

## RESPONSIBILITY DEAL PLEDGE ON LABELLING

### 1. INTRODUCTION

- 1.1 As part of a Public Health Responsibility Deal agreed with the Government in March 2011, UK alcohol beverage companies have pledged to implement a health labelling scheme to better inform consumers about responsible drinking. This pledge is in line with the industry's response to a Department of Health (DH) consultation in May 2010 on options for improving information on the labels of alcoholic drinks to support consumers to make healthier choices in the UK.
- 1.2 The scheme, which has been developed in conjunction with the UK Department of Health, involves the display of particular health-related advisory information on drinks containers. Under the Responsibility Deal, the industry has pledged to implement the scheme on 80% of alcoholic drinks' containers measured, by volume, in the UK off-trade by December 2013<sup>1</sup>.
- 1.3 There are five elements that comprise the overall labelling scheme:
- [Required]*
  - I) Unit alcohol content
  - II) Chief Medical Officers' daily guidelines for lower-risk consumption
  - III) Pregnancy warning
  - [Optional]*
  - IV) [drinkaware.co.uk](http://drinkaware.co.uk)
  - V) Responsibility statement (e.g. "please drink responsibly")
- 1.4 The Department of Health, however, regards only the first three of these as critical in terms of their inclusion on containers. It is therefore only these three that are referenced in the Responsibility Deal and on which the industry will be judged in terms of whether it has met its expected commitment in communicating health information to consumers. While companies are encouraged to adopt all five elements, if they are unable for whatever reason to do so, it is these three that they should therefore prioritise for inclusion.
- 1.5 Under the Responsibility Deal, the Portman Group has agreed to commission and fund an in-store survey to measure whether the industry has achieved its target of 80% coverage. The Portman Group may

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<sup>1</sup> Small drinks containers with a volume of 50ml or below are exempted from this pledge on the grounds of practicality

- additionally monitor the industry's implementation of elements IV and V in accordance with these guidelines.
- 1.6 Section 2 of this document contains guidelines on the content and presentation of each of the above five elements. These guidelines will serve as the basis for deciding, during the monitoring process, whether a particular drinks container is compliant in its implementation of the scheme. (See appendix A for good practice examples and appendix B for examples of the display of unit alcohol content).
  - 1.7 Section 3 of this document gives more information on the monitoring and evaluation process.
  - 1.8 Companies intending to implement the labelling scheme are encouraged to seek confidential advice from the Portman Group at an early stage of design to help ensure compliance with these guidelines (though companies are reminded that in the eventual monitoring process, the final decision on compliance lies with the independent contractor and the Independent Complaints Panel – see section 3).
  - 1.9 Some companies may have agreed with the Department of Health to trial alternative presentations of health-related information, including information on the calorific content of the drink. For the purposes of monitoring the industry's achievement of its Responsibility Deal pledge, these containers will be judged compliant with the scheme.

## **2. LABELLING COMPLIANCE CRITERIA**

### **2.1 OVERALL CONTENT AND PRESENTATION**

- 2.1.1 The information, as a whole and for each individual element, should be clear, legible, displayed on the primary packaging and not be difficult for consumers to find. (Companies are encouraged, though not required for the purposes of compliance, to use a font size no smaller than the main body of information on the label and to include the information also on on-shelf secondary packaging).
- 2.1.2 The information should be grouped together. (Companies are encouraged, though not required for the purposes of compliance, to differentiate the information from other information on the packaging, for example by use of a box, spacing, background colour, etc).
- 2.1.3 The information should not appear on a part of the primary packaging that is dispensed with before or immediately when the product is opened.
- 2.1.4 The label should not contain anything which serves to undermine the health messaging.

### **2.2 UNIT ALCOHOL CONTENT**

- 2.2.1 The label should state the number of units in the drink with the suffix “UK Units” and displayed within an appropriate icon.
- 2.2.2 The number of units in the drink should be calculated by multiplying the volume of the drink (in ml) by the alcoholic strength by volume (ABV) and dividing the answer by 1000. (For example, the number of units in a 440ml can of beer with an ABV of 5% vol. is 2.2 units).
- 2.2.3 The number of units should be rounded to one decimal place. For example, 1.42 units becomes 1.4 and 2.65 units becomes 2.7.
- 2.2.4 The number of units should be calculated for the whole container rather than for a typical serving, even if it is a re-sealable, multi-serve container (for example, a bottle of spirit).
- 2.2.5 In the case of a multi-serve container (and this may include beer, cider and RTD containers above 500ml), companies are encouraged, though not required for the purposes of compliance, to display the number of units per typical serving. In this case:

- The typical serving for wine (up to alcohol 15% vol) should be taken as 125ml, the typical serving for spirits or liqueurs should be taken as 25ml and the typical serving for beer, cider and RTDs should be taken as 284ml (½ pint).
- The size of the typical serving should be stated, i.e. 125ml, 25ml or 284ml (½ pint).

2.2.6 If the unit alcohol content is optionally featured on the secondary packaging of retailed multi-packs, the individual container icon should be displayed, followed or prefixed by an indication of the number of containers within the pack.

