

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME****CODEX COMMITTEE ON FOOD LABELLING****44<sup>th</sup> Session***Asunción, Paraguay, 16 – 20 October 2017***DISCUSSION PAPER ON ALCOHOLIC BEVERAGE LABELLING****Prepared by WHO****1. Introduction**

The 19th Session of the FAO/WHO Coordinating Committee for Asia had considered a proposal to develop a regional standard for Makgeolli, a fermented beverage containing a small amount of alcohol, and agreed that a revised discussion paper on the development of this regional standard with more information and data would be a good basis for the Committee to start consideration on new work on this commodity (REP15/ASIA paras 104-111). If the Commission decides to develop this standard, it would create a precedent that can prompt similar proposals for developing standards for other types of alcoholic beverages. Without prejudice to developing a standard for any particular alcoholic beverage, a more global and comprehensive approach could be pursued by Codex in fulfilment of its objectives to protect consumers' health including through provision of information to consumers. In this regard, the base work already exists in the form of the Codex General Standard for the Labelling of Prepackaged Foods and related texts on labelling and claims. WHO has identified several possible areas that can be addressed by Codex such as definition of alcohol beverage and labelling information including alcohol content, ingredients, calories and associated health risks. WHO presented these examples at CCEXEC73 in June 2017 (REP17/EXEC2) and CAC40 in July 2017 (REP17/CAC) to discuss this further.

One of the objectives of Codex is the protection of consumers' health. Labelling of alcoholic beverages provides a unique opportunity not only to inform consumers about different ingredients in a beverage, its alcohol content and energy value, but also to inform consumers about the health risks associated with the products they are considering to consume. Alcohol beverage labelling can provide a rare opportunity to effectively disseminate health promotion messages and information about the risks associated with consuming alcoholic beverages at the points of sale and consumption, and, therefore, could be considered as part of a comprehensive strategy to reduce the harmful use of alcohol and thereby help protecting consumers' health.

Protection of populations at high risk of alcohol-attributable harm could be seen as an integral part of any Codex standard setting work on foods in international trade including beverages. Thus WHO presents this discussion paper and draft project document to stimulate discussion in the Committee on Food Labelling (CCFL).

**2. Rationale for proposed new work in Codex**

Alcohol consumption is deeply embedded in many societies, and alcoholic beverages are produced, distributed and consumed in most parts of the world. Worldwide close to 2 billion people aged 15+ years consumed alcohol during the past 12 months. Alcoholic beverages contain ethanol, which is a psychoactive and toxic substance with dependence producing propensity. Ethanol, when consumed in alcoholic beverages, has the potential to cause a range of disorders and health conditions associated with significant health and social burden. Alcohol impacts people and societies in many ways, and the harm caused by alcohol is determined by the volume of the alcohol consumed, the pattern of drinking and, on some occasions, the quality of alcohol consumed. Worldwide, it is estimated that 3.3 million deaths every year result from harmful use of alcohol, this represent 5.9 % of all deaths. Overall 5.1 % of the global burden of disease and injury is attributable to alcohol, as measured in disability- adjusted life years (DALYs).

Providing consumer information and labelling of alcoholic beverages to indicate the harm related to alcohol is one of the policy options proposed to Member States by the WHO Global Strategy to reduce the harmful use of alcohol, which was endorsed by the World Health Assembly (WHA) in 2010 (resolution WHA63.13). Furthermore, the Global Action Plan for the prevention and control of noncommunicable diseases (NCDs) 2013- 2020 endorsed by WHA in 2013 (resolution WHA66.10) highlights harmful use of alcohol as one of the four key risk factors for noncommunicable diseases and calls for at least 10% relative reduction in the harmful use of alcohol, as appropriate, within the national context. Reducing harmful use of alcohol is also in integral part of the health goal in the UN 2030 Agenda for Sustainable Development. The inclusion of target 3.4; strengthen the prevention and treatment of substance abuse, including harmful use of alcohol, further illustrates and acknowledges the important role of reducing the harmful use of alcohol globally.

