



The Association of Directors of Public Health Consultation Response

Updating labelling guidance for no and low- alcohol alternatives

Objectives and Scope

The Office for Health Improvement and Disparities (OHID) is consulting on options for updating guidance on low-alcohol descriptors. Their aim is to increase substitution of alcoholic drinks with alcohol free or low-alcohol alternatives (NoLos) among people who drink above low risk levels.

About ADPH

ADPH is the representative body for Directors of Public Health (DsPH), and is a collaborative organisation, working in partnership with others to strengthen the voice for public health, with a heritage which dates back over 160 years. ADPH works closely with a range of Government departments, including UKHSA and OHID as well as the four CMOs, NHS, devolved administrations, local authorities (LAs) and national organisations across all sectors to minimise the use of resources as well as maximise our voice.

ADPH aims to improve and protect the health of the population by:

- Representing the views of DsPH on public health policy.
- Advising on public health policy and legislation at a local, regional, national and international level.
- Providing a support network for DsPH to share ideas and good practice.
- Identifying and providing professional development opportunities for DsPH.

Response to questions

Low alcohol descriptors

Q1: 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? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

No.

We are deeply concerned that if the 'alcohol free' descriptor is redefined without sufficient evidence base, it will present potential risks to population health, especially pregnant women's health.

According to the equality impact assessment of the consultation, there is currently no published research that examines potential risks of alcohol harm for products with 0.5% ABV on healthy adults.¹

According to the WHO, [no level of alcohol consumption is safe for our health](#).² In particular, there is no proven safe amount of alcohol a woman can drink during pregnancy. According to OHID's evidence review on ['Potential health impacts of changing the alcohol free descriptor'](#),³ no research was identified which examined whether 0.5% ABV products are safe to consume during pregnancy. Alcohol in the mother's blood passes to the baby and can seriously affect the baby's physical, behavioural, and intellectual development. We therefore strongly urge the Government to retain the original definition.

The proposed new definition of 'alcohol free' is also unclear. According to [Defra's research](#) and the [Alcohol Change UK's report](#), consumers generally expect the term 'alcohol free' to mean the absence of alcohol.⁴

⁵ The redefinition of 'alcohol free' present risk for people who want to avoid alcohol completely, for example for health or religious reasons or in pregnancy.

Therefore, the 'alcohol free' descriptor should not be redefined without a clear evidence base.

Q2: 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)? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

No.

According to the WHO, while there is an expanding market of NoLos, 'their effects on global ethanol consumption and public health are still questioned. Policies and regulations about NoLos' availability, acceptability and affordability are lacking and evidence about their benefits is limited.'⁶

While there is a weak evidence base in promoting NoLos, more research should be done before promoting NoLos by redefining the 'alcohol free' descriptor. In addition, there are worries that NoLos will increase the acceptability of alcohol products and normalise their consumption which can lead to increased amount

and early onset of teenage alcohol use.⁷ OHID's rapid review has also found that NoLos have been associated with increasing cravings to drink alcohol in those with alcohol use disorders. It may cause those recovering from alcohol addiction to suffer from relapse.⁸

'Alcohol free' products should retain their original definition and should apply only to drinks that contain no more than 0.05% ABV. This category should remain distinct from the term 'non-alcoholic' to prevent the public from mistaking an alcohol substitute drink as a non-alcoholic drink (eg soft drink). The UK should follow the example of Norway and ban the marketing of NoLos which uses the same brand as alcoholic products.

Q3: Do you think the term 'de-alcoholised' should be removed as a description of a product's alcoholic strength? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

No.

We believe that the 'alcohol free' descriptor should not be redefined to describe drinks with no more than 0.05% ABV, as it is misleading and it may present risk for people who want to avoid alcohol completely, for example for health or religious reasons or in pregnancy. Therefore, there is no need for the term 'de-alcoholised' to be removed.

In addition, according to research from Alcohol Change UK, 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.⁹ 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. Therefore, the term 'de-alcoholised' should not be removed.

Q4: 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? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

Yes.

According to research from Alcohol Change UK, 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.¹⁰ 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. Therefore, the term 'de-alcoholised' should not be removed.

