



Department  
of Health &  
Social Care

# **The Government response to the consultation on low alcohol descriptors**

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# 1. Introduction

- 1.1 The Department of Health and Social Care in England held a public consultation from 15 March to 10 May 2018 to seek views on the four low alcohol descriptors previously set out in legislation under the Food Labelling Regulations 1996, and if they could be effectively communicated through guidance rather than legislation. The consultation also covered if the Government should introduce new descriptors for alcoholic drinks above 1.2% ABV (alcohol by volume) to help consumers make an informed choice and to promote lower strength drinks.
- 1.2 This document outlines a summary of the consultation responses and the Government's response. In general, the responses to the consultation:
- Supported using guidance on future descriptors rather than legislating.
  - Supported keeping existing descriptors for low alcohol at 1.2% ABV and below (although there were varying views over whether to widen the scope of the “non-alcoholic” descriptor in particular), and
  - Provided no new evidence to support the introduction of new descriptors above 1.2% ABV.

## 2. Consultation process and overview

- 2.1 [The consultation on the Low Alcohol Descriptors](#) ran from 15th March to 10th May and was taken forward in accordance with the [Cabinet Office Consultation Principles](#).
- 2.2 The consultation paper was made available on the gov.uk website.
- 2.3 The Department received 140 consultation responses from individuals and organisations. Responses were submitted via the digital platform 'Citizen Space', email and by post. Not all respondents answered all the questions and seven provided a generic response not specific to the questions asked but their views were reflected on.
- 2.4 Of those who responded, 69% identified themselves as individuals with 29% responding on behalf of an organisation, 2% did not answer. A detailed breakdown of how respondents identified themselves can be seen in Tables 1,2, 3 and 4 below.

**Table 1: Breakdown of all responses received from Profession**

Category	Number of respondents	%
NHS or Healthcare Delivery	10	8%
Social Care	3	2%
Government/Civil Service	6	5%
Private Sector	53	40%
Other-Public Sector	9	7%
Charity/Third Sector	8	6%
Retired	19	14%
Student	2	2%
Other	20	15%
Not answered	3	2%
Total	133	100%

**Table 2: Breakdown of all responses received from those that identified as individuals**

Category	Number of respondents	%
NHS or Healthcare Delivery	9	10%
Social Care	3	3%
Government/Civil Service	5	5%
Private Sector	35	38%
Other-Public Sector	6	7%
Charity/Third Sector	2	2%
Retired	19	21%
Student	2	2%
Other	9	10%
Not answered	2	2%
Total	92	100%

**Table 3: Breakdown of all responses received that identified as organisations**

Category	Number of respondents	%
NHS /Health Service Delivery	1	3%
Government/Civil Service	1	3%
Charity	6	15%
Public Sector	3	8%
Private Sector	18	46%
Other	10	26%
Total	39	100%

**Table 4: Breakdown of all responses received from those that did not answer**

Category	Number of respondents	%
Not Answered	1	50%
Other	1	50%
Total	2	100%

In the 'Analysis by Question' chapter of this document, we have provided a breakdown of the responses and a snapshot of the key themes.

# 3. Analysis by Question

## Question 1: Guidance or legislate

**Question 1: Do you agree with the Government's preferred option of providing guidance working with industry and other stakeholders to describe low alcohol descriptors rather than legislate after 13 December 2018?**

**Yes or No? If no please provide a reason why?**

### Background

- 3.1 The Government policy to reduce burdens on industry means that legislation should be a last resort, once departments have demonstrated that satisfactory outcomes cannot be achieved by non-legislative approaches.
- 3.2 In line with this approach, the Government's preferred method would be to work with industry and other stakeholders to produce guidance on which descriptors should be used to describe low alcohol drinks. It believes that this approach would be as effective as the current regulations and provide more flexibility to respond to possible future policy changes.
- 3.3 The Government was mindful however, that the low alcohol descriptors have been defined in secondary legislation since 1996. There may be concerns from the public that in the absence of legislation for descriptors the alcohol industry may create their own descriptors and apply these to a level beyond 1.2% ABV. This is a legitimate concern. However, the absence of legislation does not mean an absence of regulation. This regulatory gap is to be filled by producing guidance which we would expect the alcohol industry to adhere to and follow. To further mitigate this risk, the Government would still expect the relevant enforcement authorities to refer to the guidance when assessing whether any descriptor was misleading. Where applicable, the Government would also expect the Courts to have regard to the guidance in proceedings before them.
- 3.4 There will continue to be a legal framework around labelling of low and non-alcoholic products. It will continue to be an offence for labels to be misleading under s15 (1) of the Food Safety Act 1990.
- 3.5 The Government also proposed to keep the proposed guidance under review and assess its impact after a 3-year period. If the guidance is not serving its intended

purpose, the Government will consider reintroducing legislation, and retains the power under The Food Safety Act 1990 to make such regulations.