The 2013 WHO Global Action Plan for the prevention and control of NCDs contains a menu of policy options and cost-effective interventions to assist Member States in implement actions for prevention and control of major NCDs including on harmful use of alcohol. An updated list of the most effective and complementary policy options for prevention and control of NCDs (contained in Appendix 3 to the 2013 Global Action Plan for the prevention and control of NCDs) was recently endorsed by the Seventieth World Health Assembly in May 2017 through resolution WHA70.11. To provide consumer information about, and label alcoholic beverages to indicate, the harm related to alcohol was included in the list of recommended strategies and interventions for Member States to use in the updated appendix.

At the regional level, the WHO European Action Plan to reduce the harmful use of alcohol 2010-2020, agreed upon by the WHO Regional Committee for Europe in 2011 through resolution EUR/RC61/R4, states that "Product labelling similar to that used for foodstuffs, including alcohol and calorie content, additives, allergens etc, can be introduced where possible".

**Health warning labels should be placed on all alcoholic beverage containers as part of broader communication and point-of-purchase health campaigns to reduce the harmful use of alcohol. Once phased in, alcohol warning or information labels cost very little and, at the very least, remind consumers and society at large that alcohol is no ordinary commodity. In line with the provision of information on ordinary foodstuffs, alcoholic beverage labels should state the alcohol content in an easily understood manner and state the Member State's guidelines for men and women. The ingredients relevant to health, including the calorie content, should be listed and in general labelling should be introduced like that used for other foodstuffs, in order to ensure that consumers have access to complete information on the content and composition of the product for the protection of their health and interests.**

#### **WHO European Action plan to reduce the harmful use of alcohol 2010-2020**

Codex has developed standards for food additives (CODEX STAN 192-1995) and *Code of Practice for the Prevention and Reduction of Ochratoxin A Contamination in Wine* (CAC/RCP 63-2007). Codex has also set the *General Standard for the Labeling of Pre-packaged Foods* (CODEX STAN 1-1985), *General Guidelines on Claims* (CAC/GL 1-1979) as well as *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997) which also apply to alcoholic beverages. Codex has never set a commodity standard for an alcoholic beverage. Without prejudice to a new work proposal to develop a regional standard for Makgeolli, that, if approved, developed and adopted, could set a precedence for future Codex standards for alcoholic beverages, generic labelling provisions applicable to alcoholic beverages can be developed so that future Codex commodity standard can refer to such provisions in their labelling sections. Comparable approaches have already been taken in the *Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants* (CODEX STAN 72-1981) – marketing provisions – and in the *Standard for Natural Mineral Waters* (CODEX STAN 108-1981) – warning on high fluoride content products.

In the European Union, for instance, it is mandatory to label the actual alcoholic strength by volume for beverages containing more than 1,2% by volume of alcohol. Alcoholic beverages are also prohibited to bear health claims and the only permitted nutrition claims are the ones referring to low alcohol levels and reduction of alcohol or energy content. When such nutrition claims are made, the nutrition declaration is required. The EU Regulation on the provision of food information to consumers which became applicable in December 2014 includes rules on listing ingredients and providing a nutrition declaration. These rules are mandatory for all foods, including alcoholic beverages. There is an exemption, however, for beverages containing more than 1.2% alcohol per volume. Similar regulations are emerging in other regions and countries, and it may be timely for Codex to take a lead in developing a common set of principles internationally, to avoid diversification of regulations.

Harmful use of alcohol is a leading risk factor for mortality and morbidity globally and there has been a considerable development of global and regional strategies, actions plans and broader frameworks with the aim to reduce this burden. Labelling of alcoholic beverages is an integral part of many of these instruments, but a more concerted and comprehensive approach is needed to better understand and guide future developments when it comes to labelling of alcoholic beverages and the ways in which this can contribute to protecting public health and the individual consumer.

### **3. Scope of proposed work**

Consumers and potential consumers should be able to make informed choices about the products they may purchase and consume, and countries have an obligation to ensure that individuals are able to do so. In addition, there is also a growing acceptance of the key role that Member States play in positively influencing consumers' dietary choices. A range of preventative health approaches, including food labels where appropriate, are available in this regard. Alcohol beverages labelling regulation could be an important instrument for countries to reduce harmful use of alcohol and promoting healthier habits, and Codex is in an ideally positioned to guide the countries further in this regard.

There are several issues related to labelling of alcoholic beverages, which are listed below. Some of these issues clearly relate to the work of CCFL, while other issues, though related, may fall outside of the mandate of CCFL (indicated by \*).