Q5: Do you think the term 'non-alcoholic' should be recommended for use with a name commonly associated with an alcoholic drink? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

No.

We believe the original definition of 'non-alcoholic' should be retained and the term should not be used with a name commonly associated with an alcoholic drink. This can ensure that the alcohol industry cannot promote their brand using non-alcoholic products.

There have been examples (eg in Ireland) where NoLos are used directly or indirectly to promote alcohol products, including their trademarks, emblems, marketing images and logos. NoLos especially increase the acceptability of alcohol products and normalise their consumption which can lead to increased amount and early onset of teenage alcohol use.¹¹ This goes against the spirit of our laws to protect us from ubiquitous alcohol marketing. The UK should follow the example of Norway and ban the marketing of NoLos which uses the same brand as alcoholic products. Non-alcoholic beverages must have their own distinct branding, different from the parent brand.

Alcohol by Volume (ABV) content

Q6: 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? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

Yes.

No matter what descriptor is used, it is important to display the ABV content on the front of the label, as consumers have the right to know and to be informed about the alcohol content of the drinks they purchase. This can also encourage the public to think twice before buying and consuming alcohol products, even if the alcohol content of those products is low.

Q7: 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? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

Yes.

No matter what descriptor is used, it is important to display the ABV content on the front of the label, as consumers have the right to know and to be informed about the alcohol content of the drinks they

purchase. This can also encourage the public to think twice before buying and consuming alcohol products, even if the alcohol content of those products is low.

Q8: 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? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

Yes.

No matter what descriptor is used, it is important to display the ABV content on the front of the label, as consumers have the right to know and to be informed about the alcohol content of the drinks they purchase. This can also encourage the public to think twice before buying and consuming alcohol products, even if the alcohol content of those products is low.

Legal status of low alcohol descriptors

Q9: Do you think the terms of use for low alcohol descriptors should be set in legislation? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

No.

We are deeply concerned that if the 'alcohol free' descriptor is redefined without sufficient evidence base, it will present potential risks to population health, especially pregnant women's health. Therefore, the terms of use for low alcohol descriptors should not be set in legislation before a clear evidence base is established.

According to the WHO, while there is an expanding market of NoLos, 'their effects on global ethanol consumption and public health are still questioned. Policies and regulations about NoLos' availability, acceptability and affordability are lacking and evidence about their benefits is limited.'¹²

According to the equality impact assessment of the consultation, there is currently no published research that examines potential risks of alcohol harm for products with 0.5% ABV on healthy adults.¹³ In particular, there is no proven safe amount of alcohol a woman can drink during pregnancy. According to OHID's evidence review on '[Potential health impacts of changing the alcohol free descriptor](#)',¹⁴ no research was identified which examined whether 0.5% ABV products are safe to consume during pregnancy. Alcohol in the mother's blood passes to the baby and can seriously affect the baby's physical, behavioural, and intellectual development.

Without a clear evidence base, the terms of use for low alcohol descriptors should not be set in legislation. NoLos should not be promoted as a national policy when there are well-established measures that work (eg treatment; minimum unit pricing; restrictions on marketing and availability).

Communicating UK chief medical officers' low risk drinking guidelines

Q10: Which, if any, of the CMOs' low risk drinking guidelines should be displayed on alcohol substitute drinks at or below 0.05% ABV? [Multiple choice – can select more than one]

- Weekly drinking guidelines
- Single occasion drinking guidelines
- Pregnancy and drinking

Q11: 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 ? [Multiple choice – can select more than one]

- Weekly drinking guidelines
- Single occasion drinking guidelines
- Pregnancy and drinking

Achieving Government public health policy aims

Q12: Do you think changes to the descriptors, if implemented, will help to deliver Government's policy aims for reducing alcohol related harms? [Multiple choice]

- Yes
- No
- Don't know

Please provide evidence to support your answer. (250 words)

No.

According to the WHO, there is limited evidence of NoLo's effect on global ethanol consumption and public health are still questioned.¹⁵ Research also shows that, younger adults and people on higher incomes are more likely to drink NoLos, however they are less likely to suffer from alcohol-related harms.¹⁶ This shows that the proposed measures may fail to target the most vulnerable groups.