**Table 5: Summary of all responses received to Question 1**

Response to Q1	Individuals		Organisations		Not Answered		Overall	
	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage
Yes	53	57%	20	51%	1	50%	74	56%
No	39	42%	19	48%	1	50%	59	44%
Total	92	100%	39	100%	2	100%	133	100%

3.6 Table 5 above shows that overall 56% of respondents are in favour of providing guidance to describe low alcohol descriptors rather than legislation after 13 December 2018. When responses were broken down, 57% of those that identified as individuals agreed with this proposal, which is marginally higher than the 51% of organisations who agreed.

3.7 Those who agreed with using guidance argued that:

- The industry has a strong track record of self-regulation.
- Self-regulation enables a faster process of adjustment to reflect changing market trends.

3.8 Those against argued that:

- This would cause confusion and contrary advice for consumers.
- There was a risk of misuse by industry.
- Guidance would be open to interpretation.



## Department response

- 3.9 Overall 56% were in favour to provide guidance rather than legislate. The Government therefore has support to produce guidance rather than legislate for the continuation of low alcohol descriptors. There were some concerns that in the absence of legislation this will provide uncertainty, and there were some in the alcohol industry who favoured maintaining regulation and some that did not. Others commented that the existing legislation was also confusing to industry and the public.
- 3.10 To mitigate concerns of moving from a legislative framework to guidance the Government will keep the guidance under review and assess its impact after a 3-year period. If the guidance is not serving its intended purpose, the Government will consider reintroducing legislation, and retains the power under The Food Safety Act 1990 to make such regulations.

## Question 2: Descriptors above 1.2% ABV

**Question 2: Do you have any evidence to support the case for introducing new alcoholic drink descriptors above 1.2% ABV.**

**Yes or No?**

**If Yes please provide the descriptor name(s), research and evidence to support and at what level of % ABV they relate to.**

### Background

- 3.11 The sunset clause in the Food Information Regulations 2014 allowed for a period for the Department of Health and Social Care to engage with stakeholders to discuss any proposals to introduce new descriptors for drinks with more than 1.2% ABV, with the aim of encouraging more people to consume drinks with a lower strength than the industry standard.
- 3.12 The Department hosted events with alcohol industry representatives and public health officials during the autumn of 2016 to discuss proposals. The focus was on proposals for beers, lagers, ciders and wines. Descriptors such as “reduced” or “lower alcohol” were proposed, but there was no consensus over the % ABV level at which these descriptors should apply.
- 3.13 In addition to these events, the Department of Health and Social Care commissioned independent research on the public understanding of, and response to, the existing descriptors, and potential new ones.
- 3.14 While the research conducted to date did not provide definitive support for new descriptors, the Department is committed to the principle of increasing consumer choice, encouraging lower alcohol consumption and ensuring simplicity of information provided. Therefore, the Department was keen to hear further views about how an additional descriptor or descriptors above 1.2% ABV could deliver this.

**Table 6: Summary of all responses received to Question 2**

Response to Q2	Individuals		Organisations		Not Answered		Overall	
	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage
Yes	1	1%	3	8%	0	0%	4	3%
No	91	99%	36	92%	2	100%	129	97%
Total	92	100%	39	100%	2	100%	133	100%

3.15 Table 6 above shows that 97% of all respondents did not have any evidence to support the case for introducing new alcoholic drink descriptors above 1.2% ABV. When responses were broken down, only 8% of organisations stated that they had evidence to support the case.

3.16 Those who stated they had evidence to support the case argued:

- Introducing new descriptors may reflect more accurately the current low alcohol beverage market.
- There is a strong logic in ensuring consistency across tax, labelling descriptors and marketing rules.
- Australia allows beers of up to 3.5% ABV to be described as “light” and this works well. The UK should therefore have a lower strength category set at 3.5% for the beer sector and call relevant products “light” or “mid strength” to encourage consumers to drink less.

