

Open consultation

# Updating labelling guidance for no and low-alcohol alternatives: consultation

Published 28 September 2023

**Applies to England**

## Contents

[Introduction](#)

[NoLo alcohol drinks](#)

[Summary of policy aims](#)

[Our approach](#)

[Our consultation](#)

[Low alcohol descriptors](#)

[Communicating the UK  
chief medical officers' low  
risk drinking guidelines](#)

[Age restriction warnings](#)

[Consultation questions](#)

[How to respond](#)

[Next steps](#)

[Campaign responses](#)

[Privacy notice](#)

[References](#)



© Crown copyright 2023

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3) or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gov.uk](mailto:psi@nationalarchives.gov.uk).

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/consultations/updating-labelling-guidance-for-no-and-low-alcohol-alternatives/consultation>

# Introduction

## Overview

One in five adults in England drink above the UK chief medical officers' (CMOs') low risk guidelines of 14 units per week, significantly increasing their risk of ill-health, poorer quality of life and premature death. Alcohol misuse also has social and economic impacts, including costs associated with crime, harm to the family and others, healthcare pressures and lost productivity in the workplace.

Supporting drinkers to reduce their alcohol consumption can contribute to reducing alcohol-related harm, both to individual drinkers and to society.

Substituting a standard alcoholic drink for an 'alcohol free' or low-alcohol ('NoLo') alternative is one way that individuals can reduce their alcohol consumption.

The government wants to increase substitution of alcoholic drinks with NoLo alternatives among people who drink above low-risk levels. Research suggests that the main policies that encourage substitution of higher strength drinks with lower strength drinks relate to price, availability and clear labelling.

The government is consulting on options for updating recommendations on labelling of NoLo alcohol drinks, including seeking evidence on whether these options could facilitate industry to shift the alcohol market towards lower strength options by making them more available, acceptable and affordable as substitutes for standard alcoholic drinks.

## The harms caused by alcohol

Alcohol is the third leading risk factor for death and disability in the UK after smoking and obesity (PHE 2016).

At an individual level, regularly drinking alcohol increases the risk of developing a range of health problems (Bryazka and others 2022, Rao and Topiwala 2020). This includes:

- liver disease
- cardiovascular disease
- cancers of the mouth, throat and breast (Bryazka and others 2022)
- acute and chronic alcohol-related brain damage (Rao and Topiwala 2020)

Drinking large amounts of alcohol in a single day substantially increases the risk of short-term harms such as accidents and injuries.

The Office for National Statistics' report [Alcohol-specific deaths in the UK](https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/alcohol-specific-deaths-in-the-uk/2021-registrations) (<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/alcohol-specific-deaths-in-the-uk/2021-registrations>) found that in England in 2021, 7,556 people died from conditions wholly caused by alcohol, which is the highest number on record. Deaths specifically from alcohol have risen by 30% between 2019 and 2021. This rise has been linked to increased alcohol consumption among the heaviest drinkers, which the report [Alcohol consumption and harm during the COVID-19 pandemic](https://www.gov.uk/government/publications/alcohol-consumption-and-harm-during-the-covid-19-pandemic) (<https://www.gov.uk/government/publications/alcohol-consumption-and-harm-during-the-covid-19-pandemic>) found had particularly increased since the start of the pandemic. The NHS Digital report [Statistics on alcohol](https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-alcohol/2021/part-1) (<https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-alcohol/2021/part-1>) estimates there are approximately 900,000 hospital admissions each year that are related to alcohol. The social and economic impacts of alcohol misuse are substantial and wide ranging, including:

- costs associated with crime
- anti-social behaviour
- health and social care
- lost productivity in the workplace

The NHS advice [keeping well in pregnancy \(https://www.nhs.uk/pregnancy/keeping-well/drinking-alcohol-while-pregnant/\)](https://www.nhs.uk/pregnancy/keeping-well/drinking-alcohol-while-pregnant/) highlights that drinking alcohol in pregnancy can have a range of impacts on the unborn baby, including fetal alcohol spectrum disorder.

Children who start drinking are more likely to be heavy drinkers or have alcohol dependence in adulthood and underage drinking is associated with an array of negative outcomes such as school truancy, exclusion and violent offending (Liang and Chikritzhs 2013, Healey and others 2014).

Alcohol harms are estimated to cost the UK at least £25 billion each year, as outlined in HM Treasury's [Treasury Minutes - July 2023 \(https://www.gov.uk/government/publications/treasury-minutes-july-2023\)](https://www.gov.uk/government/publications/treasury-minutes-july-2023).

To keep health risks from alcohol consumption to a minimum, the [UK CMOs' low risk drinking guidelines \(https://www.gov.uk/government/publications/alcohol-consumption-advice-on-low-risk-drinking\)](https://www.gov.uk/government/publications/alcohol-consumption-advice-on-low-risk-drinking) recommend:

- not to drink more than 14 units of alcohol a week on a regular basis (equivalent to roughly 6 pints of average-strength (4% alcohol by volume (ABV)) beer or 6 medium (175ml) glasses of standard-strength (13% ABV) wine)
- to spread your drinking over 3 or more days if you regularly drink as much as 14 units a week
- to limit the amount of alcohol you drink on any single occasion
- not to drink alcohol at all if you are pregnant or think you could become pregnant to keep risks to your baby to a minimum

## Alcohol consumption in England

The [Health Survey for England 2021 \(https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2021/part-3-drinking-alcohol\)](https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2021/part-3-drinking-alcohol) found that 1 in 5 adults (about 10 million people) drink above the UK CMOs' recommended weekly limit of 14 units, significantly increasing their risk of harm. Of these adults, 1.7 million are drinking at levels already likely to be negatively affecting their health, which is 35 units a week or more for women and 50 units a week or more for men. This group represents 4% of the English adult population and consumes 30% of all alcohol sold (Bhattacharya and others 2018).

Table 1: alcohol consumption in England and Wales

Group	Non-drinkers	Low risk drinkers (14 units a week or less)	Increasing risk drinkers (15 to 34 units a week for women and 15 to 49 units a week for men)	Higher risk drinkers (35+ units a week for women and 50+ units a week for men)
Number of adults (% adult population)	9.9 million (21%)	26.3 million (57%)	8.2 million (18%)	1.7 million (4%), including 0.6 million dependent (1.4%)

Source: Health Survey for England 2021

## Swapping alcohol for 'alcohol free' or low alcohol products

Swapping a standard alcoholic drink for a NoLo product is one of many ways individuals can reduce their alcohol consumption. Common individual strategies for reducing alcohol consumption include drinking fewer alcoholic drinks, drinking smaller drinks, drinking on fewer occasions or a combination of the 3 (Sasso and others 2022). NoLo consumption can make up part of these strategies.

The World Health Organization's (WHO) [Political declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases \(PDF, 445KB\)](https://apps.who.int/gb/ebwha/pdf_files/EB150/B150_7Add1-en.pdf) ([https://apps.who.int/gb/ebwha/pdf\\_files/EB150/B150\\_7Add1-en.pdf](https://apps.who.int/gb/ebwha/pdf_files/EB150/B150_7Add1-en.pdf)) calls on alcohol producers and retailers to “substitute, whenever possible, higher-alcohol products with no-alcohol and lower-alcohol products in their overall product portfolios, with the goal of decreasing the overall levels of alcohol consumption in populations and consumers”.

In [Advancing our health: prevention in the 2020s](https://www.gov.uk/government/consultations/advancing-our-health-prevention-in-the-2020s/advancing-our-health-prevention-in-the-2020s-consultation-document) (<https://www.gov.uk/government/consultations/advancing-our-health-prevention-in-the-2020s/advancing-our-health-prevention-in-the-2020s-consultation-document>), the Department of Health and Social Care (DHSC) committed to help shift the general drinking population's consumption of alcohol to NoLo alternatives. This included a commitment to support industry to deliver a significant increase in the availability of these products by 2025, both in retail (off-trade) and in the out of home sector such as pubs, bars and restaurants (on-trade).

## NoLo alcohol drinks

'Alcohol free' products are currently defined in England as products with an ABV content not exceeding 0.05%. Low alcohol products are defined as products with an ABV content not exceeding 1.2%. These drinks are designed to replicate the taste and experience of standard-strength alcoholic drinks and cover a wide range of products, including NoLo beers, spirits, ciders and wine-based drinks.

The NoLo drinks market has increased rapidly in recent years, predominantly driven by alcohol free beer, which [trade publication The Morning Advertiser identified as one of the fastest-growing drinks trends in the UK](https://www.morningadvertiser.co.uk/Article/2019/05/20/How-much-has-the-no-alcohol-category-grown) (<https://www.morningadvertiser.co.uk/Article/2019/05/20/How-much-has-the-no-alcohol-category-grown>). For analysis of NoLo market of the UK, please see [Potential health impacts of changing the alcohol free descriptor: evidence review](https://www.gov.uk/government/consultations/updating-labelling-guidance-for-no-and-low-alcohol-alternatives) (<https://www.gov.uk/government/consultations/updating-labelling-guidance-for-no-and-low-alcohol-alternatives>).

## Potential role in harm reduction

At the individual level, NoLo products have the potential to reduce health harms through decreasing levels of alcohol consumption. There are different mechanisms of achieving this. Current drinkers may replace standard alcoholic drinks with similar drinks of lower strength, or switch to alcohol free alternatives some of the time, so reducing the average amount of alcohol they consume (Rehm and others 2016). Alcohol free drinks may also provide an alternative for individuals looking to avoid alcohol in risky situations, for example before driving.