NoLos may mislead minors, pregnant women, abstainers, or those seeking to stop drinking about their actual ethanol content.¹⁷ NoLos are also associated with increasing cravings to drink alcohol in those with alcohol use disorders.¹⁸ In addition, NoLos increase the acceptability of alcohol products and normalise their consumption which can lead to increased amount and early onset of teenage alcohol use.¹⁹

No level of alcohol consumption is safe for our health.²⁰ The promotion of NoLos maintains the narrative that individual choices are the problem. It shifts attention from dealing with harmful products and the way they are promoted. Without a clear evidence base, NoLos should not be promoted as a national policy.

The Government should implement a minimum price of 65p per unit of alcohol and follow the evidence base built in Scotland and Wales.²¹ The Government should reintroduce the tax escalator on alcohol at 2% per annum ahead of inflation. The Government should also increase investment in public health and introduce additional, long-term funding to tackle alcohol related harm.

Q13: If implemented, do you think changes to the descriptors would affect whether consumers substitute standard-strength alcohol products with NoLo products? [Multiple choice]

- Yes
- No
- Don't know

Please provide evidence to support your answer. (250 words)

No.

It is uncertain whether a change to the descriptors can achieve a general reduction in standard-strength alcohol use and harm at a population level. According to [research](#), NoLos will more likely attract younger adults and people on higher incomes, however they also consume alcohol less and are less likely to suffer from alcohol-related harms.²² Therefore, it is unclear whether the promotion of NoLos can achieve the desired goal to improve population health and reduce alcohol consumption and harm.

The promotion of NoLos can also lead to unintended consequences that can increase alcohol consumption and harm.

Changes to the descriptors and the promotion of NoLos can increase the acceptability of alcohol products and normalise their consumption even in contexts where alcohol is typically not consumed (such as the workplace and at the gym). This can lead to increased and early onset of standard-strength alcohol use.²³ There have been examples (eg in Ireland) where NoLos are used directly or indirectly to promote alcohol products, including their trademarks, emblems, marketing images and logos. This goes against the spirit of our laws to protect us, especially children and pregnant women, from ubiquitous alcohol marketing.

NoLos have also been associated with increasing cravings to drink alcohol in those with alcohol use disorders and can increase risk of relapse.²⁴ Therefore, the descriptors should not be changed before a clear evidence base is established.

Age restriction labelling

Q14: Do you think alcohol substitute drinks with a strength of 0.5% ABV or below should display an age restriction warning on label? [Multiple choice]

- Yes
- No
- Don't know

Please explain your answer. (250 words)

Yes.

Alcohol substitute drinks are not meant for children. Children and young people should be discouraged from consuming alcohol products, even if the product has a strength of 0.5% ABV or below.

The Government should forbid the sale of alcohol substitute drinks to children. An age restriction warning on labels for all NoLo products, including those at 0.5% ABV and below, should be in place to act as a reminder to children, their parents or guardians, and retailers that these products are not suitable for children under the age of 18.

Q15: 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? [Multiple choice]

- Yes – Government

- Yes – industry
- Yes – Government and industry
- No
- Don't know

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? (250 words)

Yes – Government should take action to prevent children and young people from accessing and consuming alcohol substitute drinks of 0.5% ABV or below.

We propose that the Government should forbid the sale of alcohol substitute drinks to children. The Government should also ban advertising of alcohol and alcohol substitute drinks where children are likely to be exposed to it. This could include putting an end to cinema, outdoor and bus advertising, introducing a TV watershed and restricting exposure online and alcohol sponsorship.

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

Q16: Do you think Government should do more to encourage consumers who drink above CMOs' low-risk guidelines to substitute standard-strength alcohol with NoLo products in order to reduce alcohol harms? [Multiple choice]

- Yes
- No
- Don't know

Please provide details. (250 words)

No.

