

Revision of EU legislation on Food Information to Consumers

Fields marked with * are mandatory.

Introduction

Target Group

All EU and non-EU citizens and stakeholders are welcome to contribute to this consultation.

Objective of the consultation

The public consultation aims to collect the views of citizens, professional and non-professional stakeholders about proposals for the revision of Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC Regulation) in the following areas: Front of pack nutrition labelling/ Nutrient profiling, Origin labelling, Date marking and Alcoholic beverage labelling.

The proposed revision to the FIC regulation

The European Commission adopted the “Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system” on 20 May 2020, as part of the European Green Deal. This strategy aims to reduce the environmental and climate footprint of the EU food system and facilitate the shift to healthy and sustainable diets. The strategy targets the entire food chain and describes, amongst others, the need to stimulate sustainable food processing and reformulation, to further empower consumers through labelling information and to reduce food waste. The proposed revision of the FIC Regulation will address this need by considering:

- Front of pack nutrition labelling and nutrient profiling criteria to restrict claims: a proposal for EU harmonized and mandatory front-of-pack nutrition labelling and for the setting of ‘nutrient profiling’ criteria, which are thresholds of nutrients above or below which nutrition and health claims on foods are restricted.
- Origin labelling: An extension of mandatory origin indications to certain products.
- Date marking: A revision of the EU rules on date marking (‘use by’ and ‘best before’).

The European Commission adopted the Europe’s Beating Cancer Plan on 3 February 2021. One of its areas of action concerns sustainable cancer prevention, including by reducing harmful alcohol consumption. The proposed revision of the FIC Regulation will address this concern by considering:

- Alcoholic beverage labelling: The introduction of mandatory indications of the list of ingredients and the nutrition declaration for all alcoholic beverages.

Where are we in the process of revising the FIC Regulation

Inception Impact Assessments for the above-stated FIC Regulation revisions were published for public consultation between 23 December 2020 - 04 February 2021 (for nutrient profiles and front-of-pack nutritional labelling, origin labelling and date marking), and 24 June 2021 - 22 July 2021 (for alcoholic beverage ingredient and nutrition declaration labelling). Feedback from these consultations has been used to further refine understanding of the problems and potential policy options and their impacts.

The European Commission will base its revision of the FIC Regulation on a full impact assessment of the different options. The impact assessment will also consider the setting of nutrient profiles as provided in Regulation (EC) No. 1924/2006 on nutrition and health claims made on foods.

This Public Consultation will contribute to the evidence that will inform the impact assessment for the revision of the FIC Regulation. It is part of a broader consultation strategy. Additional consultation activities will include targeted surveys and interviews with stakeholder organisations and Member State Authorities, to gather more detailed and technical information.

A FIC Regulation proposal is expected to be made by the end of 2022.

How to contribute

Your views are important. Please tell us what you think and fill in the online questionnaire. The questionnaire includes questions on:

- Front-of-pack nutrition labelling and the setting of nutrient profiles to restrict the use of claims on foods – Questions 1 to 5
- Alcoholic beverage labelling (list of ingredients and nutrition declaration) – Questions 6 to 9
- Date marking – Questions 10 to 14
- Origin labelling – Questions 15 to 20

The questionnaire for citizens is accessible in all official EU languages. As there may be delays in translating replies submitted in some languages, contributions in English are welcome, as they will help to process the survey more swiftly.

You can pause at any time and continue later. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire. Questions marked with an asterisk (*) are compulsory. Those who are interested have the option to develop their responses in a more detailed manner.

Please note that in this questionnaire, we do not intend to obtain data relating to identifiable persons. Therefore, in case you will describe a particular experience or situation, please do it in a way that will not allow linking to a particular individual, whether it is you or somebody else.

Received contributions will be published on the Internet. It is important that you read the specific privacy statement attached to this consultation for information on how your personal data and contribution will be dealt with.

Related links

Further information on the prospective revision and impact assessment can be found at https://ec.europa.eu/food/safety/labelling-and-nutrition/food-information-consumers-legislation_en.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business organisation
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☒

Non-governmental organisation (NGO)

- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

riccardo

* Surname

moschetti

* Email (this won't be published)

riccardo.moschetti@europeancancer.org

* Organisation name

255 character(s) maximum

European Cancer Organisation

* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

51022176260-12

* Country of origin

Please add your country of origin, or that of your organisation.

