

To: Lead Food Officers
Cc: SFELC, REHIS

30-11-2017

FSS/ ENF / 17 / 021

Dear Colleague,

ALCOHOLIC DRINK VOLUNTARY LABELING UPDATE

In August 2016, the UK Chief Medical Officers (CMOs) published new finalised guidelines on low risk drinking. The Department of Health in England has been working closely with the UK alcohol Industry and published voluntary guidance on the 24 March 2017 regarding how the guidelines could be communicated on labels. This guidance is endorsed by the Scottish Government.

This is available here: <https://www.gov.uk/government/publications/communicating-the-uk-chief-medical-officers-alcohol-guidelines>

While placing the CMO low risk drinking guidelines on product packaging is not mandatory at present, all Governments within the UK are actively encouraging alcohol producers to print the new guidelines directly onto product labels, cans and packaging, in order to inform consumers adequately.

The above voluntary labelling guidelines communicated 3 key messages from the CMO guidance to be reflected on pre-packaged alcohol products:

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

A noticeable change from the old guidance to the new is the move from the daily unit guidelines to weekly. The daily unit statements on pre-packaged alcohol beverages are therefore no longer accurate and we are aware of concerns that they could be considered misleading and potentially breach the EU Food Information to Consumers Regulation (EU) No 1169/2011 (FIC).

Given the size of the UK alcohol market and the variety of products available, with some stock moving at a faster pace than others, the Department of Health agreed with the UK alcohol industry a transitional period to run until 1 September 2019. Again, this is endorsed by the Scottish Government. It is expected that labels on higher turnover pre-packaged alcohol beverages will start to reflect the new CMO guidelines over the next 12 months.

Any products produced before the end date of the transition period, which may stay on shelf for a number of years, can continue to be sold until stocks are exhausted as is general practice around any new labelling arrangements, because labels were correct at time of production. This allows time for the products to make it through the supply chain and off the shelves and is particularly important for an industry in which many products have a long shelf life.

Food Standards Scotland discussed the transitional arrangements at the recent meeting of the Food Standards Sub-Committee of the Scottish Food Enforcement Liaison Committee. The members agreed that allowing a transitional period is a reasonable approach and that a letter for Local Authorities in Scotland to explain the background would be helpful.

Local Authorities are asked to make relevant food business operators aware of the new guidelines during scheduled inspections and, where necessary, encourage them to update their labelling as soon as possible to reflect the revised advice from the CMOs.

Please bring this letter to the attention of all relevant officers in your Authority.

If you should have any queries please do not hesitate to contact us at enforcement@fss.scot.

Yours faithfully,

Grainne Gilson

Enforcement Delivery,

Food Standards Scotland.