



Message On A Bottle -

Does the public have enough information about what they are drinking?



Alcohol Concern
Making Sense of Alcohol

Alcohol Concern

Alcohol Concern is the national agency on alcohol misuse campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.

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Executive summary

Supermarkets are contributing to an epidemic of heavy drinking by promoting cheap alcohol that is poorly labelled. Many of the supermarkets' corporate social responsibility statements (where they exist with regards to alcohol) are totally at odds with their actual practice.

Alcohol Concern has been looking at how much information is available to the public about the unit content of the alcohol products they are buying. Looking at beer, wine and spirits that were heavily promoted by branches of five major supermarkets we assessed the labels of the products for five key pieces of information – unit content, information on sensible drinking levels, guidance around drinking and pregnancy, the Know Your Limits government message and the Drinkaware website.

This snap-shot found that only 28 out of the 50 promoted products we looked at had unit information on the labels (56%). Equally as worrying, only nine out of the 50 promoted products displayed sensible drinking levels on the labels (18%). Only two promoted products (4%) had all five elements suggested by the Department of Health. The public is currently being given insufficient information to be able to know how much they are drinking and what level of drinking is healthy.

Current legislation means that consumers are often given more content and health information if they drink a non-alcoholic beer such as Kaliber than if they drink a standard beer. Alcohol Concern believes that this disparity is totally at odds with the harms alcohol causes to individuals, families and communities. It is also at odds with the government's own agenda of promoting choice and providing information so that individuals can make healthy decisions about their lifestyles.

The public has a right to know how much they are drinking and what levels of consumption are safe. A recent survey by Alcohol Concern found that 94.5% of 1,088 respondents agreed that prominent information about the total units per drink of alcohol should be displayed wherever alcohol is sold. Alcohol costs the UK economy more than £25 billion pounds a year, with £2.5bn of that taken up with NHS costs.

We also assessed the supermarkets' own brand alcohol products. 95% of own brand products had unit labelling but only 44% displayed sensible drinking levels. This clearly shows that supermarkets are aware that they have a responsibility to provide consumers with information yet their practice in promoting poorly labelled products is contrary to this knowledge.

Consumers need information to make healthy choices about their consumption and supermarkets need to be more responsible in the way they promote alcohol.

Drinks producers have failed to comply with the voluntary agreement they made with the government to improve their labelling. Government must now take firm action to help consumers understand how much alcohol is in what they are drinking and what the health consequences are if they drink too much.

We have made the following recommendations which we believe are sensible and proportionate to the detrimental health impact that alcohol can have.

Recommendation 1

All pre-packaged alcoholic beverages should be required, by law, to display its unit content. This information must be accompanied with information about sensible drinking levels for men and women as set out by the Chief Medical Officer. This information must be within the same field of vision, the numbers must be at least 3mm high and must be horizontal to the level of the product so that it can be easily read by consumers. This new standard must be mandated by the Food Standards Agency as the current voluntary agreement between the drinks industry and the government has been ineffective.

Recommendation 2

All pre-packaged alcoholic products should include space for a government defined health warning. These messages would be similar to those on cigarette packages. Messages might include statements such as: "Drinking above sensible limits puts you at risk of throat, mouth and larynx cancer". These messages would have to be determined by the Department of Health and would have to have a specified size and place on alcoholic products. Industry defined messages are insufficient. The phrase 'Please drink responsibly' is too general; offering no information about what responsible drinking actually is.

Recommendation 3

As responsible retailers supermarkets should not promote alcoholic products which do not have clear unit labelling; information about sensible drinking levels and a warning about drinking whilst pregnant or trying to conceive.

Recommendation 4

Off-licenses, including supermarkets, should display information about what sensible drinking levels are and the health consequences of drinking to excess at any point where alcohol is displayed or for sale. This should be brought in through a Mandatory Code on Alcohol Sales, which the Home Office is currently consulting on.

Recommendation 5

Producers and retailers of alcohol should never use a bottle or glass symbol with a number inside it for any other purpose than to show unit content of a product. This principle should extend across all alcohol products, especially on labels and at point-of-sale. These symbols are frequently used to display unit information and to use this iconography for any other purpose is misleading and could confuse consumers. This should form part of the Food Standards Agency labelling regulations and its implementation overseen by Trading Standards.

Recommendation 6

Supermarkets should sign up to a 'Supermarkets Charter on The Sensible Sale and Promotion of Alcohol'. Our visits showed that practice varied hugely between different supermarkets and more effort must be made to ensure retailers are responsible in the way they sell alcohol. This charter could include such things as:

- An end to alcohol loss-leading
- Not promoting alcohol at the entrance of supermarkets
- Not promoting alcohol at till points
- Ensuring that promotions on alcohol are accompanied with appropriate health information

Alcohol Concern will work with the industry, if they are willing to engage in the debate, to help draw up a charter which is both workable, sensible and does not contravene competition rules. If supermarkets are unwilling to amend their practice government should use existing powers to mandate against irresponsible practice.

Recommendation 7

The government should look again at introducing a minimum price on alcohol as recommended by the Chief Medical Officer and as proposed by the Scottish Government. A minimum price of 50p per unit would eliminate some of the most irresponsible promotions as well as having a significant impact in reducing alcohol-related hospital admissions, crime and work absenteeism.

