



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

## CODEX COMMITTEE ON FOOD LABELLING

## Forty-eighth Session

## Quebec City, Canada

27 October – 1 November 2024

## DISCUSSION PAPER ON THE LABELLING OF ALCOHOLIC BEVERAGES

(Prepared by the World Health Organization (WHO))

**BACKGROUND**

1. The 47th Session of the Committee on Food Labelling (CCFL47)<sup>1</sup> agreed to retain the item on labelling of alcoholic beverages on its Agenda and requested WHO to prepare a discussion paper for consideration at CCFL48. CCFL47 agreed that the Codex Secretariat would issue a Circular Letter (CL) on possible future actions on this matter and that responses to the CL would inform the development of the aforementioned discussion paper.
2. In January 2024, CL 2024/13-FL<sup>2</sup> requested views and comments from Codex Members and Observers on Codex's possible actions on alcoholic beverage labelling. Considering that the existing mandatory labelling requirements in Codex texts seem not consistently applied to alcoholic beverages across Codex Members and considering that health information related to alcohol consumption is currently not covered by Codex texts, Codex Members and Observers were invited to respond to the questionnaire in CL 2024/13-FL on whether they would agree for the CCFL to develop specific provisions on mandatory labelling requirements for alcoholic beverages, e.g., health and nutrition-related information, restrictions, exemptions, possible links between alcohol and health outcomes; and, if such provisions were to be developed, to outline possible scenarios for the development of mandatory requirements to be submitted for consideration by the CCFL48.
3. Forty-nine (49) Codex Members, one (1) Member Organization and seven (7) Observers responded to CL2024/13-FL. These replies and a list of national /regional legislations are available here ([Replies, List](#)).
4. This Discussion Paper synthesizes the responses and recommendations by Codex's Members and Observers to the four main questions and twenty-six sub-questions included in CL 2024/13-FL and identifies options for future work on alcoholic beverage labelling by CCFL.

**SUMMARY OF ANALYSIS**

5. This section summarises the analysis of the replies to the questions raised in CL 2024/13-FL. A full analysis of the replies is available [here](#).

**Question 1.** Would you agree to develop specific provisions on mandatory labelling tailored to alcoholic beverages to address the WHO recommendations included in the Global Action Plan on Alcohol 2022-2030 and the related menu of policy options and cost-effectiveness interventions on the labelling of alcoholic beverages endorsed by the 76th Session of the World Health Assembly in May 2023 which would meet the commitments of Members?

6. **Health-Related Information.** A majority of respondents strongly agree that CCFL should consider developing mandatory labelling requirements on health-related information tailored to alcoholic beverages currently not covered by Codex standards and texts. This is based on the view that information is essential for enabling consumers to make informed choices. Health-related information could include alcohol by volume -the most

<sup>1</sup> REP23/FL, paragraph 143. Available at: [https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?Ink=1&url=https%25A%25F%25Fworkspace.fao.org%25Fsites%25Fcodex%25FMeetings%25FCX-714-47%25FFINAL%252520REPORT%2525FREP23\\_FL.e.pdf](https://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?Ink=1&url=https%25A%25F%25Fworkspace.fao.org%25Fsites%25Fcodex%25FMeetings%25FCX-714-47%25FFINAL%252520REPORT%2525FREP23_FL.e.pdf)

<sup>2</sup> [CL 2024/13-FL](#)

cited gap in Codex texts with strong support, drinking guidelines, risks of consuming alcohol during pregnancy, risks of drinking and driving and legal age limits for purchasing alcohol.

7. **Nutrition-Related Information.** Many respondents strongly or somewhat agree that CCFL should consider developing mandatory labelling requirements on nutrition-related information tailored to alcoholic beverages. However, some were undecided or strongly disagreed with these views. Most respondents had a consensus that, at least, energy value, allergens, additives, gluten and other ingredients causing allergies or intolerance are essential information for consumers and should be displayed on alcoholic beverage labels.
8. **Restrictions on Nutrition and Health Claims.** A large majority of respondents strongly agree that CCFL should consider developing mandatory restrictions on nutrition and health claims tailored to alcoholic beverages. This is based on the view that allowing such claims on labels could mislead consumers into believing that alcoholic beverages are healthy and, as a result, promote alcohol consumption.
9. **Exemptions,** e.g., for low levels of alcohol by volume. There is a split of opinions on whether exemptions should apply to alcoholic beverages. A small majority of respondents somewhat or strongly disagree that any exemptions should apply to alcoholic beverages, considering inconsistent evidence regarding the effects of low levels of alcohol consumption.
10. **Possible links between alcohol and health outcomes.** Most respondents strongly or somewhat agree that there is a need to develop mandatory labelling requirements related to health risks associated with alcohol consumption, especially on possible links between alcohol and cancer and other health outcomes. These requirements enable consumers to make informed choices and support Codex Members in pursuing international commitments, e.g. WHO Global Alcohol Action Plan 2022-2030 and Sustainable Development Goals, target 3.5.

**Question 2.** Considering your above answers, what options would you consider for the development of specific provisions on mandatory labelling tailored to alcoholic beverages?