- Definition of alcoholic beverages (i.e. minimal alcohol content)
- Standard(s) for alcoholic beverages(\*)
- Definition of a standard drink (\*)
- Product information:
  - Ingredients
  - Alcoholic strength
  - Number of standard drinks
  - Calories
  - Allergens
- Health warnings
  - Carcinogenicity
  - Intoxicating effects
  - Dependence potential
  - Children and adolescents
  - Pregnancy
- Restrictions on nutrition labelling and claims
- Restrictions on the misleading, deceptive and marketing information and packaging presenting risks to health

CCFL may choose to tackle all or part of these issues as new work, with the exception of those which clearly do not fall under its mandate.

### **4. Recommendations**

Thus CCFL is invited to discuss possible new work on alcohol beverage labelling with objectives to inform consumers about the products they consume or plan to consume and protect their health, and with an ultimate goal to benefit public health worldwide. The attached draft project document (Annex 1) is meant to facilitate discussion and analysis of the issues and should be modified as necessary and appropriate by Member States wishing to bring this work forward and/or by CCFL itself before eventual submission to CCEXEC and CAC.

## ANNEX 1

**DRAFT PROJECT DOCUMENT FOR NEW WORK ON ALCOHOL BEVERAGE LABELLING****Proposed amendments to *General Standard on Labelling of Prepackaged Foods (CODEX STAN 1)*  
and *Guidelines for Use of Nutrition and Health Claims (CAC/GL 23)*****1. PURPOSE AND SCOPE OF THE NEW WORK**

The scope of this new work is to consider the role for Codex in providing guidance on labelling of alcoholic beverages to governments with the aim of public health protection, especially protecting health of populations at high risk of alcohol-attributable harm. In addition, consumers of alcoholic beverages should be informed about the health risks associated with the products they consume or plan to consume, the different ingredients in the beverage, allergens, its alcoholic strength and content and energy value.

New provisions can be primarily developed as an additional section in the *General Standard on Labelling of Prepackaged Foods (CODEX STAN 1-1985)*, to follow immediately the existing section on the labelling of irradiated food (section 5.2). Other forms (e.g. a separate Codex guideline) could be considered depending on the structure and volume of new provisions and the ease of reading of the existing and new Codex standards and guidelines. Consequential and related amendments may need to be proposed to the *Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)* and other relevant texts.

**2. RELEVANCE AND TIMELINESS**

Alcohol is a psychoactive, toxic and dependence producing substance with considerable negative effect on the global health burden. Alcoholic beverages are exempted from international conventions that govern all other psychoactive substances with considerable implications for public health. Alcohol is also are exempted from key food legislations that requires labelling of ingredients and nutritional information. For consumers, the alcohol label is the principal source of information at the point of sale. Adding alcohol content, nutritional information and health warning labels to alcohol containers is an important first step in raising awareness and establish a widespread social understanding of the harm due to use of alcohol. Appropriate alcohol beverage labelling could be considered as a component of a comprehensive public health strategy to reduce alcohol-related harm. Codex could be one potential platform for further work in this area

**3. MAIN ASPECTS TO BE COVERED**

The main aspects to be covered in the proposed new work could include:

- a. Proposed amendments to *General Standard on Labelling of Prepackaged Foods (CODEX STAN 1)*
  - Definition of alcoholic beverages (i.e. minimal alcohol content)
  - Product information
  - Health warnings
  - Restrictions on information and packaging presenting risks to health (other than nutrition labelling and health claims)
- b. Proposed amendments to the *Guidelines for Use of Nutrition and Health Claims (CAC/GL 23)*
  - Restrictions on nutrition labelling and health claims
- c. New Codex Guideline
  - Restrictions on information and packaging presenting risks to health (other than nutrition labelling and health claims)

**4. ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIES****General criterion**

Labelling of alcoholic beverages will improve protection of consumer by better informing them about potential health risks involved with the products they are planning to purchase and consume. A common set of standards could also remove barriers to trade.

**Criteria applicable to general subjects**

- (a) *Diversification of national legislations and apparent resultant or potential impediments to international trade.*

Regulations on labelling of alcoholic beverages are emerging in many countries. In order to avoid diversification of regulations, it will be timely for Codex to take a lead in agreeing on the common set of principles internationally. Different approaches being adopted across countries would force exporters to meet multiple sets of labelling provisions based on the requirements of the importing partners. Diversification of regulations would also mean that the public health would not be equally protected across national borders.