Introduction

Accurate and clear information about the food and drink you consume is essential for making healthy and informed choices. Most food provides clear information about its nutritional content and its relationship to recommended maximum daily amounts. In July 2008 the government launched a Healthy Food Code of Good Practice¹ which aims to move food producers towards clear front-of-packet labelling. Many large retailers, including major supermarkets, have adopted this scheme and have placed clearer labels on the front of food products indicating its relationship to guideline daily amounts and in some cases highlighting if a product is particularly high in salt, fat or sugar.

Whilst there is some dispute about which labelling system is preferable for food products this is in stark contrast to alcoholic beverages where there is insufficient labelling of even the most basic sort. They often have less content information on them than soft drinks, non-alcoholic beers and even water.

Alcohol is not an ordinary commodity, it is a legal and licensed drug, which if abused causes harm to the consumer and often can have an impact on wider society. Drinking in moderation is a normal and enjoyable part of many people's lives. Often, however, consumers are given insufficient information about the content of what they are drinking in order to make healthy choices.

Alcohol units are a standardised way in which different beverages with varying strengths of alcohol can be compared and measured. This standard way of calculating alcohol content can be compared across all drinks and ties in with the government's guidelines around safe and sensible drinking.

There is a large and authoritative body of medical research² which has determined what constitutes safe levels of drinking. The government recommends that men should not regularly drink more than 3-4 units per day and women should not regularly drink more than 2-3 units per day. One unit equals 10ml of alcohol.

Calculating the units of a drink relies on knowing the alcoholic strength of a drink (the ABV), the quantity of the drink (in millilitres) and knowing the formula for unit calculation. A consumer is likely to need a calculator to be able to make the unit calculation even if they knew what the formula for calculating units is (volume of drink in millilitres multiplied by the ABV and then dividing that by 1000). We do not expect consumers to calculate the calorie content of their food so why should we expect or believe they are capable of calculating units.

Importantly, unit information is only of use to the consumer if they can contextualise it. Knowing the units only helps if they also know what constitutes the sensible drinking levels – much the same way we have with calories. Knowing that a product has 100 calories is only of real worth if you also know that the recommended daily calorie intake is 2000 for women and 2500 for men. Of course people are free to ignore the information (and many people do) but it is available and people can, as a consequence, make an informed choice about their consumption.

Labelling about unit content is patchy at best and often does not contain the contextual information about recommended daily amounts which makes the unit content valuable to consumers. There is clear disparity between the efforts that drinks producers and retailers put in to promoting their products compared to their efforts to inform consumers about what they are drinking. The drinks industry spends in excess of £200m a year on advertising and

promotions whereas only £2.5m is spent promoting sensible drinking campaigns³. The drinks industry has failed to adequately fund its own awareness organisation, the Drinkaware Trust, with a funding shortfall of 40%⁴.

The background to alcohol labelling

The legislation that governs what needs to be on labels of alcohol products is complex and varies according to the product – for example there are differences between what must be on beer labels and on wine labels. For wine there are many variables which determine what goes on a label: whether the product is still or sparkling and whether the product originates from an EU or non-EU country⁵.

The Food Standards Agency⁶ states that a standard still wine label from an EU source must have within one field of vision on the bottle or label the following:

- A recognised description – which refers to the type of wine it is
- Country of origin
- Bottler's details, name address and member state
- The nominal volume
- The actual alcoholic strength

In addition a lot number and allergen information must be contained but this need not be in the same field of vision. The nominal volume must be at least 4mm high and the alcoholic strength at least 3mm high.

According to a guide produced by Brewing Research International and the British Beer and Pub Association⁷ the following must be shown on a beer label:

- A product name or description
- Details of maker, packer or seller - name address and member state
- Country of origin
- The volume
- Alcoholic content
- Date marking

Beer and wine is exempt from having to list its ingredients and there is no need to include nutritional information, unless the product makes an explicit health claim – such as low calorie beer.

It is not compulsory to state the unit content on any alcoholic drink, it is not necessary to carry a sensible drinking message and it is not necessary to display a health warning⁸.

Alcoholic units

Implementation of the agreement between the Government and the alcohol industry [on labelling] has been independently monitored. The findings of this report are disappointing: only 57% of products contained information on alcohol unit content (10 years after the alcohol industry first agreed to provide this) and only 3% contained the labelling scheme information in its entirety⁹.

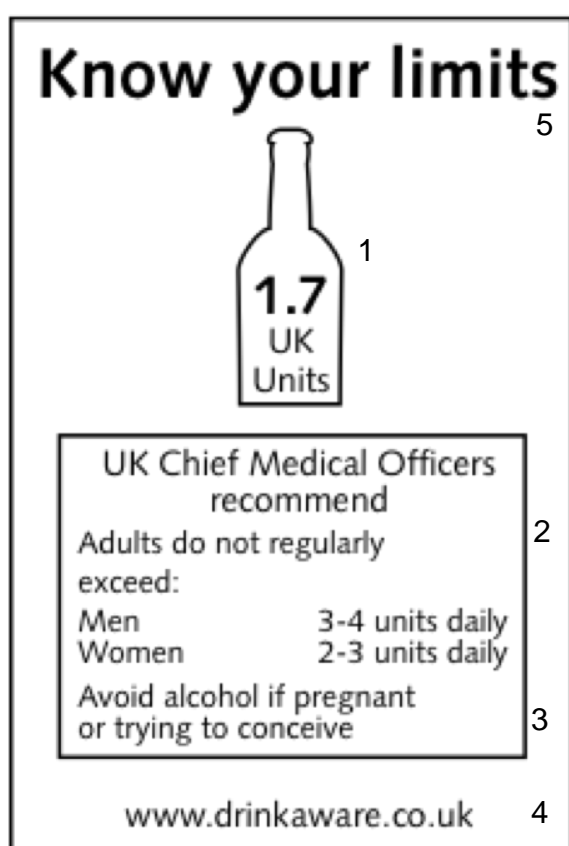
Carrying unit content on alcoholic beverages is not a new idea - the government first introduced the concept of alcoholic units in 1987¹⁰. In 1998 there was a voluntary agreement between the government and the drinks industry that they would improve labelling and include unit content on alcoholic products. In May 2007 the government reached a further

voluntary agreement to include unit content and government guidelines on sensible drinking on the majority of products by the end of 2008¹¹.