Substituting alcoholic drinks for NoLo alternatives is an increasingly popular strategy for individuals looking to reduce their alcohol consumption. The 2020 Social Market Foundation report [Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms](https://www.smf.co.uk/publications/no-low-alcohol-harms/) (<https://www.smf.co.uk/publications/no-low-alcohol-harms/>) found that 27% of UK adults surveyed had consumed a NoLo drink in the past 12 months, of which 41% reported that drinking NoLo drinks had led them to reduce their alcohol intake or to stop drinking alcohol completely, against 44% saying their alcohol consumption was unchanged, and 6% reporting increased alcohol consumption. More recently, Alcohol Change UK published [Do alcohol-free drinks help heavy drinkers cut their drinking?](https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking/) (<https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking/>), a report of a survey of UK adults drinking at risky levels. The report found that alcohol free drinks were important for most harmful and hazardous drinkers trying to reduce their consumption in the sample, with 53% stating that these drinks were 'essential' or 'very important' to their attempts to cut back. The vast majority of the sample (98.5%) were people who were trying or had cut back their alcohol consumption.

NoLo alcohol alternatives are still a small and emerging market, and there is currently little research that assesses the impact of NoLo drinks on alcohol consumption and health outcomes. The same Alcohol Change UK report also found that the use of

alcohol free drinks was associated with success in moving from higher to lower drinking categories for the majority of the sample.

A 2023 study that analysed changes in shops and supermarket purchasing data found that the introduction of new 'no-alcohol' beers and wine-based drinks (defined by the study as not containing more than 0.5% ABV) in Great Britain (2015 to 2020) and Spain (first quarter of 2017 to the end of the first quarter of 2022) had led to some substitutions of higher strength products (Rehm and others 2023). However, the study concluded that the uptake of NoLo products by the general population has not been large enough to produce a marked public health impact.

## **Potential unintended consequences of increased availability, marketing and consumption of NoLo alcohol products**

Research has highlighted that the consumption and marketing of NoLo drinks may have some potential negative impacts on harm reduction for the general population and specific groups.

[Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms \(https://www.smf.co.uk/publications/no-low-alcohol-harms/\)](https://www.smf.co.uk/publications/no-low-alcohol-harms/) found that, while all segments of the UK population buy and consume NoLo drinks:

- men are more likely to drink NoLo products than women
- people on higher incomes are more likely to drink NoLo products than those on lower incomes
- younger adults (18 to 34 years) are more likely to drink NoLo products than older adults (35 to 54 years and 55 years and above)

Because alcohol consumption and health harms are generally lower in younger age groups and people from higher socio-economic groups, there are concerns from public health stakeholders that an overall increase in consumption of NoLo products may not translate to a proportionate reduction in alcohol related health harms across the whole population.

Consumption of NoLo drinks by people with alcohol use disorders has been associated with increased cravings and other physiological responses similar to those experienced when using alcohol, and so may present a relapse risk (Caballeria and others 2022).

Some stakeholders have raised concerns that availability of NoLo drinks to children and young people may act as a gateway to consuming standard-strength alcoholic drinks, and that exposure to NoLo drinks marketing might indirectly promote alcohol consumption. Exposure to brand-specific advertising has been found to increase consumption of the brand that was advertised among adolescents (Weitzman and Lee 2020). An Alcohol Change [briefing paper on brand recognition \(https://alcoholchange.org.uk/publication/making-an-impression-recognition-of-alcohol-brands-by-primary-school-children\)](https://alcoholchange.org.uk/publication/making-an-impression-recognition-of-alcohol-brands-by-primary-school-children) found children as young as 10 years old have been found to easily identify alcohol company brands, logos and characters. An Institute of Alcohol Studies [report on adolescent attitudes to alcohol \(https://alcoholchange.org.uk/publication/internet-influences-on-adolescent-attitudes-to-alcohol\)](https://alcoholchange.org.uk/publication/internet-influences-on-adolescent-attitudes-to-alcohol) found children can struggle to tell the difference between a NoLo drink and a standard alcoholic drink.

Some public health stakeholders are also concerned that NoLo products might indirectly normalise alcohol use in contexts where alcohol is typically not consumed (such as at work, at the gym, in the morning) or to groups who should avoid alcohol (such as pregnant women). Views on drinking during pregnancy (especially low-level drinking) and understanding of risk of harm to the fetus varies (Ujhelyi Gomez and others 2022). Research has highlighted the importance of consistent messaging that there is no safe level of alcohol exposure during pregnancy, in line with the UK CMOs' low risk drinking guidelines (Popova and others 2022).

We have published an evidence review alongside this consultation document that examines the available evidence on some of these issues in more detail.

# Summary of policy aims

Supporting drinkers to reduce their alcohol consumption can contribute to reducing alcohol-related harm, both to individual drinkers and to society. Government action can be vital in shaping the environment to support people to make choices that help them live more healthily.

The government's policy aim is to reduce alcohol consumption and associated harm among people who regularly drink above the UK chief medical officers' guideline of 14 units per week. This aim is underpinned by the following objectives.

Objective 1: to increase substitution of alcoholic drinks with NoLo alcohol alternatives among people who drink above low risk levels.

We will know that we have succeeded in achieving this objective through seeing a change in the proportion of:

- drinkers self-reporting using NoLo drinks to reduce their alcohol consumption
- households reporting shifting their purchasing from alcoholic drinks to NoLo drinks in shops and supermarkets
- individuals reporting shifting their purchasing from alcoholic drinks to NoLo drinks in pubs, bars and restaurants

Objective 2: to facilitate a shift in the market from sales and promotion of alcoholic drinks towards NoLo alcohol alternatives.

We will know that we have succeeded in achieving this objective through seeing an increase in:

- total NoLo sales as a proportion of overall alcohol sales
- the proportion of licensed premises with a NoLo offering
- the proportion of pubs and bars offering a NoLo beer or cider on draught

We will be seeking views through this consultation on the best ways of monitoring whether these objectives are being achieved.

## Our approach

Research suggests that the main policies that favour substitution of higher strength alcohol products with lower strength products relate to price, availability and improved labelling (Anderson and others 2022). Advertising and marketing policies are also considered important in influencing the extent to which NoLo drinks are consumed as substitutes to standard alcoholic drinks.

### Improved labelling

A WHO [briefing on health warning labels on alcoholic beverages](https://www.who.int/publications/i/item/9789240044449) (<https://www.who.int/publications/i/item/9789240044449>) recommends labelling alcoholic drinks to increase awareness and ensure consumers make informed decisions.

Experimental studies suggest that including percentage ABV on the label of low-alcohol beverages can lead to greater consumption of these products than verbal descriptors alone (such as 'super low') (Shemilt and others 2017, Vasiljevic and others 2021).

Through the government's plan to reform retained EU law related to wine, the Department for Environment, Food and Rural Affairs (Defra) recently ran the consultation [Wine: reforms to retained EU law](https://www.gov.uk/government/consultations/wine-reforms-to-retained-eu-law) (<https://www.gov.uk/government/consultations/wine-reforms-to-retained-eu-law>) on proposed changes to amend the definition of wine to permit wine to be produced and marketed to a minimum of 0% ABV. Currently, under retained EU Regulation 1308/2013, products that are similar to wine cannot be described as wine if their alcohol content is below 8.5% or 4.5% ABV, depending on their designation. Instead they must use

terms such as 'wine-based drink'. Defra-commissioned [qualitative research on NoLo alcohol labelling \(https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229\)](https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229) found some consumers interpret 'wine-based drink' as implying an alcoholic wine has been mixed with other ingredients. So, this change may help consumer understanding of the product and their confidence in buying NoLo wine substitutes.

## Price

Like with standard alcohol, NoLo drinks are highly price responsive and cheaper costs are associated with higher volume of purchase (Llopis and others 2021), particularly when products are on price promotion. The Alcohol Change UK report [Do alcohol-free drinks help heavy drinkers cut their drinking? \(https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking\)](https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking) suggested that some people see the price of alcohol free drinks as a barrier to consumption, especially their perceived high price in the on-trade (bars, pubs and restaurants).

Looking at the mean price of NoLo products in the on-trade in 2021, the price of NoLo cider and spirits per litre sold was similar to their alcohol counterparts, NoLo 'wine-based drinks' were cheaper than wine, and NoLo beer was more expensive than standard beer (University of Sheffield analysis). NoLo products have been found to be less likely to be on price promotion than higher strength products in shops and supermarkets (including online) in Great Britain (Llopis and others 2021).

Drinks at 1.2% ABV and below are not subject to alcohol duty, so there is an existing financial incentive for producers to invest in NoLo products relative to standard-strength alcoholic products. The Chancellor has introduced reforms to alcohol duty structures from 1 August 2023 which, for the first time, taxes all alcohol products (above 1.2% ABV) in proportion to their alcohol content. This should create a financial incentive in favour of lower strength drinks.

Several producers of NoLo products have advised DHSC that NoLo drinks are often more expensive to manufacture than their alcoholic equivalents. Additional costs include those associated with:

- innovation
- capital investments in machinery for alcohol extraction
- higher quality ingredients to mimic the taste and sensation of alcohol

Alcohol is a natural preservative, so alcohol free options also undergo more treatment to make sure they are free of contaminants. There is also an economy of scale, with NoLo products still a minority drink compared to standard alcohol.