3.17 Others commented as follows:

- Increasing the number of descriptors would be confusing for consumers, given the different strengths of alcohol set for different alcohol categories such as wine and beer.

- It is important that future guidance can be swiftly amended to respond to consumer demand and innovation.
- Introducing new descriptors above 1.2% ABV was likely to have a damaging financial impact on smaller brewers.

## **Department response**

- 3.18 The Department had commissioned research on the potential of new descriptors above 1.2% ABV to encourage people to move towards lower ABV% than the industry standard, but that research did not support such descriptors. The Department used the consultation to ask for more evidence. 8% of respondents from organisations claimed they had new evidence in support, but when reviewed this did not provide novel evidence.
- 3.19 No evidence was presented from Australia showing that the introduction of light beers has meant that this has led to a decrease in individual's alcohol consumption as a result. Some alcohol beers in the UK already use the light descriptor and some of these products are available above 3.5%. The Department proposes not to develop guidance concerning descriptors above 1.2% ABV. However, as part of the guidance commitment it will keep this policy under review if the evidence base changes.

## Question 3: The low alcohol descriptor

**Question 3: For something to be 'low alcohol' the amount of alcohol needs to be 1.2% or less. Do you think the Government should keep this guideline?**

**Yes- I think the Government should keep 1.2% as the upper limit for low alcohol**

**No- I think the Government should make the limit lower than 1.2% for low alcohol**

**I don't know**

**Additional Comments**

### Background

3.20 Since 1996 there has been an understanding that low alcoholic products could be described as anything at or below 1.2% ABV. Many products on the shelves using the low alcohol descriptor tend to be in the range of 0.5% to 1.2% ABV. The Government welcomed views around this descriptor.

The following words, descriptor and conditions are set out in the FLR 1996 with regards to the description and use of the term "low alcohol".

**Words and Descriptor-** *The description "low alcohol" or any other word or description which implies that the drink being described is low in alcohol.*

**Conditions-** *Shall not be applied to any alcoholic drink unless—*

*the drink has an alcoholic strength by volume of not more than 1.2 per cent, and*

*an indication of its maximum alcoholic strength in required form 1,2 or 3.*

**Table 7: Summary of all responses received to Question 3**

Response to Q3	Individuals		Organisations		Not Answered		Overall	
	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage
Yes	60	65%	29	74%	1	50%	90	68%
No	22	24%	2	5%	0	0%	24	18%
I don't know	10	11%	8	21%	1	50%	19	14%
Total	92	100%	39	100%	2	100%	133	100%

3.21 Table 7 above shows that 68% of respondents think the Government should keep 1.2% as the upper limit for low alcohol. When responses were broken down, 74% of organisations agreed with this proposal, which is marginally higher than the 65% of individuals that agreed.

3.22 Those who wished to keep the existing limit argued that it:

- is clear and unambiguous.
- Is a recognised threshold at which alcohol duties come into force.
- provides consistency with EU labelling legislation.
- The view was also expressed that “low alcohol” should not be applied to products of 0.5% ABV or less.

3.23 Those who disagreed with the proposals said:

- Low alcohol should be 0.5% abv and below.
- The current limit is artificial and relates only to the HMRC limit relating to tax.

## **Department response**

- 3.24 68% were in favour of keeping low alcohol at 1.2% ABV or less and this was made up of views shared by both industry and the public. The Department intends to keep the existing descriptor of low alcohol and to be defined as 1.2% ABV or less through guidance.

## Question 4: The Dealcoholised descriptor

**Question 4: Should the Government keep the existing descriptor dealcoholised? Yes or No?**

**If No, do you believe another descriptor could be used in its place and if so, what should this descriptor be called?**

### Background

The following words, descriptor and conditions are set out in the FLR 1996 regarding the description and use of the term “dealcoholised”.

Words and Descriptor- The description “dealcoholised”

Conditions- Shall not be applied to any drink, unless-

the drink, being an alcoholic drink from which the alcohol has been extracted, has an alcoholic strength by volume of not more than 0.5 per cent, and

the drink is marked or labelled with –

an indication of its maximum alcoholic strength in required form 1,2 or 3, or

ii) in an appropriate case, an indication that it contains no alcohol.

3.25 “Dealcoholised” is a term used when alcohol is produced through the fermentation process and then removed from the final drink so that it contains no more than 0.5% ABV. The descriptor tends to be used more by industry for wines rather than beers and lagers. From research the Department of Health and Social Care had received feedback from some industry representatives “dealcoholised” does not tend to resonate well with the public as a descriptor.