The government agreed to support labelling by launching a major public awareness campaign to educate the public about units. The Know Your Limits campaign was launched in May 2008 and sought to raise public knowledge about the dangers of regularly exceeding government recommended amounts.

A report was published in March 2008 looking at the progress of alcohol labelling since the initial agreement with the industry in 1998. The results showed that only 57% of products showed unit information¹². A further government survey is being conducted in 2009 with the results due to be published in July.

In addition to unit information and guideline daily amounts there are other messages that the government is keen to include on alcohol labels.



The image on the left is an example of an ideal label which the government would like to see on all alcoholic products. There are five key elements to this label:

1. Clear information about the unit content of the product
2. Sensible drinking limits as recommended by the Chief Medical Officer (CMO)
3. The message to avoid alcohol if pregnant or trying to conceive
4. The Drinkaware website
5. The 'Know your limits' message

In the independent review of products only 3%¹³ had all five elements that comprised an ideal label.

Units and public perception

It is clear that the public has a growing awareness that units are used as a way of calculating alcoholic content within drinks. The latest Office for National Statistics (ONS) data¹⁴ shows that 86% of the drinking population knew that alcoholic consumption could be measured in units. This knowledge varies across demographics: men are more likely to know about units than women, younger people than older people, occupational type with those in managerial positions having greater awareness than those in manual jobs.

However, despite this increased knowledge about units there is still limited knowledge about sensible drinking levels (SDL) and actual unit content of various drinks. As mentioned above having some awareness and understanding of units is only of value if it can be

contextualised in relation to what is a sensible number of units to consume. Here knowledge is much weaker.

70% of people have heard about SDL. However, of those 70% two-fifths have no knowledge about what the SDL might be and a further 12% had the wrong information about SDL for men and 8% the wrong information about women. This means that 62% of people do not know what the SDL is for men and 57% do not know what the SDL for women is.

In addition to needing to know what the SDL is consumers need to know how many units there are in the products they consume. Knowledge in this area has improved over recent years but still remains relatively low. Below is the percentage of people that knew the correct units for the specified drinks:

Beer (half pint)	60%
Wine (small glass)	68%
Fortified wine (small glass)	58%
Spirits (one measure)	66% ¹⁵

This means that more than a third of people do not know how many units they are drinking or are underestimating their consumption. This is further confused by two important things. Alcohol is not served in standard measures at uniform strengths, and consumption of alcohol at home does not use measures at all.

In many pubs and bars the smallest wine glass available is a 175ml glass which, of course, is larger than a small glass and hence the unit content varies. Measures of spirit are sold as 25ml or 35ml and doubles are often sold as standard. Further, the strength of wine and beer varies across products and so having a clear idea about how many units are actually in the beverage you are drinking is very hard to gauge.

Those that drink at home are unlikely to use standard measures at all and so knowledge of standard unit content in standard measures is of little value. This can be demonstrated by awareness of the unit content in a standard 275ml alcopop (normally 1.5 units). Only 14% of people surveyed by the ONS¹⁶ correctly assumed that an alcopop had more than one unit. This of course reflects some common misperceptions about alcopops as well the difficulties of understanding units in prepackaged drinks. There is no existing data around awareness of unit content of cans of beer, bottles of cider, bottles of wine or similar.

Measuring alcohol in terms of units is not a problem, people are aware of their existence. What is a problem is that people have insufficient information about how many units are in the products they are consuming and understanding how that relates to sensible drinking levels.

Labelling of products on promotion in supermarkets

Alcohol Concern undertook an exercise to look at alcohol labels, in-store information and promotions in five major supermarkets: Asda, Morrisons, Sainsbury's, Tesco and Waitrose.

We wanted to investigate how alcohol is currently promoted in major retailers; what information was available to consumers either through labels or aisle displays and the extent to which supermarkets were complying with their own corporate social responsibility policies around alcohol labelling.

Supermarkets are the largest off-licences in the country. Their substantial purchasing power means that they are often able to offer alcohol at heavily discounted rates. It is recognised that alcohol promotions can increase footfall to stores and they are therefore often used as

loss-leaders to entice consumers in to purchase alcohol at discounted rates in the hope that they will buy other products in the store.

Alcohol Concern visited branches of five major supermarkets in North London on 30 May 2009.

The purpose of this exercise was to look at how supermarkets promote alcohol and the extent to which this was accompanied by information about unit content or sensible drinking levels. We looked for this information both on the labels of the products promoted and in the aisles or posters accompanying promotions. Promotions were selected on the basis of those that had the greatest prominence within the shop; either at the store entrance, at the end of aisles or that had been highlighted significantly by posters or advertising. This method cannot be judged to be entirely thorough or representative of all supermarkets for that particular chain. However, it did provide a snapshot of promotions as a consumer would experience it and there is nothing to suggest that other stores of the same company are substantially different.