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| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> | <input type="radio"/> Lithuania | <input type="radio"/> |

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<input type="radio"/> Algeria	<input type="radio"/> Ecuador	<input type="radio"/> Luxembourg	<input type="radio"/> Samoa
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<input type="radio"/> Bahrain	<input type="radio"/> French Polynesia	<input type="radio"/> Micronesia	<input type="radio"/> South Africa
<input type="radio"/> Bangladesh	<input type="radio"/> French Southern and Antarctic Lands	<input type="radio"/> Moldova	<input type="radio"/> South Georgia and the South Sandwich Islands
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<input checked="" type="radio"/> Belgium	<input type="radio"/> Germany	<input type="radio"/> Montenegro	<input type="radio"/> Spain
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<input type="radio"/> Benin	<input type="radio"/> Gibraltar	<input type="radio"/> Morocco	<input type="radio"/> Sudan
<input type="radio"/> Bermuda	<input type="radio"/> Greece	<input type="radio"/> Mozambique	<input type="radio"/> Suriname
<input type="radio"/> Bhutan	<input type="radio"/> Greenland	<input type="radio"/> Myanmar/Burma	<input type="radio"/> Svalbard and Jan Mayen
<input type="radio"/> Bolivia	<input type="radio"/> Grenada	<input type="radio"/> Namibia	<input type="radio"/> Sweden
<input type="radio"/>	<input type="radio"/> Guadeloupe	<input type="radio"/> Nauru	<input type="radio"/> Switzerland

Bonaire Saint Eustatius and Saba			
◉ Bosnia and Herzegovina	◉ Guam	◉ Nepal	◉ Syria
◉ Botswana	◉ Guatemala	◉ Netherlands	◉ Taiwan
◉ Bouvet Island	◉ Guernsey	◉ New Caledonia	◉ Tajikistan
◉ Brazil	◉ Guinea	◉ New Zealand	◉ Tanzania
◉ British Indian Ocean Territory	◉ Guinea-Bissau	◉ Nicaragua	◉ Thailand
◉ British Virgin Islands	◉ Guyana	◉ Niger	◉ The Gambia
◉ Brunei	◉ Haiti	◉ Nigeria	◉ Timor-Leste
◉ Bulgaria	◉ Heard Island and McDonald Islands	◉ Niue	◉ Togo
◉ Burkina Faso	◉ Honduras	◉ Norfolk Island	◉ Tokelau
◉ Burundi	◉ Hong Kong	◉ Northern Mariana Islands	◉ Tonga
◉ Cambodia	◉ Hungary	◉ North Korea	◉ Trinidad and Tobago
◉ Cameroon	◉ Iceland	◉ North Macedonia	◉ Tunisia
◉ Canada	◉ India	◉ Norway	◉ Turkey
◉ Cape Verde	◉ Indonesia	◉ Oman	◉ Turkmenistan
◉ Cayman Islands	◉ Iran	◉ Pakistan	◉ Turks and Caicos Islands
◉ Central African Republic	◉ Iraq	◉ Palau	◉ Tuvalu
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◉ China	◉ Israel	◉ Papua New Guinea	◉ United Arab Emirates
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◉ Cocos (Keeling) Islands	◉ Japan	◉ Philippines	◉

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| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not

be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Information on your organization

If you are a food business or representative of food businesses, please indicate the following (if this does not apply to you, please select 'not applicable'):

* What is the geographic scope of your business / members' markets? (If this does not apply to you, please select 'not applicable')

- ☐ Single EU Member State/ EEA country
- ☒ Multiple Member States (including EEA countries) / Pan-EU
- ☐ International
- ☐ Not applicable

* Which stage(s) of the value chain is your business / are you members' businesses active in? Please select all that apply (if this does not apply to you, please select 'not applicable').

- ☐ Primary producer (e.g. farming, fishing)
- ☐ Manufacturers/processing
- ☐ Distribution
- ☐ Retail
- ☒ Not applicable

* Which food/beverage product groups is your business active in / does your organization represent? Please select all that apply (if this does not apply to you, please select 'not applicable').

- ☐ Meat and meat products
- ☐ Fish and seafood products
- ☐

- Fruit and their products
- ☐ Vegetables and their products
- ☐ Vegetable and animal oils/fats and spreadable fats
- ☐ Milk
- ☐ Dairy products
- ☐ Bakery products
- ☐ Cereal and cereal products including biscuits and breakfast cereals
- ☐ Confectionary products, ice cream
- ☐ Ready meals, soups, sandwiches
- ☐ Soy based and similar vegetable protein-based products
- ☐ Beverages - wine or aromatized wine products
- ☐ Beverages - beers
- ☐ Beverages - spirit drinks
- ☐ Beverages - other alcoholic beverage's
- ☐ Beverages - non-alcoholic beverages
- ☐ Other food products
- ☒ Not applicable

Interest in the FIC Regulation revision

* Which FIC Regulation topics are you interested in? Please select all that apply.