We are engaging with the alcohol industry to understand whether the potential changes to labelling guidance we are consulting on could support innovation in the NoLo market and possibly reduce production costs. This would allow for lower retail prices for NoLo beverages in both the on-trade and off-trade. We are seeking further evidence from producers on how the potential changes, if implemented, are likely to impact on their ability to innovate through this consultation.

## Availability

Experimental studies suggest that by increasing both the overall availability of NoLo products and the proportion of NoLo products versus standard-strength alcohol drinks, people are more likely to choose NoLo products over higher strength alternatives (Blackwell and others 2020, Clarke and others 2023). As outlined earlier, the addition of new 'no-alcohol' beer and wine products in Great Britain and Spain was associated with increased purchase of these products, largely in substitute of standard alcohol (Rehm and others 2023).

While the NoLo market has increased significantly in recent years, NoLo sales only made up 1.1% of the total alcohol volume sold in 2021, and only 2% of pubs and bars offered a NoLo beer on draught (University of Sheffield analysis). The report [Do alcohol-free drinks help heavy drinkers cut their drinking? \(https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-](https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking)



[drinking](#)) found that most people believed that online retailers and supermarkets had good availability of NoLo drinks. However, availability was considered average or poor in pubs and bars, off-licences, restaurants, corner shops and nightclubs.

We are seeking views from the alcohol industry on whether the potential changes to labelling we are consulting on could support them in increasing the availability of NoLo products relative to their standard-strength alcohol offer, and if so, how.

## Marketing

Promotion and marketing of NoLo products could increase consumer awareness and knowledge of NoLo drinks and the range of products available. The way NoLo products are marketed may also influence the extent to which they are consumed as substitutes to standard alcoholic drinks.

Lower strength alcohol products have tended to be marketed as complements to, rather than substitutes of, existing alcohol consumption (Anderson and others 2022). The impact of this marketing has not been evaluated. Some public health stakeholders have suggested that such marketing may lead to increased alcohol consumption. This could include normalising consumption of alcohol-like products in contexts where drinking alcohol would not be considered socially acceptable or safe. Or encouraging consumption by groups who should avoid alcohol (such as children or pregnant women).

The government works with regulators and the alcohol industry to address concerns over irresponsible marketing or advertising.

## UK Advertising Codes

The Advertising Standards Authority (ASA) is responsible for writing and enforcing standards for advertisers in the UK through the [UK Code of Broadcast Advertising](https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html) (<https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html>) and the [UK Code of Non-broadcast Advertising and Direct and Promotional Marketing](https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html) (<https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>) (together the [UK Advertising Codes](https://www.asa.org.uk/codes-and-rulings/advertising-codes.html) (<https://www.asa.org.uk/codes-and-rulings/advertising-codes.html>)). This system operates independently of government. These advertising codes include [detailed rules for the responsible advertising of alcoholic drinks](https://www.asa.org.uk/type/non_broadcast/code_section/18.html) ([https://www.asa.org.uk/type/non\\_broadcast/code\\_section/18.html](https://www.asa.org.uk/type/non_broadcast/code_section/18.html)) in traditional forms of media, including radio, TV and cinema, online and sports promotion.

The ASA has taken 2 recent steps to respond to the evolving NoLo market.

1. Following a public [consultation on advertising low-alcohol products](https://www.asa.org.uk/resource/consultation-amending-limitations-on-advertising-low-alcohol-products.html) (<https://www.asa.org.uk/resource/consultation-amending-limitations-on-advertising-low-alcohol-products.html>), in January 2022, the ASA removed a restriction which prohibited ads from suggesting that a low alcohol product's lower alcohol content was preferable if that ad also featured a standard alcoholic drink. Removal of this restriction has given advertisers more freedom to promote low strength drinks in a way that encourages consumers to choose them over standard alcoholic drinks.
2. The ASA ran a [consultation on advertising alcohol alternatives](https://www.asa.org.uk/resource/asa-consultation-on-advertising-alcohol-alternatives.html) (<https://www.asa.org.uk/resource/asa-consultation-on-advertising-alcohol-alternatives.html>). It consulted on new rules and guidance to regulate the advertising of 'alcohol alternative' products at 0.5% ABV and below, as the alcohol rules in the UK advertising codes apply to products with an alcoholic strength above 0.5% ABV only. This consultation ran from 10 February 2022 to 5 May 2022 and the ASA is considering responses.

## Naming, packaging and promotion rules for alcohol producers

Aspects of alcohol promotion that are not subject to regulation by the ASA or Ofcom are managed via a system of industry self-regulation. The Portman Group authors and enforces its own codes of practice. This includes the [Code of Practice on Naming, Packaging and Promotion of Alcoholic Drinks](https://www.portmangroup.org.uk/codes-of-practice/) and the [Code of Practice on Alcohol Sponsorship](https://www.portmangroup.org.uk/codes-of-practice/) (<https://www.portmangroup.org.uk/codes-of-practice/>). The codes apply to promotional activity by UK alcohol producers, such as:

- paid-for advertorials in newspapers or magazines

- branded merchandise
- packaging
- point-of-sale marketing (such as shelf signage, banners and display material near the checkout)
- press releases
- free sampling in public places
- sponsorship at sporting events

For the purpose of the codes, the Portman Group defines alcohol products as those above 0.5% ABV and intends to publish separate guidance on the naming, packaging and promotion of drinks up to 0.5% ABV later in 2023.

### **Wine and spirit labelling regulations**

Wine and spirits regulations, including [regulations originating from the EU](https://www.legislation.gov.uk/eur/2013/1308/annex/VII) (<https://www.legislation.gov.uk/eur/2013/1308/annex/VII>), and associated labelling guidance, such as Defra guidance [Labelling spirit drinks](https://www.gov.uk/guidance/labelling-spirit-drinks) (<https://www.gov.uk/guidance/labelling-spirit-drinks>), also contain rules relevant to NoLo labelling and naming.

Generally, wine shall have an actual alcoholic strength of no less than 8.5 % ABV, or 4.5% ABV for wines that have a Protected Designation of Origin (PDO) or Protected Geographical Indication (PGI) (for more information, see the Defra guidance [Protected geographical food and drink names](https://www.gov.uk/guidance/protected-geographical-food-and-drink-names) (<https://www.gov.uk/guidance/protected-geographical-food-and-drink-names>)). Wines that have had alcohol removed cannot be sold as wine. Instead, terms like ‘wine-based drink’ or similar must be used to differentiate them from wine sector products. Such products must be marketed in accordance with general food and drink labelling rules, for example, with a list of ingredients. Products cannot be labelled ‘low alcohol wine’ or ‘alcohol free wine’.

Spirit drinks are generally a minimum of 15% ABV (with some exceptions at 14% ABV). Specific categories of spirit drinks also have minimum strengths, for example gin (37.5% ABV) and whisky (40% ABV). Products cannot be labelled as an ‘alcohol free’ or ‘low alcohol’ beverage against a spirit drink name, for example ‘alcohol free rum’ or ‘low alcohol gin’. Spirit category names cannot be used in the description, presentation and labelling of these products, for example, ‘gin alternative’. This includes on websites and marketing descriptions.

## **Our consultation**

### **Consultation aim**

The aim of this consultation is to gather views and evidence on options for updating the voluntary guidance on labelling of alcohol free and low-alcohol (NoLo) products. This includes evidence from the alcohol industry on how these changes, if introduced, will affect their ability to increase availability of NoLo products and promote them as substitutes to alcohol drinks.

This consultation forms part of the government’s smarter regulation programme of regulatory reform measures that began in May 2023 with the publication of [Smarter regulation to grow the economy](https://www.gov.uk/government/publications/smarter-regulation-to-grow-the-economy) (<https://www.gov.uk/government/publications/smarter-regulation-to-grow-the-economy>). Smarter regulation is about improving regulation and guidance for businesses across the board, ensuring it is as clear, proportionate and does not unnecessarily impose burdens on businesses which restrict innovation and growth. We will be considering the impacts on businesses of any proposed changes to guidance alongside our primary aim of delivering improvements to public health.

As set out in the previous section, work is already underway across government and industry on NoLo alcohol price, availability and marketing. We are seeking views and evidence on what more government and NoLo retailers and producers can do to increase substitution of alcoholic drinks with NoLo alternatives among people who drink above low risk levels.