Each product on promotion was examined for compliance against the five desired components the government would like to see on labels. The type of promotion was noted, as well as the price of the product. In addition we looked for supplementary health or nutritional information, provided by the supermarket, which would enable consumers of promoted products to be fully informed of the health consequences of alcohol consumption.

We also looked at the labels of supermarkets' own brand alcohol products. Supermarkets have more control of their own labels and we wanted to see if there was a discrepancy between promoted product labels and own brand products.

Sainsbury's

Extract from Sainsbury's corporate social responsibility statement:¹⁷

"We want our customers to be able to make informed choices about the alcohol they consume by providing clear labelling on the amount of units contained in all our own brand beers, wines and spirits.

In 2007 we were the first supermarket to adopt the Department of Health's alcohol labelling guidelines. We now display information on recommended maximum daily intake as well as the number of units per glass and bottle contained in the product. Our labelling also refers customers to the Drinkaware Trust website for further information and advises customers to seek medical advice regarding the consumption of alcohol and pregnancy."

Of the 10 promoted products sampled none had all five components that make up the ideal label. Seven products did not have any of the five elements on their labels. Only three products displayed the unit content of the drink and only one the SDL. Surprisingly, and worryingly, only one of the products sampled had advice about not drinking when pregnant.

Most of the sampled products on promotion at Sainsbury's were taken from the end of aisle displays with the exception of the Stella Artois 18 x 284ml promotion which was at the store entrance. Most of the prominently promoted products were wines.

In addition to the 10 products in the table below the top 10 wines of the week were also accessed. None had unit or SDL information.

There was some small aisle display information but this was restricted to notices which indicated that the store was operating a Challenge 21 scheme. The bottom of these notices displayed the Drinkaware website. There was no additional information about normal unit content of standard alcoholic drinks or information about what constituted sensible drinking.

Alcohol on promotion

	Product ¹⁸	Price	Promotion	Unit information	Guideline drinking level	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Stella Artois 18 x 284ml bottles	£10	2 for £16	Y	N	N	N	Y	2
2	Carta Roja Monastrell Gran Reserva 2001	£4.99	1/2 price	N	N	N	N	N	0
3	Shelter Bay Marlborough Sauvignon Blanc 2008	£4.99	1/2 price	N	N	N	N	N	0
4	First Cape Chardonnay 2008	£3.99	1/2 price	N	N	N	N	N	0
5	First Cape Cabernet Sauvignon	£3.99	1/2 price	N	N	N	N	N	0
6	Grace Falls Zinfandel Rose 2008	£4.99	1/2 price	Y	Y	N	Y	Y	4
7	Canti Merlot 2008	£4.39	3 for £10	N	N	N	N	N	0
8	Champagne Charles Lafitte	£3.99	1/2 price	N	N	N	N	N	0

9	Heritage Road Merlot	£4.49	1/2 price	N	N	N	N	N	0
10	Bombardier Premium Bitter	£1.58	2 for £3	Y	N	Y	N	Y	3

Sainsbury's own brand products

	Product	Price	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Basics Lager	91p	Y	Y	Y	Y	Y	5
2	Crown Lager	£2.29	Y	Y	Y	Y	Y	5
3	Basics Cider	£1.21	Y	Y	Y	Y	Y	5
4	Strong Cider	£2.78	Y	Y	Y	Y	Y	5
5	Dry London Gin	£7.99	Y	N	N	N	Y	2
6	Sauvignon Blanc	£3.99	Y	Y	Y	Y	Y	5
7	Scotch Whisky	£21.49	Y	Y	Y	Y	Y	5
8	Superior White Rum	£11.19	Y	Y	Y	Y	Y	5
9	Vodka	£16.19	Y	Y	Y	Y	Y	5

Verdict

Products on promotion which had unit information	3/10
Products on promotion with SDL information	1/10
Products on promotion with all elements of a good label	0/10

Percentage of own brand products with unit information	100%
Percentage of own brand products with SDL information	88%
Percentage of products with all elements of a good label	88%

The products Sainsbury's heavily promoted were poorly labelled. Their own brand products fared much better and were the best out of all the supermarkets we looked at.

Tesco

Extract from Tesco's corporate responsibility statement:¹⁹

"Excessive alcohol consumption can be the cause of long-term health risks. We take a responsible approach to selling alcohol. The overwhelming majority of people who buy alcohol from our stores drink responsibly. But for a small minority this may not always be the case..."

- *Improved bottle labelling: We were the first supermarket to introduce labels showing the units of alcohol in our own-brand alcohol and we are now rolling out the recommended Department of Health alcohol labelling on all our own-brand packs, showing the unit measurements, the recommended maximum daily intake and health messages.*
- *More customer information in stores:*

We have been working in partnership with Diageo over the last two years to provide customer information through point-of-sale material, shelf-edge labels and on Tesco TV."

Cases of beer were on promotion and were being sold at £7. There was real disparity in the quality of the labels. Carling, for example, had four out of the five key messages, including unit information and SDL whereas Budweiser had no information on their labels whatsoever. Promotional posters for beer all displayed the Drinkaware website at the bottom.

A number of the labels also contained the wording 'please drink responsibly' or 'enjoy responsibly' but there was no indication of what this actually meant in relation to the product itself.

