aerf@aerf.com.au or phone (02) 6122 8600.