3.26 With the rise in the low alcohol industry and product appeal to consumers, the Government welcomed views as to whether this descriptor should continue, and if not, what alternatives might exist.



**Table 8: Summary of all responses received to Question 4**

Response to Q4	Individuals		Organisations		Not Answered		Overall	
Yes	55	60%	11	28%	2	100%	68	51%
No	37	40%	28	72%	0	0%	65	49%
Total	92	100%	39	100%	2	100%	133	100%

3.27 Table 8 above shows a close split overall, with 51% of respondents believing that the Government should keep the existing “dealcoholised” descriptor. When responses were broken down, 60% of individuals agreed with this proposal, more than double the 28% of respondents identifying as organisations who agreed.

3.28 Those who agreed said:

- If it was made clearer what dealcoholised means then it would be useful.
- The term should be retained, but for clarity the ABV of <0.5% should be included in the descriptor.

3.29 Those who disagreed with the proposals argued:

- “Dealcoholised” is not a term widely understood by the public.
- The term is best suited to describing a manufacturing process rather than as a descriptor.
- The term is inappropriate, inaccurate and unattractive for attracting customers away from regular beers to lower strength offerings.

## **Department response**

3.30 51% were in favour of keeping the “dealcoholised” descriptor. Many people did argue that the term “dealcoholised” does not resonate well with the public, with some accusing certain brewers of misusing the term on their products.

3.31 The descriptor is also not widely used on labelling. However, the results provided a slim majority in favour of keeping the descriptor. Through guidance the

Government can clarify for those who wish to use the descriptor how it should be used. If the Government does not protect this term through guidance there is a risk industry will misuse it and make their own assumptions about what “dealcoholised” is, and add further confusion. The Department therefore proposes to keep the existing “dealcoholised” descriptor through guidance.

## Question 5: The Non-alcoholic descriptor

**Question 5: Do you agree the term non-alcoholic should be permitted to be used otherwise than in connection with sacramental and communion wines?**

**Yes or No. If No, please provide a reason why.**

### Background

The following words, descriptor, conditions and regulations are set out in the FLR 1996 regarding the description and use of the term “non-alcoholic”.

**Words and Descriptor-**The description “non-alcoholic”.

**Conditions-** Shall not be used in conjunction with a name commonly associated with an alcoholic drink, except in the composite name “non-alcoholic wine” when that composite name is used in accordance with regulation 43.

#### **Regulation 43 The word “wine”**

Subject to the following provisions of this regulation, the word “wine” may be used in a composite name in the labelling or advertising of food for a drink which is not wine within the meaning given in point 1 of Part II of Annex VII to Regulation (EU) 1308/2013.

The word “wine” shall not be used pursuant to paragraph (1) of this regulation as part of a composite name which is likely to cause confusion with wine or table wine within the meaning given in point 1 of Part II of Annex VII to Regulation (EU) 1308/2013.

Each word that forms part of a composite name used pursuant to paragraph (1) of this regulation must appear in lettering of the same type and colour and of such a height that the composite name is clearly distinguishable from other.

The composite name “non-alcoholic wine” shall not be used pursuant to paragraph (1) of this regulation, except for a drink derived from unfermented grape juice which is intended exclusively for communion or sacramental use and which is described clearly in its labelling or advertising as being exclusively for such use.

When the word “wine” is used in a composite name for a drink which is derived from fruit other than grapes, that drink shall be obtained by an alcoholic fermentation of that fruit.

3.32 There are a variety of alcohol free or low alcohol drinks made from grapes on the market. It may be the case that the current conditions for the use of the descriptor

“non-alcoholic” are too restrictive and fail to reflect the innovation in the marketplace, which has resulted in more alcohol-free products made with grapes, along with a range of other drinks such as alcohol-free beers. There are possible overlaps and confusion with this descriptor and the term “alcohol free” which is described in the next section. The Government welcomed views on this descriptor.

**Table 9: Summary of all responses received to Question 5**

Response to Q5	Individuals		Organisations		Not Answered		Overall	
	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage
Yes	79	86%	31	79%	1	50%	111	83%
No	13	14%	8	21%	1	50%	22	17%
Total	92	100%	39	100%	2	100%	133	100%

3.33 Table 9 above shows that 83% of respondents agree that the term non-alcoholic should be permitted to be used, other than in connection with sacramental and communion wines. When responses were broken down, 79% of organisations agreed with this proposal, a marginally lower figure than the 86% of individuals that agreed.