Our visit coincided with the Tesco wine festival so the sale of alcohol was heavily promoted both outside the store and immediately upon entering the shop. There were posters from the car park highlighting the wine festival; there were posters across the security detectors and a large display of wine as soon as you entered. Promotions on offer varied from half-price through to three for £10. In addition to these discounts a further 5% discount was available to those that bought six bottles of wine or more. This promotion was displayed prominently along aisles where alcohol was being sold. Worryingly, wine was being displayed at the check-out in the same way in which confectionery is often displayed, tempting people with those last-minute impulse purchases.

There was no additional signage to indicate that excessive alcohol consumption could harm someone's health. Nor was there any acknowledgement or display of the sensible drinking levels.

Alcohol on promotion

	Product	Price	Promotion	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Marques de Carano Gran Reserva 2001	£4.99	1/2 price	Y	Y	Y	N	Y	4
2	Italy Ogio Pinot Grigio 2008	£4.49	1/2 price	Y	Y	Y	N	Y	4
3	Inycon Estate Chardonnay Viognier	£4.49	1/2 price	N	N	N	N	N	0
4	La Tour de Marrenon Cotes du Luberon 2008	£3.99	1/2 price	N	N	Y	N	Y	2
5	Stella Artois 18 x 284ml bottles	£7	£7 case promotion	Y	N	N	N	Y	2
6	Carling 15 x 440ml cans	£7	£7 case promotion	Y	Y	Y	N	Y	4
7	Budweiser 15 x 300ml bottles	£7	£7 case promotion	N	N	N	N	N	0
8	Carlsberg 15 x 440ml cans	£7	£7 case promotion	Y	N	N	N	Y	2
9	Buenos Aires Shiraz Malbec 2008	£5.16	3 for £10	N	N	Y	N	N	1
10	The Big Kahuna Red	£4.99	3 for £10	N	N	N	N	N	0

Tesco own brand products

	Product	Price	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Value Lager	91p	Y	N	N	N	N	1
2	Biere D'or	£6.74	N	N	N	Y	N	1
3	Imperial Vodka	£7.98	Y	Y	Y	Y	Y	1
4	Value Vodka	£6.98	Y	Y	Y	Y	Y	5
5	Imported Lager	£2.29	Y	N	N	N	N	1
6	Chablis	£9.01	Y	Y	Y	Y	Y	5
7	Chardonnay	£6.00	Y	Y	Y	Y	Y	5
8	White Rum	£11.19	Y	Y	Y	Y	Y	5
9	Value Brandy	£7.28	Y	Y	Y	Y	Y	5
10	Scotch Whisky	£9.29	Y	Y	Y	Y	Y	5

Verdict

Products on promotion which had unit information	5/10
Products on promotion with SDL information	3/10
Products on promotion with all elements of a good label	0/10

Percentage of own brand products with unit information	90%
Percentage of own brand products with SDL information	70%
Percentage of products with all elements of a good label	60%

Promoted products at Tesco had, on the whole, better labels than at Sainsbury's. However, their own brand products fared less well and were marked by a real inconsistency.

Morrisons

Extract from Morrisons' submission to the Health Select Committee on Alcohol:²⁰

"Morrisons approach to retailing alcohol is to enable our customers to make responsible choices. We are clear to our customers that alcohol is a product for adults. Our priority is to ensure that our customers have the information they need to drink responsibly and that sales are only made to those over the age of 18."

Morrisons promoted a beverage that had all five components of the ideal label, John Smith Extra Smooth. In addition more of the products sampled had some elements of good labelling with only Marques de Monistrol Rosé Brut having nothing on its label. Eight out of the 10 products had unit information on the container but only three of those showed the SDL information. Five out of the 10 products had a pregnancy warning and seven out of 10 products carried the Drinkaware website. Only one product had no label information at all.

The aisle signage carried Challenge 25 information which also displayed the Drinkaware website. There was no additional information about sensible drinking or what the standard unit content of alcohol beverages might be.

All of Morrisons' promotional posters carried the Drinkaware website including the 'Price Crunch spirits for £12' poster which was at the shop entrance.

There is some further signage at Morrisons which is of concern. Many of the price labels along aisles have the image of a small glass with a number in it. This is used by Morrisons to indicate what type of wine the product is, sweet, dry etc. However, this same image, a glass with a number inside is used to show unit content on other products. Of course the number allocated by Morrisons for the type of wine has no relation to its strength but it could be confused as such and lead people to have a mistaken idea about unit content of products purchased.

Alcohol on promotion

	Product	Price	Promotion	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	High Tide Cabernet Sauvignon	£4.49	Better than ½ price	N	N	Y	N	N	1
2	Stella Artois 18 x 284ml bottles	£11	Only £11	Y	N	N	N	Y	2
3	Kronenburg 4 x 440ml cans	£4	Only £4	Y	N	N	N	Y	2
4	John Smith Extra Smooth 4 x 440ml cans	£3	Only £3	Y	Y	Y	Y	Y	5
5	Marques de Monistrol Rose Brut 2005	£5	Better than ½ price	N	N	N	N	N	0
6	Extra de Codorniu Brut	£4.99	Better than ½ price	Y	N	Y	N	N	2
7	Okiwi Bay Sauvignon Blanc	£4.99	Better than ½ price	Y	Y	N	Y	Y	4
8	Carlsberg 12 x 440ml	£6	Only £6	Y	N	N	N	Y	2
9	Lambrini Sparkling Perry (150cl)	£2.96	2 for £5	Y	Y	Y	N	Y	4
10	Stamp Hardys Semillion Chardonnay	£4.99	Better than ½ price	Y	N	Y	N	Y	3