## Products in scope

Only drinks with an alcoholic strength of 1.2% ABV or less and marketed as alcohol substitute drinks are in scope of this consultation. An alcohol substitute drink is defined in regulation 9 to [The Soft Drinks Industry Levy Regulations 2018](http://www.legislation.gov.uk/ukxi/2018/41/made) (<http://www.legislation.gov.uk/ukxi/2018/41/made>). The regulations state that for a drink to be classed as an 'alcohol substitute drink', it must be all of the following:

- in packaging comparable to, and marketed in a way that is comparable to, the particular kind of alcoholic beverage to which it is similar
- is not marketed in a way which is directed at, or is likely to appeal particularly to, people under 18 years of age
- when it is advertised or sold, it is advertised or sold as a direct replacement for the particular kind of alcoholic beverage to which it is similar

The regulations also state that the drink must also be one or more of the following:

- made from an alcoholic beverage by a process of de-alcoholisation by which the alcoholic strength of the beverage is reduced to 1.2% or lower
- manufactured using a fermentation or distillation process during which alcohol is produced but the alcoholic strength of the product of fermentation or distillation never exceeds 1.2%, and such product is not diluted or mixed with any other substance, unless, in the case of a product of distillation, that substance has dissolved into the product
- is manufactured by blending an alcoholic beverage of cider, beer, wine or made-wine with fruit juice, with or without the addition of water or other ingredients, to make a soft drink that is similar to the alcoholic beverage used in its production

## Territorial scope

Labelling of products up to 1.2% ABV is a devolved matter. This consultation applies to England-only guidance. As the low alcohol descriptor guidance is voluntary, it does not intersect with the principles of mutual recognition and non-discrimination under the [UK Internal Market Act 2020](https://www.legislation.gov.uk/ukpga/2020/27/contents). (<https://www.legislation.gov.uk/ukpga/2020/27/contents>) A product adhering to the low alcohol descriptor guidance in England can be sold with the same label in the rest of the UK.

Alcohol policy is devolved in the UK. With regard to the labelling of food and drink, including alcoholic products (1.2% ABV or above), the [Food compositional standards and labelling common framework](https://www.gov.uk/government/publications/food-compositional-standards-and-labelling-common-framework) (<https://www.gov.uk/government/publications/food-compositional-standards-and-labelling-common-framework>) is in place to enable the functioning of the UK Internal Market while acknowledging the potential for policy divergence.

The UK government will share relevant responses and the outcomes of this consultation with the devolved administrations to inform any review of the labelling of NoLo products, including the use of descriptors, as appropriate.

## Low alcohol descriptors

### Guidance on low alcohol descriptors

The government's expectations for how NoLo alcohol drinks may be described are set out in England-only [guidance on low-alcohol descriptors](https://www.gov.uk/government/publications/low-alcohol-descriptors) (<https://www.gov.uk/government/publications/low-alcohol-descriptors>) published by DHSC. Its purpose is to support the alcohol manufacturing and retail industries to market their products responsibly, with the aim of protecting the public and informing consumers. This guidance replaced the Food Labelling Regulations 1996 which expired on 13 December 2018.

The guidance only applies to a product marketed as an alcohol substitute drink and not soft beverages. As set out under 'Products in scope' in the 'Our consultation' section of this consultation document, an alcohol substitute drink is defined in regulation 9 to [The Soft Drinks Industry Levy Regulations 2018](https://www.legislation.gov.uk/uksi/2018/41/made) (<https://www.legislation.gov.uk/uksi/2018/41/made>).

Use of descriptors is voluntary, but if they are used, the guidance currently sets out the following recommended conditions for their use, as follows.

### **Alcohol free**

The term 'alcohol free' should only be applied to a drink from which the alcohol has been extracted if it contains no more than 0.05% ABV, and the products should also include the ABV (or state that they contain no alcohol) on the label in order to use the descriptor.

### **De-alcoholised**

The term 'de-alcoholised' should only be applied to a drink from which the alcohol has been extracted if it contains no more than 0.5% ABV and the product should also include an indication of its alcoholic strength (or state that it contains no alcohol).

### **Non-alcoholic**

The term 'non-alcoholic' should not be used in conjunction with a name commonly associated with an alcoholic drink. There is an exception for non-alcoholic wine where it is derived from unfermented grape juice and is intended exclusively for communion or sacramental use. The labelling or advertising of these non-alcoholic wines should make it clear that it is exclusively for such use.

### **Low alcohol**

A low alcohol drink must be 1.2% ABV or below and an indication of its maximum ABV should be included on the label.

DHSC committed to review this guidance on a regular basis. The NoLo market has developed significantly since the guidance was published in 2018 and it is important this guidance remains up-to-date. It has also been suggested by a wide range of stakeholders that DHSC's low-alcohol descriptors are confusing and poorly understood by the public.

## **The 'alcohol free' descriptor**

### **Definition of 'alcohol free'**

Current DHSC guidance, based on the Food Labelling Regulations 1996, recommends that the maximum alcoholic strength at which a drink should be described as 'alcohol free' is 0.05% ABV.

Under [section 191\(1\)\(a\) of the Licensing Act 2003](https://www.legislation.gov.uk/ukpga/2003/17/section/191) (<https://www.legislation.gov.uk/ukpga/2003/17/section/191>), 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 in low alcohol descriptors guidance.

### **International alcohol free descriptors**

Internationally, the terms used to describe products as containing no alcohol can vary, but the most common term used in Europe is 'alcohol free'. Most European countries that use a specific threshold, use a threshold of 0.5% ABV, with some countries applying a threshold as high as 1.2% ABV and 2.8% ABV (see table 2). As far as we are aware, England (and the rest of the UK) recommends one of the lowest thresholds of any country for describing a product as alcohol free.

Table 2: international strength thresholds for products described as containing no alcohol

<b>Country</b>	<b>ABV%</b>
<b>Finland</b>	≤ 2.8%
<b>Iceland</b>	≤ 2.25%
<b>France</b>	≤ 1.2%
<b>Italy</b>	≤ 1.2%
<b>Lithuania</b>	< 1.2% for all products, < 0.5% for beer
<b>Slovenia</b>	≤ 1.2%
<b>Japan</b>	≤ 1.0%
<b>Spain</b>	≤ 1.0%
<b>Norway</b>	≤ 0.7%
<b>Australia</b>	≤ 0.5%
<b>Austria</b>	≤ 0.5%
<b>Belgium</b>	≤ 0.5%
<b>China</b>	≤ 0.5%
<b>Croatia</b>	≤ 0.5%
<b>Cyprus</b>	≤ 0.5%
<b>Czech Republic</b>	≤ 0.5%
<b>Denmark</b>	≤ 0.5%
<b>Germany</b>	≤ 0.5%
<b>Hungary</b>	≤ 0.5%
<b>India</b>	≤ 0.5%
<b>New Zealand</b>	≤ 0.5%
<b>Nigeria</b>	≤ 0.5%
<b>Portugal</b>	≤ 0.5%
<b>South Africa</b>	≤ 0.5%
<b>Sweden</b>	≤ 0.5%
<b>Turkey</b>	≤ 0.5%
<b>USA</b>	≤ 0.5%
<b>Canada</b>	≤ 0.4%
<b>Netherlands</b>	≤ 0.1%
<b>UK</b>	≤ 0.05%

Source: Okaru and Lachenmeier 2022

### **Issues with the alcohol free descriptor**

Some members of the alcohol manufacturing and retail industries have argued that England's recommended alcohol free threshold is too restrictive. Parts of industry have said that the current threshold level puts English producers that comply with

England's guidance at a competitive disadvantage, compared with producers that do not. They argue this is particularly significant with international producers as they are more likely to label products according to the rules of their country of origin.

Any products sold in Great Britain must comply with the legislation that applies to that type of product in Great Britain. As conditions of use of low alcohol descriptors are not currently set out in legislation in Great Britain, they are not legally enforceable. This inconsistency also creates a potentially confusing environment for consumers who currently see similar products side-by-side on shelves described in different ways.

Some alcohol producers have also indicated that England's current alcohol free descriptor is a barrier to innovation and development of NoLo alternatives. The physical removal of alcohol to a strength no greater than 0.05% ABV is complex and requires significant investment in equipment. Larger producers have demonstrated that it is possible to produce quality products at 0.05% ABV or below, with a growing number of 0.0% ABV products on the market, and there is evidence of some smaller producers who are manufacturing products at 0.05% ABV or below. However, many smaller producers say that they lack the resource to manufacture products at this strength. A number of producers have indicated that increasing the alcohol free threshold to 0.5% ABV would provide them with more flexibility to use a greater variety of innovative approaches to the creation of these products, potentially leading to greater diversity and choice in the market.

Because alcohol (ethanol) suppresses bacterial growth, products with lower ABVs are at higher risk of microbial spoilage (becoming unsuitable to drink due to the growth of undesired microorganisms) (Suiker and Wösten 2022). Innovative techniques may also be required to prevent fermentation occurring in the casks, kegs or lines in on-trade settings, to prevent natural yeast from the lines making its way into the product, increasing its alcohol content. It has been suggested by the alcohol industry that the techniques for storing and dispensing products on draught are much more difficult and costly for 0.05% ABV products compared with 0.5% ABV products.

As part of this consultation, we welcome evidence from producers and retailers on how potential changes to the descriptors, if introduced, would facilitate increases in availability of NoLo products and thereby support substitution to help reduce alcohol harm.

### **Expectations of the alcohol free descriptor**

England's approach to labelling of food and drink is based on the principle that labelling must not be misleading, inaccurate or unclear. Defra-commissioned [qualitative research on NoLo alcohol labelling \(https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229\)](https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229) suggests that consumers generally expect the term alcohol free to mean completely devoid of alcohol, but there was considerable debate about what percentage ABV was "too high". The Alcohol Change UK report [Do alcohol-free drinks help heavy drinkers cut their drinking? \(https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking\)](https://alcoholchange.org.uk/publication/do-alcohol-free-drinks-help-heavy-drinkers-cut-their-drinking) also suggests that consumers tend to prefer alcohol free to mean the absence of alcohol. In this study sample, 85% thought that the term alcohol free should mean either no alcohol (45%) or 0.05% ABV ('trace') (40%). Fewer than 6% thought it should mean 0.5% ABV. So it could be argued that consumers who have expressed such preference may find labelling a 0.5% ABV drink as alcohol free misleading. This may present a particular risk for people who want to avoid alcohol completely, for example for health or religious reasons or in pregnancy.