As elaborated in previous question, the evidence base on NoLos is not clear. It is not clear whether NoLos can lead to a shift in drinking pattern across the whole population. There is also currently no published research that examines potential risks of alcohol harm for products with 0.5% ABV on healthy adults.²⁵ In addition, a lot of NoLos have high sugar content and should not be promoted.

OHID's rapid review has also found that NoLos have been associated with increasing cravings to drink alcohol in those with alcohol use disorders. It may cause those recovering from alcohol addiction to suffer from relapse. Therefore, before a clear evidence base is established, NoLos should not be promoted to consumers who drink above CMOs' low-risk guidelines.

Ultimately, the promotion of NoLos maintains the narrative that individual choices are the problem. It shifts attention from dealing with harmful products and the way they are promoted. Without a clear evidence base, we recommend that the Government should not make the promotion of NoLos a national policy and should instead focus on well-established measures that can reduce alcohol use and harm (eg treatment; taxation and minimum unit pricing to reduce the affordability of alcohol; restrictions on advertising, marketing and availability of alcohol products).

Q17: What outcomes do you think the Government should monitor to assess whether the policy objectives set out in this consultation are being met? (250 words)

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

Outcomes on whether the policy objectives are being met should include, but not be limited to:

- Changes in self-reported and recorded NoLo consumption / purchasing.
- Changes in household purchases from higher strength products to NoLo ones.
- Changes in purchase data in on-license settings.
- Total NoLo sales as a portion of the total alcohol sales market.
- Changes in total alcohol consumption amongst drinkers.
- Changes in alcohol-related mortality and morbidity.
- Changes in rates of access to alcohol treatment services.
- Awareness of harms from alcohol increasing.

Further evidence should also be collected around the public understanding of NoLo descriptors, and their influence on consumer habits.

All outcome research should also include analysis of the impact based on socioeconomic status, ethnicity, deprivation, sex, gender, and sexual orientation and other characteristics that could indicate whether the policy has been more impactful in some groups over others.

Monitoring impact and equalities

Q18: 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? (250 words)

While the consultation has set out a number of outcome measures on the sale and consumption of NoLos, it has failed to propose outcome measures on the unintended consequences of the proposals set out in the consultation.

No level of alcohol consumption is safe for our health.²⁶ NoLos are not meant for children, pregnant women, and those with alcohol use disorders. While we are hesitant about the policy proposals set out in the consultation as the evidence base is limited, if such policy should be implemented, it is crucial for the Government to evaluate the risks it presents to vulnerable groups.

In addition, it is crucial to evaluate the risk for the proposals to exacerbate existing health inequalities. According to studies, younger adults and people on higher incomes are more likely to drink NoLos, however they also consume alcohol less and are less likely to suffer from alcohol-related harms.²⁷ This shows that the proposed measures may potentially fail to target the most vulnerable groups.

If, at the end, it is found that the proposals set out in the consultation present risks to vulnerable groups and exacerbate existing health inequalities, the Government should stop the policy immediately to prevent further harm.

Q19: 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? (250 words)

The proposals set out in the consultation will disproportionately affect people in recovery from alcohol dependence. While in the equality impact assessment, it is argued that these individuals may pay attention to ABV content, however if NoLos are promoted and generally perceived as safe, then it will be more likely for them to consume NoLos which will increase the risk of relapse.²⁸

The proposals will also disproportionately affect pregnant women and some religious or racial groups who abstain from alcohol. Research by Defra found that consumers generally felt ‘alcohol free’ should mean absence of alcohol.²⁹ This shows that the proposed new definition of ‘alcohol free’ may potentially be misleading.

Children under the age of 18 are also affected by the proposal. NoLos increase the acceptability of alcohol products and normalise their consumption which can lead to increased amount and early onset of teenage alcohol use.³⁰ There have been examples (eg in Ireland) where NoLos are used directly or indirectly to promote alcohol products, including their trademarks, emblems, marketing images and logos. This goes against the spirit of our laws to protect us from ubiquitous alcohol marketing. There should be legislation to prohibit the sale of NoLos to children.

In view of the considerations listed above, we believe the Government should not update the labelling guidance and promote NoLos before a strong evidence base is established.

References

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