## **2.3 CHIEF MEDICAL OFFICERS' GUIDELINES**

2.3.1 The label should state the Government's recommended lower-risk drinking guidelines as follows: "UK Chief Medical Officers [*or UK health departments/UK government/UK guidelines*] recommend men do not regularly exceed 3-4 units daily [*or a day/per day*] and women, 2-3 units daily [*or a day/per day*]".

2.3.2 The wording may vary slightly for ease of presentation only (see examples in Appendix A) but must always reflect precisely the above information.

2.3.3 Apart from as noted above, there should be no other variation to this wording.

## **2.4 PREGNANCY WARNING**

2.4.1 The label should either state "Avoid alcohol if pregnant or trying to conceive" or display an agreed circular logo showing the silhouette of a pregnant woman holding a wine glass with a line struck across it.

2.4.2 There should be no variation to the above.

## **2.5 DRINKAWARE.CO.UK (OPTIONAL)**

2.5.1 The label should state the website address of the independent charity, Drinkaware, preferably as [drinkaware.co.uk](https://www.drinkaware.co.uk) (though the prefix "www" is acceptable).

2.5.2 Prefixes such as “for the facts” may optionally be included provided they are in accordance with Drinkaware’s brand guidelines (see [http://www.drinkaware.co.uk/data/assets/pdf\\_file/0019/22438/Drinkaware-brand-guidelines-for-partners.pdf](http://www.drinkaware.co.uk/data/assets/pdf_file/0019/22438/Drinkaware-brand-guidelines-for-partners.pdf)).

## **2.6 RESPONSIBILITY STATEMENT (OPTIONAL)**

- 2.6.1 The label should include a statement encouraging responsible consumption such as “Drink responsibly”, “Drink in moderation”, “Drink sensibly” or “Know your limits”.
- 2.6.2 The prefix “Please” may be included.
- 2.6.3 The brand name may be included in the responsibility statement (e.g. “Please drink Brand X responsibly”) provided this is not done in a way that might undermine the sentiment of the statement.
- 2.6.4 Variations on the above should be checked with the Portman Group’s Advisory Service for an opinion as to whether they comply with the spirit of the labelling scheme.