Morrisons' own brand products

	Product	Price	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Vodka (1 litre)	£11.21	Y	N	N	N	N	1
2	Scotch Whisky (1 litre)	£10.91	Y	N	N	Y	N	1
3	Dry Cider (3 litres)	£3	Y	N	N	N	N	1
4	White Cider (3 litres)	£3.77	Y	N	N	N	N	1

5	Lager	£2.29	N	N	N	N	N	0
6	Bitter	£2.15	Y	N	N	N	N	1
7	Organic Golden Ale	£1.59	Y	N	N	N	N	1
8	The Best Claret Bordeaux	£5.99	Y	N	N	N	N	1
9	The Best Chablis	£8.99	Y	N	N	N	N	1
10	The Best Bottled Ale	£1.68	Y	N	N	N	N	1

Verdict

Products on promotion which had unit information 8/10
 Products on promotion with SDL information 3/10
 Products on promotion with all elements of a good label 1/10

Percentage of own brand products with unit information 90%
 Percentage of own brand products with SDL information 0%
 Percentage of products with all elements of a good label 0%

Promoted products at Morrisons had reasonably good labels (compared to other supermarkets) but their own brand products carried no SDL information. In addition their own signage on aisles, showing a glass with a number inside, could be very confusing for consumers.

Asda

Extract from Asda's corporate social responsibility statement: ²¹

"With the problem of alcohol related violence and illness in the UK increasing we see it as part of our role to help our customers and colleagues enjoy alcohol responsibly.

Rather than calling for the Government to legislate, or raising prices across the board — which would punish the majority of our customers who drink sensibly — we are implementing a series of measures to monitor the products we sell and when we sell them.

These measures are aimed at tackling both underage drinking (see below) and the effects that late night alcohol-related crime and anti-social behaviour have on the local communities where we live and work.

According to recent statistics, nearly half of all violent crimes take place at the weekend—with the majority occurring between midnight and six in the morning. That's why we no longer sell alcohol after midnight in town centre stores; a move which we hope will prevent people leaving bars and clubs from purchasing more alcohol on their way home, and so help reduce the problem."

The samples of promoted products at Asda included one product that had all five key elements of an ideal label, Bulmers Light. Six of the products had unit information on them. However, of those only one had the SDL information. More products had pregnancy advice with seven beverages giving either the wording or the image that drinking should be avoided when pregnant; in fact for two products it was the only health information they displayed.

Asda had no alcohol advertising or displays at the front of the store, the only supermarket not to do so in one form or another. There were some aisle displays which mentioned the Challenge 25 scheme but there was no display of the Drinkaware website on these notices

unlike the practice of some other supermarkets. There was no display of any additional unit or health information.

Asda did have a number of promotions which quite clearly incentivised bulk purchasing with some products promoted in such a way that it would never make sense to buy two bottles of a particular wine. For example Lindemans Merlot 2007 costs £6.98 a bottle or you can buy three for £10. This means that it only makes sense to buy one or three bottles. Buying two bottles is disincentivised as it would cost the consumer £13.96 whereas three bottles would be cheaper, namely £10.

Alcohol on promotion

	Product	Price	Promotion	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Cobra Beer 6 x 330ml	£5	6 for £5	Y	N	Y	N	Y	3
2	Snappygum Red Wine	£3.90	3 for £10	N	N	Y	N	Y	2
3	First Cape Rose	£3.78	3 for £10	N	N	N	N	N	0
4	Canti Merlot Sangiovese	£5.27	3 for £10	N	N	Y	N	N	1
5	Antones/Antares Sauvignon Blanc 2008	£5.12	3 for £10	N	N	Y	N	N	1
6	Blossom Hill Grenache 2007	£4.88	3 for £10	Y	N	Y	N	N	2
7	Lindemans Merlot 2007	£6.98	3 for £10	Y	N	Y	N	N	2
8	Bulmers Light	£1.78	3 for £4	Y	Y	Y	Y	Y	5
9	Kingfisher Premium Lager 4 x 330ml	£3.48	2 for £6	Y	N	N	N	N	1
10	Sol Beer 4 x 330ml	£3.38	2 for £6	Y	N	N	N	N	1

Asda own brand products

	Product	Price	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Smart Price Cider (2 litres)	£1.21	Y*	Y	Y	N	Y	4
2	Smart Price Bitter	94p	Y	Y	Y	N	Y	4
3	Smart Price Vodka	£6.98	Y*	N	N	N	Y	2
4	Smart Price Lager	93p	Y	Y	N	N	Y	3
5	Extra Pilsner	£3.08	Y	Y	N	N	Y	3
6	Premium Strong Dry Cider (3 litres)	£2.78	Y	N	N	N	Y	2
7	Vodka	£7.98	Y*	N	N	N	Y	2
8	Scotch	£10.18	Y*	N	N	N	N	0

9	Chablis	£8.98	Y	Y	Y	N	Y	4
10	Hock	£2.72	Y	N	N	N	N	1

Verdict

Products on promotion which had unit information 6/10
 Products on promotion with SDL information 1/10
 Products on promotion with all elements of a good label 1/10

Percentage of own brand products with unit information 100%*
 Percentage of own brand products with SDL information 50%
 Percentage of products with all elements of a good label 0%

Asda's promoted products were reasonably well-labelled but only one of the six products with unit information also had the SDL information. The labels on their own brand products varied extensively and the unit information on them was often unhelpful.

