

Updating labelling guidance for no and low-alcohol alternatives: WithYou response

- Details [here](#)
- Closes 23 November 2023.

Q: 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?

- Yes
- No
- **Don't know**

For clarity for all consumers, we believe only one label should be used and 'low-alcohol' is more accurate and clearer than 'alcohol-free'. With either label, ABV must be included on NoLo product labels.

As an alcohol treatment provider, we would like to emphasise the potential implications for people in recovery from alcohol dependence. Our clinical team does not recommend NoLo products for people on certain medications (Disulfiram/Antabuse) for the very reason that they often still contain a small amount of alcohol, and side effects can be severe even from products such as mouthwash. However, concerns remain about 0.5% being marketed as 'alcohol-free'. This would increase risk as not everyone on that medication will necessarily take on board the advice. Additionally, others may inadvertently give them something 'alcohol free' without realising the risks. There is potential for 'alcohol free' to be understood as 'risk free'.

We know NoLo drinks products can play an important role for some people in helping them reduce their levels of drinking. This can also be the case for people looking to take the first steps in recovery.

However, people can find it difficult to differentiate between alcohol-free and alcoholic products of alcohol brands due to the similarity of the branding and so labelling is extremely important. Where alcohol is present in even small concentrations, the label

'low alcohol' is more accurate than 'alcohol free' for products which contain none. We appreciate that it is very hard to extract 100% of a substance like alcohol when it is often included in products as a preservative, or may be produced over a short space of time by ingredients in a product manufactured entirely without it. This may mean that 'alcohol-free' is not a meaningful label and should not be pursued.

If the change is made, we would urge that the product is labelled with the percentage alcohol clearly next to this phrase, to aid appropriate consumer decision making.

Q: Do you think changes to the descriptors, if implemented, will help to deliver the government's policy aims for reducing alcohol related harms?

- Yes
- **No**
- Don't know

We view the proposed changes as principally being about improving consumer choice. Whilst this may support behaviour change for low to moderate drinkers looking to cut back, there is little evidence that this will impact the broader picture of alcohol harms. The harm associated with alcohol dependence and binge drinking, which include increased pressure on emergency services and the NHS, are unlikely to be meaningfully affected by changes to NoLo descriptors.

We also believe the emphasis on individual choices is of limited value when considering people experiencing alcohol dependence or people in recovery.

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

- **Yes**
- No
- Don't know

Whilst drinks below 0.5%ABV can legally be sold to young people, it is important to signal to young people and their parents that these drinks are not appropriate for under 18s, and that they are intended as a substitute for people who would otherwise be drinking alcohol. There is a comparison to be drawn with vaping. Many young people have tried vaping nicotine products, leading to concerns that a new generation has been introduced to nicotine and at a younger age. Whilst evidence is still emerging about the role of vaping as a 'gateway' to smoking tobacco products, it is pertinent to consider how industry may use products designed to help adults cut down on a harmful habit to actually attract a new, younger audience.

Q: 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?

- Yes – government
- Yes – industry
- **Yes – government and industry**
- No
- Don't know

Please see our previous answer about the concerns of NoLo products becoming a 'gateway' to consuming alcoholic products.

Q: Do you think the government should do more to encourage consumers who drink above CMOs' lower risk guidelines to substitute standard-strength alcohol with NoLo products in order to reduce alcohol harms?

- Yes
- No
- **Don't know**

We know that alcohol advertising often relies on brand identity and relationship with consumers. Many of the same brands sell alcoholic and low-alcohol products and often with similar names and branding. Therefore a government promotion of NoLo products could inadvertently mean an overall increase in exposure for these brands. The potential impact of increased advertising on young people and people in recovery from alcohol dependence must be considered.

In addition, there is a limited evidence base that NoLo products will reduce alcohol harm. As stated previously, a policy focus on promoting NoLo products enforces a narrative of individual choice, and does not sufficiently consider the needs of people in recovery. Instead, policy should focus on well-evidenced measures of reducing alcohol harm, including expanding the availability of alcohol treatment, increased communication about the health risks of alcohol, and ensuring more people are aware of how to seek support if their drinking becomes an issue for them.

Q: What outcomes do you think the government should monitor to assess whether the policy objectives set out in this consultation are being met?

Please refer to our previous answer explaining that we do not believe that these proposed changes will have a notable impact on policy objectives. Accordingly, we do not believe there will be any meaningful outcomes to assess.