### **Risks related to changing the alcohol free descriptor**

OHID undertook a rapid evidence review of scientific literature on the known risks to consumers of describing alcohol substitute drinks with 0.5% ABV as alcohol free, which has been published alongside this consultation.

The review found that applying the alcohol free descriptor to 0.5% ABV products is highly unlikely to have negative consequences for drink driving. This is because an individual would have to drink an improbably large quantity of 0.5% ABV drinks to reach a blood alcohol concentration level associated with intoxication and risk on the road. The review found evidence that NoLo alcohol drinks have been associated with increasing cravings to drink alcohol in those with alcohol use disorders, although no studies specifically differentiated the effects of drinks at 0.5% ABV. No research was identified which examined whether 0.5% ABV products are safe to consume during pregnancy.

We are seeking views on the inclusion of the UK CMOs' low risk drinking guidelines, including pregnancy warnings, on NoLo product labels as a possible mitigation for these risks in subsequent sections of this consultation.

### **Labelling options for feedback**

In view of recent developments within the UK market for NoLo drinks, we are seeking views on whether we should retain the current strength threshold of 0.05% at which a product can be described as alcohol free or, in line with UK licensing laws and labelling rules in other countries, change that threshold to 0.5%. We are mindful of the need to ensure consumers have the information they need to make informed choices and are also seeking views on clear and consistent ABV labelling and health warnings in later sections of this consultation.

The existing guidance suggests that the term alcohol free should be applied “to a drink from which the alcohol has been extracted”. NoLo producers have pointed out that this description no longer fully reflects the different production methods used for manufacturing of NoLo drinks. Producers can:

- physically remove alcohol from the finished product (de-alcoholisation)
- modify their brewing or distillation technique to restrict fermentation and alcohol formation
- blend ingredients to mimic the taste of alcohol without using any alcohol in the production process

We are proposing to clarify that the term alcohol free can be used on the label of any product marketed as an alcohol substitute drink (within the percentage ABV threshold to be agreed through this consultation), not just on labels for those products from which alcohol has been removed.

### **The de-alcoholised descriptor**

Current DHSC guidance is that the de-alcoholised descriptor should apply to products of up to 0.5% ABV. If the recommended alcohol free descriptor threshold were to be raised from 0.05% ABV to 0.5% ABV (as set out in the previous section), this would create 2 descriptors for the same ABV band, potentially creating confusion for consumers and industry.

'De-alcoholisation' is a term commonly used to refer to a manufacturing process, in which alcohol is removed from an alcoholic drink. It is therefore plausible that some consumers may not naturally associate this term with a description of alcoholic strength. Defra-commissioned [qualitative research on NoLo alcohol labelling](https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229) (<https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229>) found that some participants found the term de-alcoholised confusing and unclear, interpreting the term to mean a product which was once alcoholic and leaving participants unsure of the final alcohol content.

We are seeking views on whether to remove the term de-alcoholised as a recommended description of alcoholic strength.

However, unpublished consumer insights research from Alcohol Change UK indicates that some consumers do believe it is important to know whether a product once contained alcohol, even if no alcohol is present in the final product. Knowledge of the manufacturing process used may be particularly important for people who want or need to completely avoid all alcohol products, such as for religious or health reasons.

We are proposing to recommend that the term de-alcoholised can be used flexibly to describe the manufacturing method used.

This would mean that government guidance would allow a single product to simultaneously be described as alcohol free and de-alcoholised, much like an alcoholic beer can simultaneously display '4.2% ABV' and 'barrel brewed' on label.

### **The non-alcoholic descriptor**

Current DHSC guidance is that the term non-alcoholic should “not be used in conjunction with a name commonly associated with an alcoholic drink”, with an exception for non-alcoholic communion or sacramental wine. This position on the use of the term non-alcoholic is also set out in Defra guidance [Labelling spirit drinks](https://www.gov.uk/guidance/labelling-spirit-drinks) (<https://www.gov.uk/guidance/labelling-spirit-drinks>).

Some members of the alcohol industry have stated that the conditions of use for the non-alcoholic descriptor are too restrictive and should be allowed to apply to alcohol-like products containing no or small amounts of alcohol (for example, ‘non-alcoholic beer’). Some countries use the term non-alcoholic in this way, for example the United States.

Broadening the recommended use of the non-alcoholic descriptor may create unwanted overlap and confusion with the alcohol free descriptor. Non-alcoholic is a term commonly associated with soft drinks, such as lemonade and fruit juice, and maintaining the condition of use for non-alcoholic may be important to maintain a clear distinction between soft drinks and adult drinks designed to mimic the look and taste of alcohol. On the other hand, the Defra research on NoLo alcohol labelling suggested that some consumers naturally use the term alcohol free and non-alcoholic interchangeably to describe no-alcohol drinks.

We welcome views on the conditions of use for this descriptor in DHSC guidance.

## Displaying ABV content

For drinks containing over 1.2% ABV, it is a legal requirement that the product packaging or the label attached to the packaging must display the alcoholic strength by volume, to be indicated as a percentage to not more than one decimal place. It must be followed by the symbol ‘% vol.’ and may be preceded by the word ‘alcohol’ or the abbreviation ‘alc’, for example ‘alc 12.5% vol’ (the variant ‘12.5% alc/vol’ is also permitted).

There are no equivalent regulations mandating the display of ABV content for drinks up to 1.2% ABV. DHSC’s current low alcohol descriptor guidance suggests that labels for these drinks should include an indication of their maximum ABV. However, products containing no more than 0.5% ABV have an alternative option of including a statement that the product contains no alcohol.

Defra-commissioned [qualitative research on NoLo alcohol labelling](https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229) (<https://randd.defra.gov.uk/ProjectDetails?ProjectId=21229>) suggests that many consumers believe that a numerical ABV percentage is the clearest way to indicate the alcohol content of a drink, but that ABV content is not always clearly communicated on NoLo products. Using a clear ABV or descriptors such as alcohol free alongside category names was also seen as clearer and more appealing than labelling conventions currently allowed under regulations. Unpublished consumer insights research from Alcohol Change UK reported that consumer confusion about ABVs and descriptors is a key barrier to the use of alcohol free drinks as a means of reducing alcohol consumption.

The omission of ABV information on labels for products up to 0.5% ABV prevents consumers from being able to distinguish between 0.0% and 0.5% products, and this issue could be exacerbated if the alcohol free descriptor is raised to 0.5% ABV.

In addition, many products labelled as 0.0% still contain very small amounts of alcohol (up to 0.05% ABV) and the Defra research on NoLo alcohol labelling suggested that it is important for some consumers to know whether a product contains absolutely no alcohol, such as those abstaining for religious reasons, and uncertainty around this could restrict purchase.

We are seeking views on whether to update DHSC guidance to make it a recommended condition of use of the alcohol free descriptor to display ABV content on front of label.

We are also seeking views on whether retailers should make this information available at the point of purchase, for example when purchasing online.



## Legal status of the use of low alcohol descriptors

Low alcohol descriptor rules were previously defined in the Food Labelling Regulations 1996. These regulations expired on 13 December 2018 and, following public consultation, were replaced with non-statutory England-only guidance. The government committed to keep this guidance under review and to assess whether it is serving its intended purpose after a 3-year period. The government retains the power to reintroduce legislation on low alcohol descriptors under The Food Safety Act 1990.

While conditions for use of low alcohol descriptors are set out in guidance, there continues to be a legal framework around labelling of NoLo products. In particular, it is an offence for labels to be misleading under [section 15 \(1\) of the Food Safety Act 1990](#) ([https://www.legislation.gov.uk/ukpga/1990/16/section/15#:~:text=15%20False%20describing%20or%20presenting%20food.&text=shall%20be%20guilty%20of%20an%20offence.&text=any%20food%3B%20or-,%20\(b\)%20is%20likely%20to%20mislead%20as%20to%20the%20nature%20or,be%20guilty%20of%20an%20offence.](https://www.legislation.gov.uk/ukpga/1990/16/section/15#:~:text=15%20False%20describing%20or%20presenting%20food.&text=shall%20be%20guilty%20of%20an%20offence.&text=any%20food%3B%20or-,%20(b)%20is%20likely%20to%20mislead%20as%20to%20the%20nature%20or,be%20guilty%20of%20an%20offence.)). The Nutrition and Health Claims Regulation, which is enforced in England by the Nutrition and Health Claims (England) Regulations 2007, also requires nutrition and health claims not to be false, ambiguous or misleading.

Local trading standards departments are responsible for ensuring that labelling is compliant with the law and should have regard to the guidance on low alcohol descriptors when assessing compliance. A breach of the descriptor guidance could lead to enforcement action against the food business operator if it means that the labelling is misleading, inaccurate or unclear. Where applicable, the government also expects the courts to have regard to the guidance in proceedings before them.

Unpublished analysis by OHID found that in practice, more than half of products sold in the UK labelled as alcohol free are using the descriptor not as recommended by DHSC guidance. This includes both products produced in the UK and those imported from outside the UK.

While many NoLo producers are supportive of maintaining a voluntary approach, some producers and retailers have indicated that the absence of statutory rules on low alcohol descriptors has resulted in a lack of consistency in the approach taken across the industry.