*(b) Scope of work and establishment of priorities between the various sections of the work.*

All the aspects of the work, as detailed in the Section 3 above, can be undertaken simultaneously to produce a coherent set of standards for the Labelling of alcoholic beverages.

*(c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies).*

Providing consumer information and labelling of alcoholic beverages to indicate the risks related to alcohol is one of the policy options WHO is recommending to their Member States. Codex is the relevant intergovernmental body responsible for developing international standards in this area and we are not aware of any other international organization working in this area at the global level. The EU Regulation on the provision of food information to consumers includes rules on listing ingredients and providing a nutrition declaration. These rules are mandatory for all foods, including alcoholic beverages. There is an exemption, however, for beverages containing more than 1.2% alcohol per volume and currently the EU encourages the alcoholic beverage industry to come up with a set of voluntary restrictions. The European Commission has invited the industry to respond to consumers' expectations and present by March 2018 a self-regulatory proposal that would cover the entire sector of alcoholic beverages. It is therefore timely for Codex to start new work.

*(d) Amenability of the subject of the proposal to standardization.*

Most member countries, and more specifically the developing countries, base their labelling requirements on relevant Codex standards. The purpose of the new work is to develop clear and unambiguous labelling requirements for alcoholic beverages. The labelling requirements of alcoholic beverages can be effectively standardized with the involvement of and inputs from the Codex members.

*(e) Consideration of the global magnitude of the problem or issue.*

Harmful use of alcohol represents one of the most important risk factors for the global burden of disease and injuries. Alcohol consumption is a causal factor in over 200 health conditions, including mental and behavioral disorders, major noncommunicable diseases (NCD), road traffic crashes, violence and suicides. The harmful use of alcohol has also a significant impact on the development and treatment outcomes of some major infectious diseases such as tuberculosis and HIV/AIDS. We are also starting to get a much better understanding of the impact that harmful use of alcohol can have on other people than the drinker, and sometimes this impact is devastating.

## **5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES**

One of the primary strategic objectives of the Codex Alimentarius Commission is to protect the health of consumers and to promote the coordination of all food standards work undertaken by international governmental and non-governmental organizations. Alcohol beverages are included in the scope of products under consideration by Codex. At the same time alcohol use is associated with well-documented risks to health, and consumers of alcohol beverages have the right to be informed about different ingredients in a beverage, its alcohol content and energy value, but also about the health risks associated with consumption of alcohol beverages. Hence, the international work on alcohol beverage labelling can be legitimately considered as of direct relevance to Codex strategic objectives.

## **6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENTS**

Codex has developed standards for additives (CODEX STAN 192-1995) and a code of practice to reduce contaminants in wine (CAC/RCP 63-2007). Codex has also set labelling provisions for all pre-packaged foods (CODEX STAN 1-1985), guidelines on claims (CAC/GL 1-1979) and guidelines on nutrition labelling (CAC/GL 2-1985), as well as guidance on nutrition and health claims (CAC/GL 23-1997). Codex has never set a commodity standard for an alcoholic beverage and a new work proposal for Makgeolli would set a precedence for future Codex standards for alcoholic beverages.

## **7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE**

None identified at this stage. There will be opportunity to consult with relevant bodies if necessary throughout the process. In parallel, CCFL may wish to request a survey of existing national legislation and regulations in the area of alcoholic beverage labelling as relevant to the new work.

**8. NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES**

None identified at this stage.

**9. PROPOSED TIMELINE:**

October 2017	Agreement on new work by CCFL
June 2018	Critical review of project document by CCEXEC
July 2018	Approval of new work by CAC
July 2018	Establishment of electronic working group operating under CCFL to develop proposed draft amendments to CODEX STAN 1 and other related texts (e.g. CAC/GL 23) at Step 2
January 2019	Circulation of the proposed draft amendments for comments at Step 3
April/May 2019	Consideration of the proposed draft amendments by CCFL at Step 4
July 2019	Consideration by CAC at Step 5
October 2020	Consideration of the draft amendments by CCFL at Step 7
July 2021	Final adoption by CAC at Step 8