*Asda own brand products have labels which either showed the unit content of the whole product or the unit content of one standard measure of that product. We would argue that standard measure unit information should always be accompanied by how many units are within a particular product i.e. that a bottle of wine has nine units as opposed to just a 125ml measure of a wine having 1.5 units.

Waitrose

Extract from Waitrose's Corporate Social Responsibility Statement:²²

"Waitrose is committed to highlighting the sensible drinking message to both our customers and staff. It is our aim to promote the responsible sale and consumption of alcohol."

The products assessed in Waitrose were disappointing as there were no labels that had more than three elements of an ideal label. The highest score was three, each having unit information, pregnancy advice and the Drinkaware website. Six containers had unit information but only one of them also carried the SDL information. Four products had no information on them at all.

Waitrose had a 'pop-up' banner at the store entrance highlighting their 'Wine Showcase'. The Wine Showcase involved moving wine from the normal 'off-license' area of the shop to a separate aisle which was closer to the check-out and near the barbeque products.

There was no additional aisle display information. There was nothing in relation to Challenge 21 or 25 and there was no information about sensible drinking levels or about standard unit content of alcoholic drinks.

Alcohol on promotion

	Product	Price	Promotion	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	San Colombano Chianti Reserva	£5.99	save £4	N	N	N	N	N	0
2	Storie Vite Pinot Grigio	£3.99	save £3	N	N	N	N	N	0
3	Rosado Marques de Calatrava Tempranillo	£4.99	25% off	N	N	N	N	N	0
4	Club Privado	£5.99	25% off	N	N	N	N	N	0
5	La Chasse du Pape Shiraz	£4.49	25% off	Y	Y	N	N	Y	2
6	Mont Tauch Fitou Carignan Grenache Syrah	£4.49	25% off	Y	N	N	N	N	1
7	Plymouth English Gin	£16.49	save £4	Y	N	N	N	N	1
8	Bell's Original	£14.79	save £3.70	Y	N	N	N	N	1
9	Absolut Vodka	£11.99	save £3	Y	N	Y	N	Y	3
10	Jacob's Creek Shiraz Cabernet 2006	£4.79	20% off	Y	N	Y	N	Y	3

Waitrose own brand products

	Product	Price	Unit information	Guideline drinking levels	Pregnancy advice	Know your limits	Drinkaware website	Score
1	Waitrose Vega Ariana Rioja 70cl	£4.99	Y	N	Y	Y	Y	4
2	Waitrose Cava	£7.98	Y	N	N	N	N	1
3	Waitrose Sauvignon Blanc 70cl	£8.40	Y	N	Y	Y	Y	4
4	Waitrose Vodka 1ltr	£11.99	Y	N	N	N	N	1
5	Waitrose London Dry Original Gin	£14.49	Y	N	N	N	N	1
6	Waitrose London Dry Gin	£11.99	Y	N	N	N	N	1

Verdict

Products on promotion which had unit information 6/10
 Products on promotion with SDL information 1/10
 Products on promotion with all elements of a good label 0/10

Percentage of own brand products with unit information 100%
 Percentage of own brand products with SDL information 0%

Percentage of products with all elements of a good label 0%

Promoted products at Waitrose had disappointing labels, with only one of the products displaying unit information and SDL information. Own brand products all had unit labelling but none had the SDL information and there were inconsistencies across their range.

A summary of our findings

This snapshot produced disappointing results - with supermarkets keen to promote alcohol but labels on promoted products failing to inform the public about potential health hazards.

- 28 out of the 50 promoted products we looked at had unit information on the labels (56%)
- Only nine (18%) promoted products displayed sensible drinking levels on the labels
- Two promoted products out of 50 (4%) had all five elements suggested by the Department of Health
- 20 promoted products (40%) carried either a message or symbol warning against drinking whilst pregnant
- 95% of supermarket own brand products had unit labelling
- 44% of supermarket own brand products displayed sensible drinking levels
- 42% of own brand products had warnings about drinking whilst pregnant

These worrying numbers showed that there is a clear disparity between supermarket own brand products and those that they often promote. There is a clear awareness that labelling is important and part of being a responsible retailer but supermarkets can and must do more.

Conclusion and recommendations

Supermarkets are legally allowed to promote alcohol and all the supermarkets surveyed did so with enthusiasm. These promotions are enjoyed by members of the public but there is insufficient information about the potential health consequences of excessive consumption.

There are some important principles that supermarkets should be thinking about if they are to become responsible retailers of alcohol. Promotion of alcohol must be accompanied by proportionate information about the health consequences of consumption above the recommended daily maximum amounts. People need more information in order to make healthy choices about their consumption and currently producers and retailers are failing in their responsibility to give information to the public. The normalisation of alcohol consumption, especially wine drinking, must be accompanied with information about how easy it is to drink at levels which could harm your health. We know that the public would like more information about what they are drinking. A recent Alcohol Concern survey²³ found that 94.3% of 1,066 respondents agreed that prominent information about the total unit per drink of alcohol should be displayed wherever alcohol is sold.

The lack of information and the slow progress made since the voluntary agreement between government and the drinks industry in 1998 indicates that retailers and producers have limited interest in providing information to consumers and one can only guess that they are placing profit ahead of public health.