We welcome views on whether we should reintroduce legislation on the use of low alcohol descriptors.

## Communicating the UK chief medical officers' low risk drinking guidelines

People have a right to accurate information and clear advice about alcohol and its health risks so they can make informed choices.

The importance of public health advice on the use of NoLo drinks has been raised by a range of stakeholders and we will be engaging with public health and clinical experts and consumer groups to help inform future work in this area.

The World Health Organization briefing [Health warning labels on alcoholic beverages](#) (<https://www.who.int/publications/i/item/9789240044449>) recommends labelling alcoholic beverages to increase awareness and ensure consumers make informed decisions.

In the UK, display of health warnings on the labels of alcoholic products is currently done on a voluntary basis. Since 2016, we have encouraged the alcohol industry to ensure the UK CMOs' low risk drinking guidelines are displayed on alcoholic drinks produced after 1 September 2019. To support this activity, the government published the guidance [Communicating the UK chief medical officers' alcohol guidelines](#) (<https://www.gov.uk/government/publications/communicating-the-uk-chief-medical-officers-alcohol-guidelines>). This outlines the core elements of the guidelines that we would wish to see communicated to the public, which are:

- the weekly drinking guideline
- guidelines on single occasion drinking episodes

- guidelines on pregnancy and drinking

Some health stakeholders have raised concerns about the lack of evidence related to the safety of NoLo drinks for specific individuals, such as on the fetus in pregnancy and those with a liver condition. They have called for the potential health risks of these drinks to be clearly labelled. Such labelling may be particularly important if the alcohol free descriptor threshold is raised from 0.05% ABV to 0.5% ABV.

Some industry producers have raised the risk that the inclusion of health warnings on NoLo product labels may have the adverse impact of discouraging individuals from consuming NoLo products in place of higher strength options.

We welcome views on whether we should issue additional government guidance that all alcohol substitute drinks display the UK CMOs' low risk drinking guidelines on labels.

## Age restriction warnings

The CMO for England's [guidance on the consumption of alcohol by children and young people](https://www.gov.uk/government/publications/alcohol-consumption-by-children-and-young-people) (<https://www.gov.uk/government/publications/alcohol-consumption-by-children-and-young-people>) recommends that an alcohol free childhood is the healthiest and best option. Alcohol can be harmful to children and young people, with health risks including:

- acute alcohol poisoning
- an increased risk of becoming involved in violence
- damage to the developing brain and liver

The Licensing Act 2003 prohibits the sale of alcohol to under 18s. It also prohibits the consumption of alcohol by under 18s in licensed premises, with the exception that 16 or 17 year olds accompanied by an adult can drink (but not buy) beer, wine or cider with a meal. Alcohol is defined within the Licensing Act as a product with an alcoholic strength above 0.5% ABV. This means that an alcohol substitute drink up to 0.5% ABV can be legally sold to children.

Children and young people have been identified by health stakeholders as at potential risk as a result of the growing NoLo market. Some stakeholders have raised concerns that availability of no-alcohol drinks to children and young people may act as a gateway into consumption of alcoholic drinks.

The general view from NoLo alcohol producers is that they consider NoLo drinks to be exclusively for adults.

Many retailers already restrict the sale of alcohol substitute drinks at 0.5% ABV and below to under 18s voluntarily, including through incorporating these products within the [Challenge 25 scheme](https://rasg.org.uk/) (<https://rasg.org.uk/>). However, some retailers have raised concerns that a lack of government guidance on this issue causes challenges with enforcement.

The government is clear that alcohol substitute drinks are intended for consumption by adults and should not be sold or supplied to children. We are working with alcohol producers, retailers and trade bodies to ask that they reflect this position in their codes and guidelines.

An age restriction warning on labels for all NoLo products, including those at 0.5% ABV and below, could act as a reminder to children, their parents or guardians, and retailers that these products are not suitable for under 18s.

We welcome views on whether the government should introduce guidance or regulations that an age restriction warning should be displayed on the label of all NoLo drinks. We also welcome views on any other measures government or industry can take to prevent the sale and supply of no-alcohol products up to 0.5% ABV to children and young people.

# Consultation questions

## Low alcohol descriptors

The government's expectations for how NoLo products may be described are currently set out in non-statutory guidance. Its purpose is to support the alcohol manufacturing and retail industries to market their products responsibly, with the aim of protecting the public and informing consumers. We are seeking views on the most appropriate conditions of use of descriptors for NoLo alcohol drinks, and whether we should re-introduce legislation in this area.

### The alcohol free descriptor

Current DHSC guidance recommends the following conditions of use of the non-alcoholic descriptor:

Alcohol free: this should only be applied to a drink from which the alcohol has been extracted if it contains no more than 0.05% ABV, and the products should also include the ABV (or state that they contain no alcohol) on the label in order to use the descriptor.

We are seeking views as to whether to change the threshold at which a product should be described as alcohol free from 0.05% ABV to 0.5% ABV.

#### Question

Do you think the upper strength threshold at which a drink may be described as alcohol free should be changed from 0.05% alcohol by volume (ABV) to 0.5% ABV?

- Yes
- No
- Don't know

Please explain your answer.

Current DHSC guidance recommends that the term alcohol free should be applied 'to a drink from which the alcohol has been extracted'. This description does not fully reflect the different methods used for manufacturing of NoLo drinks. We are seeking views on whether the term alcohol free should apply to any alcohol substitute drink (at no more than 0.5% ABV), not just those from which alcohol has been extracted.

#### Question

Do you think the suggested use of the alcohol free descriptor should be expanded to apply to any drink that meets the criteria of an alcohol substitute drink (up to a specified strength threshold)?

As defined in regulation 9 to The Soft Drinks Industry Levy Regulations 2018.

- Yes
- No
- Don't know

Please explain your answer.

### The de-alcoholised descriptor

Current DHSC guidance recommends the following conditions of use of the de-alcoholised descriptor:

De-alcoholised: this term should only be applied to a drink from which the alcohol has been extracted if it contains no more than 0.5% ABV and the product should also include an indication of its alcoholic strength (or state that it contains no alcohol).

If the recommended alcohol free descriptor threshold is raised to 0.5% ABV, this could create two descriptors at the same strength category. We are proposing to remove the term de-alcoholised as a description of alcoholic strength, but to continue to allow its use to denote the production method used to reduce the alcohol content of a product.

#### Questions

Do you think the term 'de-alcoholised' should be removed as a description of a product's alcoholic strength?

Drink with an ABV of 1.2% or less as defined in regulation 9 to The Soft Drinks Industry Levy Regulations 2018.

- Yes
- No
- Don't know

Please explain your answer.

Do you think the term 'de-alcoholised' should be recommended for use to indicate the production method used to reduce the alcohol content of a NoLo drink?

- Yes
- No
- Don't know

Please explain your answer.

#### **The non-alcoholic descriptor**

The current conditions of use of the non-alcoholic descriptor are:

Non-alcoholic: this should not be used in conjunction with a name commonly associated with an alcoholic drink. There is an exception for non-alcoholic wine where it is derived from unfermented grape juice and is intended exclusively for communion or sacramental use. The labelling or advertising of these non-alcoholic wines should make it clear that it is exclusively for such use.

#### Question

Do you think the term 'non-alcoholic' should be recommended for use with a name commonly associated with an alcoholic drink?

For example, using the term 'non-alcoholic beer' if no alcohol was used in the production process and the product does not contain any alcohol, and is not used with a protected product name under regulations.

- Yes
- No
- Don't know

Please explain your answer, and if answered yes please suggest conditions of use for this descriptor.

#### **Alcohol by volume content**

There are no regulations mandating the display of the alcoholic content on labels of drinks up to 1.2% ABV. The low alcohol descriptor guidance suggests that products using the low alcohol, de-alcoholised and alcohol free descriptors should include an indication of their maximum ABV on labels, however products containing no more than 0.5% ABV have an alternative option of including a statement that the product contains no alcohol.

#### Questions

Do you think that products should display the ABV content on the front of the label to be able to use the alcohol free descriptor?

- Yes
- No
- Don't know

Please explain your answer.

Do you think all alcohol substitute products at 1.2% ABV and below should include the ABV content on the front of the label, irrespective of whether a low alcohol descriptor is used?

- Yes
- No
- Don't know

Please explain your answer.

Do you think all alcohol substitute products at 1.2% ABV and below should include the ABV content at the point of their sale online, irrespective of whether a low alcohol descriptor is used?

- Yes
- No
- Don't know

Please explain your answer.

### **Legal status of low alcohol descriptors**

The use of the descriptors alcohol free, de-alcoholised, non-alcoholic and low alcohol is voluntary, but if they are used the conditions for their use are currently set out in non-statutory government guidance.

Question

Do you think the terms of use for low alcohol descriptors should be set in legislation?

- Yes
- No
- Don't know

Please explain your answer.

### **Potential effects on business of setting low alcohol descriptors in law**

Questions

What, if any, effects (monetised or non-monetised) do you think setting the terms of use for low alcohol descriptors in law would have on your business?

How long would it take your business to implement the legislation, if introduced?

### **Communicating UK chief medical officers' low risk drinking guidelines**

There is currently no expectation, either in guidance or in regulations, that NoLo alcohol drinks include health warnings on labels. The government has produced guidance for communicating the UK chief medical officers' (CMOs') low risk drinking guidelines on labels and industry has committed to include this information on the labels of alcoholic products. We are seeking views and evidence on whether NoLo drinks should display the UK CMOs' low risk drinking guidelines on NoLo products.