11. **Revision of existing Codex texts.** Respondents strongly support revising existing Codex standards and related texts to ensure they apply to alcoholic beverages and to include mandatory provisions tailored to alcoholic beverages. The revision of existing Codex texts is the respondents' preferred option.
12. **Development of new Codex standard.** Given the specificities of alcoholic beverages, the majority of respondents also support the need to develop a new Codex standard for alcoholic beverage labelling as an alternative to revising existing Codex texts.

**Question 3.** To address comments made by some Codex Members since CCFL44 on whether alcoholic beverages fall under the Codex definition for food as stated in the Procedural Manual and the *Codex General Standard for the Labelling of Prepackaged Foods*, would you consider revising the existing definitions or developing new definitions in relevant Codex texts? Please explain.

13. **Definitions.** There is a split opinion on whether CCFL should consider working on revising the definition of "food" in existing Codex texts to specifically include alcoholic beverages and/or developing new definitions for "drinks" and "non-alcoholic drinks". About half of the respondents consider that the existing definitions are sufficiently clear. In contrast, the other half believe that it would be justifiable to clarify the applicability of existing texts to alcoholic beverages because this does not seem consistently applied and recognized by Codex Members. Some respondents suggested developing a definition of "alcoholic beverages".

**Question 4.** Please provide any additional comments or suggestions that Codex should consider regarding alcoholic beverage labelling.

14. Several Members and Observers provided extensive comments about the importance of visible labels on the container rather than QR codes, addressing the online sale of alcohol where only the front label of the product is shown, and the need for clarifying some of the topics in CL 2024/13-FL including how the revisions would be incorporated into existing Codex texts. Some respondents stated that alcoholic beverage labelling should be addressed in national regulatory frameworks to account for the different religious and cultural factors.

## **CONCLUSION**

15. Most Members and Observers support initiating new work on alcoholic beverage labelling to address the gaps, lack of clarity in existing Codex texts and the low uptake in national and regional contexts. The level of support

varies across potential areas, with some respondents expressing reservations about the scope of the work and others not supporting any CCFL work.

16. Respondents recognize ongoing national and regional efforts to regulate alcoholic beverage labelling. These efforts remain, however, diverse and inconsistent. Global harmonization and standardization would protect consumers' health and ensure fair trade practices.
17. Respondents consider CCFL's work on alcoholic beverage labelling critical, noting the health, economic and other societal negative consequences of alcohol consumption and the importance of informing consumers and protecting their health in line with Members' national and international commitments. Therefore, a proposal is made for the CCFL to consider the recommendations made by the respondents to CL 2024/13-FL.

### **RECOMMENDATIONS**

18. Based on the responses to the CL 2024/13-FL, CCFL48 is invited to consider:
  - a) Developing mandatory labelling requirements tailored to alcoholic beverages and determining the scope of such work considering the respondents' proposals and level of support on:
    - Health-related information;
    - Nutrition-related information;
    - Restrictions on nutrition and health claims;
    - Exemptions; and,
    - Possible links between alcohol and health outcomes.

This recommendation is based on the view that existing Codex texts do not sufficiently address the specificities needed for alcoholic beverages, namely alcohol content (the most cited gap) and the risks of consuming alcohol during pregnancy, drink-driving, legal age limits for purchasing alcohol, drinking guidelines and possible links between alcohol and health outcomes. The recommendation is also based on the view that Codex texts do not sufficiently or adequately address the specificities of alcoholic beverage labelling in terms of nutrient declaration, e.g., calory value, allergens, glutens, additives; restrictions on nutrition and health claims and exemptions for alcoholic beverages.

- b) Revising the standard definition of food and developing new standard definitions, namely:
  - Revision of the standard definition of "*food*" to explicitly include alcoholic beverages;
  - Development of a standard definition of "*drinks*", including alcoholic beverages;
  - Development of a standard definition of "*non-alcoholic drinks*";
  - Development of a standard definition of "*alcoholic beverages*".

This recommendation is based on the view of many respondents stating that current Codex texts are not sufficiently clear on whether the existing definition of food includes alcoholic beverages and whether drinks, included in the definition of food but not defined in the Codex texts, include alcoholic beverages. It is also based on the input expressed by some respondents regarding the need to distinguish between alcoholic beverages and non-alcoholic drinks. Some respondents proposed to develop a standard definition of alcoholic beverages.

- c) Revising and amending existing Codex standards and related texts to include specific provisions on:
  - Applicability of existing Codex texts to alcoholic beverages.
  - Mandatory labelling requirements tailored to alcoholic beverages developed by CCFL under paragraph a).
  - Revised standard definition and new standard definitions developed by CCFL under paragraph b).

This recommendation is based on the view that gaps exist in current Codex texts. These revisions could be done by consequential amendments in the case of minor clarifications/changes or through a full-scale revision of the existing Codex standards and related texts to include the new labelling requirements.

19. In addition to the option described in paragraph 16 above, CCFL may consider the alternative of developing a new Codex standard exclusively dedicated to alcoholic beverage labelling. This recommendation is based on the view that alcoholic beverages are non-ordinary food and that a new ad-hoc standard could provide a comprehensive framework to address the specificities of alcoholic beverage labelling, protect consumers and

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prevent the health risks associated with alcohol consumption. According to some respondents, the standalone standard would better streamline labelling practices for alcoholic beverages internationally, considering the increasing global trade volume and the need to harmonize national and regional regulations and standards for alcoholic beverages.