There are some protective factors associated with drinking – but these levels are very low. Drinking as little as three units a day places you at greater risk of mouth, food pipe, bowel, and breast cancer.²⁴ In the light of historically high levels of alcohol consumption it is imperative that the public has a clear idea about the health risks associated with drinking. Public knowledge and awareness about the health impact of drinking is low and yet our understanding of the epidemiology of alcohol-related diseases is very high. If we want people to be able to make responsible and healthy choices about their consumption we must provide them with the information they need to be able to do that.

Current labelling is counter intuitive, falls short of government's expectations and does not sufficiently protect public health. Supermarkets are contributing to an epidemic of heavy drinking by promoting cheap alcohol that is poorly labelled. Many of the supermarkets' corporate social responsibility statements (where they exist with regards to alcohol) are totally at odds with their actual practice.

Recommendation 1

All pre-packaged alcoholic beverages should be required, by law, to display its unit content. This information must be accompanied with information about sensible drinking levels for men and women as set out by the Chief Medical Officer. This information must be within the same field of vision, the numbers must be at least 3mm high and must be horizontal to the level of the product so that it can be easily read by consumers. This new standard must be mandated by the Food Standards Agency as the current voluntary agreement between the drinks industry and the government has been ineffective.

Recommendation 2

All pre-packaged alcoholic products should include space for a government defined health warning. These messages would be similar to those on cigarette packages. Messages might include statements such as: "Drinking above sensible limits puts you at risk of throat, mouth and larynx cancer". These messages would have to be determined by the Department of Health and would have to have a specified size and place on alcoholic products. Industry

defined messages are insufficient. The phrase 'Please drink responsibly' is too general; offering no information about what responsible drinking actually is.

Recommendation 3

As responsible retailers supermarkets should not promote alcoholic products which do not have clear unit labelling; information about sensible drinking levels and a warning about drinking whilst pregnant or trying to conceive.

Recommendation 4

Off-licenses, including supermarkets, should display information about what sensible drinking levels are and the health consequences of drinking to excess at any point where alcohol is displayed or for sale. This should be brought in through a Mandatory Code on Alcohol Sales, which the Home Office is currently consulting on.

Recommendation 5

Producers and retailers of alcohol should never use a bottle or glass symbol with a number inside it for any other purpose than to show unit content of a product. This principle should extend across all alcohol products, especially on labels and at point-of-sale. These symbols are frequently used to display unit information and to use this iconography for any other purpose is misleading and could confuse consumers. This should form part of the Food Standards Agency labelling regulations and its implementation overseen by Trading Standards.

Recommendation 6

Supermarkets should sign up to a 'Supermarkets Charter on The Sensible Sale and Promotion of Alcohol'. Our visits showed that practice varied hugely between different supermarkets and more effort must be made to ensure retailers are responsible in the way they sell alcohol. This charter could include such things as:

- An end to alcohol loss-leading
- Not promoting alcohol at the entrance of supermarkets
- Not promoting alcohol at till points
- Ensuring that promotions on alcohol are accompanied with appropriate health information

Alcohol Concern will work with the industry, if they are willing to engage in the debate, to help draw up a charter which is both workable, sensible and does not contravene competition rules. If supermarkets are unwilling to amend their practice government should use existing powers to mandate against irresponsible practice.

Recommendation 7

The government should look again at introducing a minimum price on alcohol as recommended by the Chief Medical Officer and as proposed by the Scottish Government. A minimum price of 50p per unit would eliminate some of the most irresponsible promotions as well as having a significant impact in reducing alcohol-related hospital admissions, crime and work absenteeism.

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- ⁴ Ibid
- ⁵ The Food Standards Agency (2006) *A guide to wine law*, available at: <http://www.food.gov.uk/enforcement/sectorrules/winestandards/lawguide>
- ⁶ The Wine Standards Board (2005) *EU Wine Regulations – Still Wine – Compulsory Particulars*, available at: <http://www.food.gov.uk/multimedia/pdfs/eustillwineregs.pdf>
- ⁷ British Beer and Pub Association & Brewing Research International <http://www.brewingresearch.co.uk/label/labelguide.htm> [accessed at 20 July 2009]
- ⁸ Ibid
- ⁹ Department of Health (2008) *Safe, Sensible, Social – consultation on further action*, London, DH, p.16
- ¹⁰ Department of Health (1995) *Sensible Drinking, The report of a Inter-Departmental Working Group*, London, DH, p. 45
- ¹¹ Op.cit. Department of Health (2008) p.15
- ¹² Ibid, p.16
- ¹³ Ibid, p.16
- ¹⁴ Office for National Statistics (2009) *Drinking: adults' behaviour and knowledge in 2008*, Newport, ONS, p.45
- ¹⁵ Ibid p.53-7
- ¹⁶ Ibid p.57
- ¹⁷ J Sainsbury PLC *The responsible sale of products*, available at: <http://www.j-sainsbury.com/cr/index.asp?pageid=30> [accessed 22 July 2009]
- ¹⁸ Alcohol Concern has tried to note down the names of the products as accurately as possible however, the full and correct names of the products surveyed cannot be guaranteed. The labels of the products we looked at often had highly designed and stylised writing making it at times difficult to decipher the exact brand names of the product.

¹⁹ Tesco PLC (2009) *Corporate Responsibility Report*, Chesnut, Tesco plc, p.37

²⁰ Wm Morrison Supermarkets plc (2009) *Memorandum by Wm Morrison Supermarkets plc to Health Select Committee*, available at:
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Message On a Bottle -

Does the public have enough information about what they are drinking?