#### Questions

Which, if any, of the CMOs' low risk drinking guidelines should be displayed on alcohol substitute drinks at or below 0.05% ABV?

- Weekly drinking guidelines
- Single occasion drinking guidelines
- Pregnancy and drinking
- None of the guidelines

Which, if any, of the CMOs' low risk drinking guidelines should be displayed on alcohol substitute drinks above 0.05% ABV and up to 1.2% ABV?

- Weekly drinking guidelines
- Single occasion drinking guidelines
- Pregnancy and drinking
- None of the guidelines

## **Business competitiveness and international trade of NoLo products**

#### Questions

Do you think the current alcohol free descriptor threshold of 0.05% ABV in England affects the ability of UK NoLo producers to compete with producers in other countries?

- Yes
- No
- Don't know

Please provide evidence of how the current alcohol free descriptor of 0.05% ABV in England affects the ability of UK NoLo producers to compete with producers in other countries.

## **Achieving government public health policy aims**

#### Questions

Do you think changes to the descriptors, if implemented, would help your business to increase availability of NoLo products?

- Yes
- No
- Don't know

Do you think changes to the descriptors, if implemented, will help to deliver government's policy aims for reducing alcohol related harms?

- Yes
- No

- Don't know

Please provide evidence to support your answer.

If implemented, do you think changes to the descriptors would affect whether consumers substitute standard-strength alcohol products with NoLo products?

For example, through encouraging substitution of standard-strength alcohol with NoLo alternatives.

- Yes
- No
- Don't know

Please provide evidence to support your answer.

## Costs of producing NoLo alcohol products

Questions

What are the estimated costs associated with producing NoLo alcohol products per litre by product category?

How does this compare with the estimated costs associated with producing standard-strength alcohol products per litre per product category?

## Age restriction labelling

It is illegal to sell alcoholic products with a strength above 0.5% ABV to children and young people. Many retailers already restrict the sale of products at 0.5% ABV and below to under 18s on a voluntary basis. We are seeking views on measures government or industry can take to prevent children and young people from accessing and consuming alcohol substitute drinks up to 0.5% ABV.

Questions

Do you think alcohol substitute drinks with a strength of 0.5% ABV or below should display an age restriction warning on label?

- Yes
- No
- Don't know

Please explain your answer.

Do you think government or industry should take any other measures to prevent children and young people from accessing and consuming alcohol substitute drinks of 0.5% ABV or below?

- Yes - government
- Yes - industry
- Yes - government and industry
- No
- Don't know

Please explain your answer. If you selected yes, please provide detail about what measures you suggest.

## Shifting the market from sales and promotion of alcoholic products towards NoLo alternatives

### Questions

Do you think alcohol producers should do more to encourage consumers to substitute standard-strength alcohol with NoLo products in order to reduce alcohol harms as described in the consultation document?

- Yes
- No
- Don't know

Please provide details.

Do you think government should do more to encourage consumers who drink above CMOs' lower risk guidelines to substitute standard-strength alcohol with NoLo products in order to reduce alcohol harms?

- Yes
- No
- Don't know

Please provide details.

What outcomes do you think the government should monitor to assess whether the policy objectives set out in this consultation are being met?

Include what data sources you think could be used to support this monitoring.

## Monitoring impact and equalities

We are considering the impacts of any potential changes to NoLo labelling guidance on individuals and groups with protected characteristics, as defined in the Equality Act 2010. We have published an [equality impact assessment \(https://www.gov.uk/government/consultations/updating-labelling-guidance-for-no-and-low-alcohol-alternatives\)](https://www.gov.uk/government/consultations/updating-labelling-guidance-for-no-and-low-alcohol-alternatives) alongside this consultation document.

### Questions

Do you have comments on the proposed outcome measures for monitoring the impact of proposals set out in this consultation, if they are implemented, as set out in the 'Summary of policy aims' section of the consultation?

Do you have evidence on whether the proposals set out in this consultation document, if implemented, may disproportionately affect people with protected characteristics as set out in the Equality Act 2010?

## Personal information

We are collecting some personal information. These questions are optional and will only appear once. You can read more about the personal information we're collecting, as well as your rights as a respondent under the UK General Data Protection Regulation, in the privacy notice in section 11.

## How to respond



You can respond to this consultation by completing the [online survey on updating labelling guidance for no and low-alcohol alternatives](https://consultations.dhsc.gov.uk/en/64ff3af4197cd63eed0df43c) (<https://consultations.dhsc.gov.uk/en/64ff3af4197cd63eed0df43c>).

The consultation will be open for 8 weeks. You should send your response by 11:59pm on Thursday 23 November 2023.

## Next steps

Once we have had the opportunity to consider the responses to the consultation, we will publish a response on GOV.UK.

## Campaign responses

We recognise that respondents may choose to use some standard text to inform their response. Campaigns are when organisations (or individuals) coordinate responses across their membership or support base, often by suggesting a set of wording for respondents to use. Campaign responses are usually very similar or identical to each other.

For this consultation, campaign responses may be analysed separately to other responses to ensure the breadth of views received can be summarised effectively and efficiently. All campaign responses will be taken into account in the final analysis of public views and campaigns help provide an indication of the strength of feeling on an issue.

## Privacy notice

### Introduction

This notice sets out how we will use the information collected through this online consultation, as well as your rights as a respondent under the UK General Data Protection Regulation (UK GDPR).

### Data controller

The Department of Health and Social Care (DHSC) is the data controller.

### What information we collect

When you respond to the consultation online, we will collect information on:

- whether you are responding as an individual member of the public or on behalf of an organisation
- the name of your organisation and where your organisation operates or provides services (if responding on behalf of an organisation)
- what sector you work in
- what the main focus of your work is
- your internet protocol (IP) address (this is for security purposes and will not be attached to your survey response)

If volunteered by you, we will also collect information on:

- where you live in the UK
- your email address
- demographic information (age, sex, gender, religious belief)
- any other personal information you may provide in response to free text questions in the survey

## **How we use your information**

We collect your information as part of the consultation process:

- for statistical purposes, for example to understand how representative the results are and whether views and experiences vary across organisations and different audiences so we can ensure that our consultation considers the views and experiences of different demographic groups and with different knowledge and experience of NoLo labelling.
- so that DHSC can contact you for further information about your response

If you agree, DHSC can contact you to allow you to amend or delete your response or to send you a reminder before the consultation closes if you have not submitted your final response.

## **Legal basis for processing your information**

The legal basis for processing personal data as part of this consultation is Article 6(1) (e) of the UKGDPR which permits processing that is necessary to perform a task in the public interest or for an organisation's official functions. DHSC has statutory duties in relation to the promotion and the provision of the nation's health service, including public health functions, as outlined in the NHS Act 2006 and the Health and Social Care Act 2012.

The legal basis for processing any special category data you choose to provide as part of this consultation is Article 9(2)(j) of the UKGDPR which permits processing that is necessary for reasons of public interest in the area of public health.

## **Who your information may be shared with**

Responses to the online consultation may be seen by:

- DHSC officials managing this consultation process and analysing the responses
- Department for Environment, Food and Rural Affairs (Defra) officials working on alcohol policy
- devolved administration colleagues working on alcohol policy
- DHSC's third-party supplier (SurveyOptic), which is responsible for running and hosting the online survey

Officials at Defra and the devolved administrations will receive anonymised data only.

## **International data transfers and storage locations**

Storage of data by DHSC is provided via secure computing infrastructure on servers located in the European Economic Area. DHSC platforms are subject to extensive security protections and encryption measures.

Storage of data by SurveyOptic is provided via secure servers located in the UK.

## How long we keep your information

We will hold your personal information for up to one year after the online consultation closes. Anonymised information may be kept indefinitely.

DHSC will only retain your personal information for as long as either:

- it is needed for the purposes of reviewing the low alcohol descriptor guidance
- the law requires us to

This means that your information will be held by DHSC for up to 1 year.

SurveyOptic will securely erase the information held on their system one year after the online consultation closes.

## How we protect your information and keep it secure

DHSC uses a range of technical, organisational and administrative security measures to protect any information we hold in our records from:

- loss
- misuse
- unauthorised access
- disclosure
- alteration
- destruction

We have written procedures and policies that are regularly audited and reviewed at a senior level.

SurveyOptic is Cyber Essentials certified. This is a government backed scheme that helps organisations protect themselves against the most common cyber attacks.

## Your rights

By law, you have a number of rights and processing your data does not take away or reduce these rights, under the UK GDPR and the UK Data Protection Act 2018.

You have the right to:

- ask for and receive copies of information about you
- get information about you corrected if you think it's inaccurate
- limit how your information is used, for example you can ask for it to be restricted if you think it's inaccurate
- object to your information being used
- get information deleted

Some of these rights might not apply when the information is being used for research. We will let you know if this is the case.

## Contact us or make a complaint

We will always try to respond to concerns or queries that you have about your data.

If you are unhappy about how your information is being used, or if you want to complain about how your data is used as part of this consultation, you should email [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk) or write to:

Data Protection Officer  
1st Floor North  
39 Victoria Street  
London  
SW1H 0EU

If you are still not satisfied, you can complain to the Information Commissioner's Office (ICO). You can find out how to contact them at the [ICO website \(https://ico.org.uk/\)](https://ico.org.uk/). Their postal address is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## Changes to this privacy notice

We keep our privacy notice under regular review, and we will update it if necessary. All updated versions will be marked by a change note on the consultation page.