3.34 Those who agreed that the term should be applied more widely argued that:

- “Non-alcoholic” should be applicable and used to all products below 0.5% as long as the ABV is clear on the label and associated marketing.
- Other countries use equivalent terms to “non-alcoholic” (such as “alkoholfrei”) and use these terms to refer to products of up to 0.5% ABV.
- It would be helpful to have both the “non-alcoholic” and “alcohol free” descriptors should be available and set at 0.5% abv.

3.35 Those who disagreed with the proposals said:

- Having “non-alcoholic” as a descriptor only serves to cause confusion.

- “Non-alcoholic” should only be used in products containing no alcohol.
- The restriction of its use is positive, to broaden its use could create unwanted overlaps.

## Department response

- 3.36 83% were in favour of using the term “non-alcoholic” more widely, with many respondents arguing that this descriptor should be used for drinks at 0.5% ABV or less, as is common in the US and with some European countries, (although these products tend to be defined as “alcohol free”). There are also certain EU regulations which protect using the non-alcoholic term with general wines and spirits, so its use would be restricted to certain drinks. Some respondents expressed concerns that defining any drink with alcohol with 0.5% ABV or less in it as non-alcoholic could mislead pregnant women into drinking alcohol, affect people’s judgement, inadvertently encourage drink driving and send the wrong message to people in alcohol recovery.
- 3.37 The responses to Question 6 also showed support to keep the “alcohol free” descriptor at its current level of 0.05% abv. Therefore, any change to the “non-alcoholic” descriptor could contradict that.
- 3.38 The Department is not convinced that the case has been made to change the application of “non-alcoholic” and will therefore maintain through guidance the non-alcoholic descriptor as it currently stands, although this would keep this under review as part of the guidance commitment.

## Question 6: The Alcohol free descriptor

**Question 6: Do you agree that Government should maintain the descriptor alcohol free, and for this to continue at 0.05% ABV? Yes or No.**

**If No, please provide a reason why and alternative suggestions.**

### Background

The following words, descriptor and conditions are set out in the FLR 1996 with regards to the description and use of the term “alcohol-free”.

**Words and Descriptor-** The description “alcohol-free”.

**Conditions-** Shall not be applied to any alcoholic drink from which the alcohol has been extracted, unless—

the drink has an alcoholic strength by volume of not more than 0.05 per cent, and

the drink is marked or labelled with--

an indication of its maximum alcoholic strength in a form comprising of the words “not more than” followed by a figure to not more than one decimal place indicating its maximum alcoholic strength and the symbol “% vol.” (required form 1), “alcohol % vol.” (required form 2), or “alc. % vol.” (required form 3), or in an appropriate case, an indication that it contains no alcohol.

- 3.39 Different countries define “non-alcoholic” or “alcohol-free” differently. For example, in Sweden alcohol free is classed as no more than 0.5% ABV, however in Italy non-alcoholic beer is defined as being equal to or less than 1.2% ABV.
- 3.40 Under section 191(1)(a) of the Licensing Act 2003, the definition of alcohol does not include alcohol which is of a strength not exceeding 0.5% at the time of the sale or supply in question. This could be seen as contradictory to advice given that a descriptor for alcohol free is set at 0.05% ABV.
- 3.41 One option would be to redefine “alcohol-free” as below 0.5% ABV to encourage the alcohol industry to produce more low alcohol products. However, the low alcohol industry is growing and sales of 0.05% ABV products are increasing in the UK. The Industry has demonstrated that it can produce quality products which meet the current definition of “alcohol free” of 0.05% or less.

3.42 It is important that consumers are aware of the content of the products they are consuming and that descriptors meet public expectations. The Government was mindful that permitting products of up to 0.5% to be described as “alcohol free” may have negative consequences for some consumers. For example, there are some religions where drinking of alcohol is forbidden, pregnant women need to know if the products they are using are safe to consume and not harmful, recovering alcoholics may need to avoid alcohol where it could become a gateway to drinking dependency, and drivers need a clear understanding that what they are drinking provides a safe limit. For these reasons the Government was not minded to change the definition of “alcohol-free”. The Government welcomed views on this descriptor.