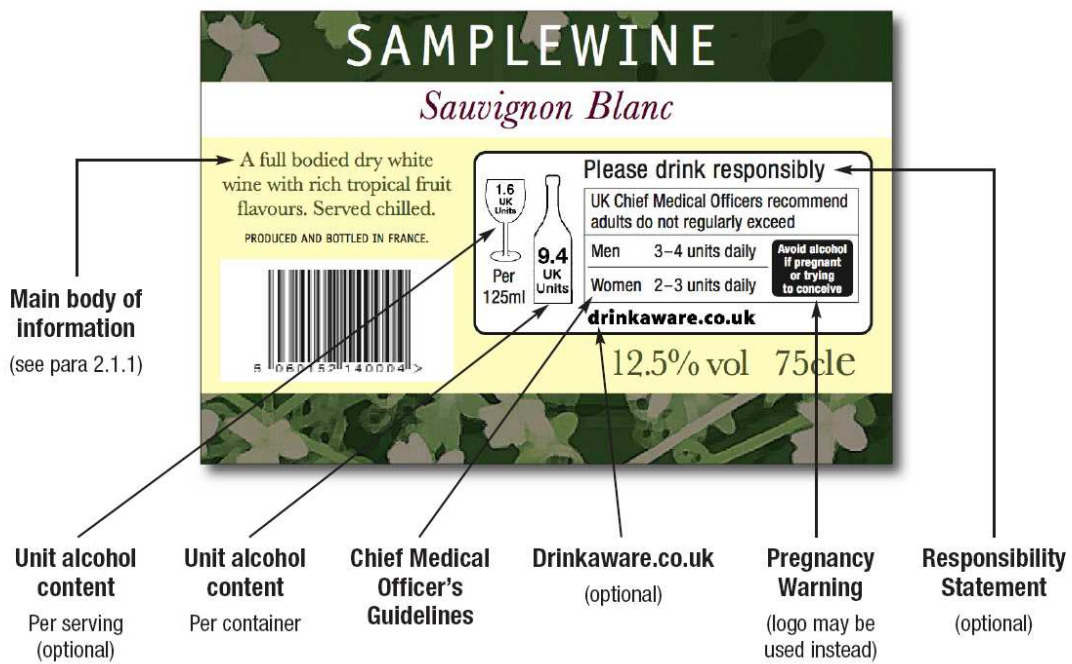
### **3. MONITORING PROCESS**

- 3.1 The Portman Group has agreed to undertake monitoring of the industry's implementation of its Responsibility Deal pledge on labelling. Below is an explanation of the monitoring process:
- 3.2 The Portman Group in August 2011 shall write to all companies that are signatories to the labelling pledge in the Responsibility Deal and/or that made a pledge on labelling at the time of the Government's consultation on this subject in April/May 2010 and ask those companies to re-affirm their labelling pledge.
- 3.3 The Portman Group shall furthermore ask those companies to confirm which brands their pledge will encompass; the annual sales volume of these brands; the company's overall annual sales volume; and the current extent of implementation.
- 3.4 The Portman Group shall record this information on a database. The information about the company's name, the brands that are encompassed, the overall proportion of the company's sales volume that these brands represent and the current extent of implementation shall be publicly accessible.
- 3.5 In Autumn of 2012 and 2013, the Portman Group shall contact each company on the database to ask for an update on the existing extent of implementation. In February of 2012 and 2013, the Department of Health shall contact each company who is a signatory to the labelling pledge in the Responsibility Deal to ask for a similar update. The Portman Group shall update the database accordingly on each occasion and use this information to estimate the overall extent of implementation at that time.
- 3.6 Any company not on the database but which is committed to implementing the labelling scheme on some or all of its products may, at any time, ask to be added to the database.
- 3.7 By no later than the third quarter of 2013, the Portman Group shall draw up a brief for an independent contractor to conduct a monitoring exercise. This brief shall be agreed with the Department of Health.
- 3.8 The independent contractor shall be appointed by the Portman Group in consultation with the Department of Health, if necessary after a tender process.

- 3.9 The independent contractor shall be responsible for the collection and analysis of alcoholic drinks labels throughout the UK. The samples shall be collected by no later than January 2014.
- 3.10 Compliance will be assessed against the guidelines on compliance criteria contained in this document.
- 3.11 Some companies may have agreed with the Department of Health to trial alternative presentations of health-related information, including information on the calorific content of the drink. For the purposes of monitoring the industry's achievement of its Responsibility Deal pledge, these containers shall be judged compliant with the scheme.
- 3.12 The independent contractor shall assess whether, in its opinion, labels are compliant with the scheme or not. In the case of those products assessed as compliant, the Department of Health may appeal the decision if it disagrees with the assessment. In the case of those products assessed as non-compliant by virtue of presentation (i.e. information is present but is judged not to meet the compliance criteria), the company shall be notified and given an opportunity to appeal the decision.
- 3.13 Appeals shall be referred to the Independent Complaints Panel (ICP) of the Portman Group. [The ICP is the independent body responsible for considering complaints made under the Portman Group's Code of Practice.] The ICP shall be invited to assess the label against the compliance criteria and decide whether or not it agrees with the independent contractor's decision. The ICP's decision is final.
- 3.14 All decisions shall be recorded in the final report to be prepared by the independent contractor. This report shall record the extent to which individual companies have achieved their publicly-available pledges. It shall also estimate whether the industry has achieved its overall target level of implementation. The report shall be published on the Portman Group and Department of Health websites.

**July 2011**

## ACCEPTABLE LAYOUT



EXAMPLE LAYOUTS (5 elements)

**PLEASE DRINK RESPONSIBLY**

UK Chief Medical Officers recommend  
men do not regularly exceed  
3-4 units daily and  
women, 2-3 units daily

[drinkaware.co.uk](http://drinkaware.co.uk)




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UK Chief Medical Officers recommend  
men do not regularly exceed  
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women, 2-3 units daily

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Avoid alcohol  
if pregnant  
or trying  
to conceive



Per  
25ml



**KNOW YOUR LIMITS**



UK Chief Medical Officers recommend  
adults do not regularly exceed

Men	3-4 units daily
Women	2-3 units daily


[drinkaware.co.uk](http://drinkaware.co.uk)




### EXAMPLE LAYOUTS (3 elements)

 <b>1.7</b> UK Units	<b>UK Health Departments          recommend men do not          regularly exceed 3-4 units          daily and women, 2-3 units daily</b>	
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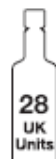
 <b>9.1</b> UK Units	<b>UK Chief Medical Officers recommend          adults do not regularly exceed</b>	
<b>Men 3-4 units daily</b>	<b>Avoid alcohol          if pregnant          or trying          to conceive</b>	
<b>Women 2-3 units daily</b>		

Appendix B

## PROTOTYPES OF UNIT LABELS

All calculations are based on typical container sizes.

700ml bottle of spirits  
(alc 40% vol)



750ml bottle of fortified wine  
(alc 17% vol)



750ml bottle of table wine  
(alc 12% vol)



275ml bottle of beer/cider/RTD  
(alc 5.0% vol)



330ml bottle of beer/cider/RTD  
(alc 5.0% vol)



330ml can of beer/cider/RTD  
(alc 5.0% vol)



multi-pack of 24 x 330ml cans of beer/cider/RTD  
(alc 5.0% vol)



(optional)  
284ml (1/2 pint) glass of beer/cider/RTD  
(alc 5% vol)



Per 284ml (1/2 pint) serving

(optional)  
125ml glass of wine  
(alc 12% vol)



Per 125ml serving

(optional)  
25ml glass of spirit  
(alc 40% vol)



Per 25ml serving

The number of units has been calculated by multiplying the declared volume (in ml) by the declared alcoholic strength (ABV) and then dividing by 1000.