## References

Anderson P, Kokole D, Llopis EJ, Burton R and Lachenmeier DW. [Lower strength alcohol products - a realist review-based road map for European policy making \(https://www.mdpi.com/2072-6643/14/18/3779\)](https://www.mdpi.com/2072-6643/14/18/3779). *Nutrients* 2022: volume 14, issue 18, article number 3779.

Bhattacharya A, Angus C, Pryce R, Holmes J, Brennan A and Meier PS. [How dependent is the alcohol industry on heavy drinking in England? \(https://onlinelibrary.wiley.com/doi/10.1111/add.14386\)](https://onlinelibrary.wiley.com/doi/10.1111/add.14386) *Addiction* 2018: volume 113, issue 12, pages 2225-2232.

Blackwell AKM, De-Loyde K, Hollands GJ, Morris RW, Brocklebank LA, Maynard OM, Fletcher PC, Marteau TM, Munafò MR. [The impact on selection of non-alcoholic vs alcoholic drink availability: an online experiment \(https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-08633-5\)](https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-020-08633-5). *BMC Public Health* 2020: volume 20, article number 526.

Bryazka D and others . [Population-level risks of alcohol consumption by amount, geography, age, sex, and year: a systematic analysis for the global burden of disease study 2020 \(https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(22\)00847-9/fulltext\)](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(22)00847-9/fulltext). *The Lancet* 2020: volume 400, issue 10347, pages 185-235.

Caballeria E, Pons-Cabrera MT, Balcells-Olivero M, Braddick F, Gordon R, Gual A, Matrai S and Lopez-Pelayo H. ["Doctor, can I drink an alcohol-free beer?" Low-alcohol and alcohol-free drinks in people with heavy drinking or alcohol use disorders: systematic review of the literature \(https://doi.org/10.3390/nu14193925\)](https://doi.org/10.3390/nu14193925). *Nutrients* 2022: volume 14, issue 19, article number 3925.

Clarke N, Blackwell AKM, Ferrar J, De-Loyde K, Pilling MA, Munafò MR, Marteau TM and Hollands GJ. [Impact on alcohol selection and purchasing of increasing the proportion of non-alcoholic versus alcoholic drinks: randomised controlled trial \(https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1004193\)](https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1004193). *PLOS Medicine* 2023: volume 20, issue 3, article number e1004193.

Healey C, Rahman A, Faizal M and Kinderman P. [Underage drinking in the UK: changing trends, impact and interventions. A rapid evidence synthesis \(https://www.sciencedirect.com/science/article/pii/S0955395913001230?via%3Dihub\)](https://www.sciencedirect.com/science/article/pii/S0955395913001230?via%3Dihub). *International Journal of Drug Policy* 2014: volume 25, issue 1, pages 124-132.

- HM Treasury. [Treasury minutes: Government response to the Committee of Public Accounts on the Forty-eighth to the Fifty-fourth reports from Session 2022 to 2023 \(PDF, 3.5MB\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1170782/E02946343_HMT_Treasury_Minutes_CP_902_Web_Accessible.pdf) ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1170782/E02946343\\_HMT\\_Treasury\\_Minutes\\_CP\\_902\\_Web\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1170782/E02946343_HMT_Treasury_Minutes_CP_902_Web_Accessible.pdf)). HMT 2023.
- Liang W and Chikritzhs T. [Age at first use of alcohol and risk of heavy alcohol use: a population-based study](https://www.hindawi.com/journals/bmri/2013/721761/) (<https://www.hindawi.com/journals/bmri/2013/721761/>). Hindawi Publishing Corporation, BioMed Research International 2013: volume 2013, article ID 721761.
- Llopis EJ, O'Donnell A and Anderson P. [Impact of price promotion, price, and minimum unit price on household purchases of low and no alcohol beers and ciders: descriptive analyses and interrupted time series analysis of purchase data from 70,303 British households, 2015 to 2018 and first half of 2020](https://www.sciencedirect.com/science/article/pii/S0277953621000228?via%3Dihub) (<https://www.sciencedirect.com/science/article/pii/S0277953621000228?via%3Dihub>). Social Science and Medicine 2021: volume 270, article number 113690.
- Public Health England. [The public health burden of alcohol and the effectiveness and cost-effectiveness of alcohol control policies: an evidence review](https://www.gov.uk/government/publications/the-public-health-burden-of-alcohol-evidence-review) (<https://www.gov.uk/government/publications/the-public-health-burden-of-alcohol-evidence-review>). PHE 2016.
- Popova S, Dozet D, Laboni SA, Brower K and Temple V. [Why do women consume alcohol during pregnancy or while breastfeeding?](https://onlinelibrary.wiley.com/doi/10.1111/dar.13425) (<https://onlinelibrary.wiley.com/doi/10.1111/dar.13425>) Drug and Alcohol Review 2022: volume 41, issue 4, pages 759-777.
- Quain D. [The enhanced susceptibility of alcohol-free and low alcohol beers to microbiological spoilage: implications for draught dispense](https://onlinelibrary.wiley.com/doi/10.1002/jib.670) (<https://onlinelibrary.wiley.com/doi/10.1002/jib.670>). Journal of the Institute of Brewing 2021: volume 127, issue 4, pages 406-416.
- Rao R and Topiwala A. [Alcohol use disorders and the brain](https://onlinelibrary.wiley.com/doi/10.1111/add.15023) (<https://onlinelibrary.wiley.com/doi/10.1111/add.15023>). Addiction 2020: volume 115, issue 8, pages 1580-1589.
- Rehm J, Lachenmeier DW, Llopis EJ, Imtiaz S and Anderson P. [Evidence of reducing ethanol content in beverages to reduce harmful use of alcohol](https://www.thelancet.com/journals/langas/article/PIIS2468-1253(16)30013-9/fulltext) ([https://www.thelancet.com/journals/langas/article/PIIS2468-1253\(16\)30013-9/fulltext](https://www.thelancet.com/journals/langas/article/PIIS2468-1253(16)30013-9/fulltext)). The Lancet 2016: volume 1, issue 1, pages 78-83.
- Rehm J, Rovira P, Manthey J and Anderson P. [Reduction of alcoholic strength: does it matter for public health?](https://www.mdpi.com/2072-6643/15/4/910) (<https://www.mdpi.com/2072-6643/15/4/910>) Nutrients 2023: volume 15, issue 4, article 910.
- Sasso A, Hernández-Alava M, Holmes J, Field M, Angus C and Meier P. [Strategies to cut down drinking, alcohol consumption, and usual drinking frequency: evidence from a British online market research survey](https://www.sciencedirect.com/science/article/pii/S027795362200586X?via%3Dihub) (<https://www.sciencedirect.com/science/article/pii/S027795362200586X?via%3Dihub>). Social Science and Medicine 2022: volume 310, article number 115280.
- Shemilt I, Hendry V and Marteau TM. [What do we know about the effects of exposure to 'low alcohol' and equivalent product labelling on the amounts of alcohol, food and tobacco people select and consume? A systematic review](https://bmcpubhealth.biomedcentral.com/articles/10.1186/s12889-016-3956-2) (<https://bmcpubhealth.biomedcentral.com/articles/10.1186/s12889-016-3956-2>). BMC Public Health 2017: volume 17, article number 29.
- Suiker IM and Wösten HAB. [Spoilage yeasts in beer and beer products](https://www.sciencedirect.com/science/article/pii/S2214799322000170?via%3Dihub) (<https://www.sciencedirect.com/science/article/pii/S2214799322000170?via%3Dihub>). Current Opinion in Food Science 2022: volume 44, article number 100815.
- Ujhelyi Gomez K, Goodwin L, Chisholm A and Rose AK. [Alcohol use during pregnancy and motherhood: attitudes and experiences of pregnant women, mothers, and healthcare professionals](https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0275609) (<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0275609>). PLOS ONE 2022: volume 17, issue 12, article e0275609.
- University of Sheffield analysis. Data related to on-trade sales was provided by CGA - OPMe and analysed by the University of Sheffield independently of CGA - OPMe. Data related to off-trade sales was provided by Information Resources (UK) Ltd and

analysed by the University of Sheffield independently of Information Resources (UK) Ltd.

Vasiljevic M, Frings D, Pilling M and Marteau TM. [Do alcohol product labels stating lower-strength verbal description, percentage alcohol-by-volume, or their combination affect wine consumption? A bar laboratory adaptive randomised controlled trial](https://onlinelibrary.wiley.com/doi/full/10.1111/add.15444) (<https://onlinelibrary.wiley.com/doi/full/10.1111/add.15444>). *Addiction* 2021: volume 116, issue 9, pages 2339-2347.

Weitzman M and Lee L. [Similarities between alcohol and tobacco advertising exposure and adolescent use of each of these substances](https://www.jsad.com/doi/10.15288/jsads.2020.s19.97) (<https://www.jsad.com/doi/10.15288/jsads.2020.s19.97>). *Journal of Studies on Alcohol and Drugs, Supplement* 2020: volume s19, pages 97-105.

[↑ Back to top](#)

---

**OGI**

All content is available under the [Open Government Licence v3.0](#), except where otherwise stated

[© Crown copyright](#)