**Table 10: Summary of all responses received to Question 6**

Response to Q6	Individuals		Organisations		Not Answered		Overall	
	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage	Number of respondents	Percentage
Yes	58	63%	19	49%	1	50%	78	59%
No	34	37%	20	51%	1	50%	55	41%
Total	92	100%	39	100%	2	100%	133	100%

3.43 Table 10 above shows that 59% of respondents agreed that the Government should maintain the descriptor “alcohol free” and for this to continue at 0.05% ABV. When responses were broken down, organisations were almost equally split, with 49% agreeing with the proposal, and 51% against. A clear majority of individuals (63%) supported the Government’s approach.

3.44 Those who agreed said:

- This approach makes it easier for people who are trying to moderate or cut down their alcohol intake.
- From the UK consumer perspective, it is counter-intuitive to raise the ABV of the “alcohol free” descriptor when 0.05% ABV products or less are widely available on the UK market.

3.45 Those who disagreed argued that:

- “Alcohol free” should be restricted to products which contain no alcohol whatsoever.
- All beers under 0.5% should be classed as “alcohol free”.
- The level of 0.05% is not low enough and should be zero.
- “Alcohol free” is set in some countries at 0.5% ABV.
- Some soft drinks and orange juice naturally ferment and produce alcohol and they are not covered by these descriptors.
- The 0.05% limit is anti-competitive and not in the interest of the consumer.
- A 0.5% limit on the alcohol-free descriptor would allow industry to make better products and more innovative flavours.

## **Department response**

- 3.46 59% were in favour of maintaining this descriptor and for it to continue to apply to products at 0.05% ABV. This included both industry and public respondents. As with the descriptor for “non-alcoholic”, some argued that producers should be able to use both terms for products of up to 0.5% ABV. Some in industry and private organisations state that there was a commercial disadvantage to UK brewers having to restrict the use of the descriptor “alcohol free” to products at 0.05% or less, when in some EU countries and the US the level is set at 0.5% abv, and mutual recognition laws meant that the stronger EU products can be marketed as “alcohol free”. However, this reflects the fact that there are no EU regulations on the application of “alcohol free”, which is left to Member States to decide.
- 3.47 The Government proposes to maintain the descriptor “alcohol free” at 0.05% ABV through guidance. The Government will keep this area under review.



## Question 7: Any further comments

### Question 7: Do you have any further comments?

- 3.48 There were 64 responses to this question. There were an equal number of responses from both individuals and organisations.
- 3.49 Responses from organisations included the following:
- It would be better to focus on fewer descriptors to provide clarity for consumers
  - There is a lack of information around what the public understand by these various descriptors, and what impact on drinking behaviour any changes to them would have. Moving forward, we would expect the government to gather further evidence around the public understanding of these descriptors and what the impacts are of any changes.
  - The government should use this opportunity to ensure that standardised nutritional and calorie information is provided directly on the label of all beverages containing alcohol, as well as those which are non-alcoholic. This would further support consumers to make informed decisions regarding their consumption of drinks containing alcohol, as well as their broader health and diet.
  - “This is a time for clarity. Our daily experiences with the public at large and with specialist groups affected by foetal alcohol spectrum disorders (FASD) suggest no-one truly understands the labelling description of products (if they see it and are not served by the glass), unit measures, risks in pregnancy, thresholds of harm etc. It is not just how the industry interprets the terminology but how the public at large would understand the terminology”.
- 3.50 Some of the responses from individuals included the following:
- Labelling needs to be consistent, clear and informative.
  - It is essential that people are informed about how much alcohol they are consuming.
  - Consider a minimum cost per unit.
  - Across all alcoholic drink sectors there is a need for clarity on terminology and descriptors to enable consumers to clearly understand the products they are choosing and how they fit within the new and emerging landscape of drinking occasions.

## 4. Conclusion

- 4.1 The Government is grateful to all those who took the time to respond to this consultation, and for the wide-ranging comments that were provided.
- 4.2 The responses to the consultation support the Government's approach of the use of descriptors through guidance rather than legislation. The Government's preference is to maintain the existing descriptors, but this guidance will be kept under review. The Government expects industry to comply with that guidance.
- 4.3 There is limited evidence to suggest providing descriptors above 1.2% ABV would be beneficial to public health. However, the Government will keep this under review. The use of guidance rather than legislation will enable changes to be made quickly, should the evidence base change.

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