- ☒ Front-of-pack nutrition labelling and the setting of nutrient profiles to restrict the use of claims on foods – Questions 1 to 5
- ☒ Alcoholic beverage labelling (list of ingredients and nutrition declaration) – Questions 6 to 9
- ☐ Date marking – Questions 10 to 14
- ☐ Origin labelling – Questions 15 to 20

Front of pack nutrition labelling and setting nutrient profiling criteria to restrict claims

Under the current EU rules, the indication of simplified nutrition information on the front of the food packaging ('front-of-pack') is possible on a voluntary basis. Several formats are legally possible under certain conditions and are currently present on the EU market. The European Commission is considering harmonised mandatory front-of-pack nutrition labelling for pre-packed foods present on the EU market.

*Products may bear **nutrition claims** (such as "low fat", "high fibre") and **health claims** (such as "Vitamin D is needed for the normal growth and development of bone in children"). The European Commission is*

considering restricting the right to make such claims to only the products that would meet defined nutritional criteria such as for example the content of sugar, salt etc.



Question 1: To what extent do you agree with the following statements:

	1 - Strongly disagree	2 - Disagree	3 - Neutral	4 - Agree	5 - Strongly agree	Don't know
* Nutrition labelling on the front-of-pack is an important tool to improve the population's dietary habits.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Consumers pay more attention to nutrition information on the front-of-pack compared to the nutrition declaration on the back-of-pack.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Simplified and easy to understand nutrition information on the front-of-pack helps consumers to make healthier food choices.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Nutrition information on the front-of-pack should be consistent with dietary guidelines.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Consumers should have access to the same front-of-pack nutrition label across the whole EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Food businesses should be subject to the same rules on front-of-pack nutritional labelling across the whole EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Front-of-pack nutrition information should be displayed on more products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Front-of-pack nutrition labelling is an appropriate tool to incentivise food businesses to improve the nutritional content of their products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Health and nutrition claims on food products should only be allowed if they meet some nutritional quality (e.g. levels of salt, sugars,...).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Question 2: In your opinion, how likely is each of the following options to encourage consumers to change their food purchasing behaviour?

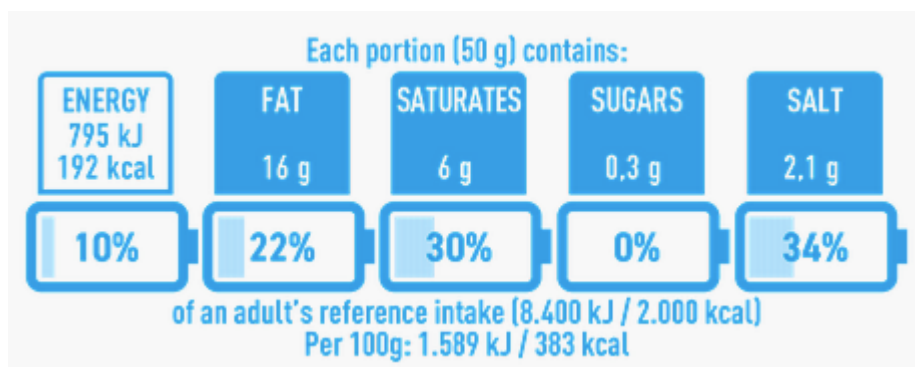
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	1 - Very unlikely	2 - Unlikely															
<p>* Information on the amounts of specific nutrients (fat, saturated fat, sugars, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake.</p> <p><i>Example:</i></p> <div><p>Each portion (50 g) contains:</p><table><tr><td>ENERGY 795 kJ 192 kcal</td><td>FAT 16 g</td><td>SATURATES 6 g</td><td>SUGARS 0,3 g</td><td>SALT 2.1 g</td></tr><tr><td>10%</td><td>22%</td><td>30%</td><td>0%</td><td>34%</td></tr></table><p>of an adult's reference intake (8.400 kJ / 2.000 kcal) Per 100g: 1.589 kJ / 383 kcal</p><p>Per 25g:</p><table><tr><td>586kJ 140kcal 7%*</td><td>fat 11,3g 16%*</td><td>saturates 3,0g 15%*</td><td>sugars 6,1g 7%*</td><td>salt 1,4g 23%*</td></tr></table><p>Per 100g: 2343kJ / 560kcal</p></div>	ENERGY 795 kJ 192 kcal	FAT 16 g	SATURATES 6 g	SUGARS 0,3 g	SALT 2.1 g	10%	22%	30%	0%	34%	586kJ 140kcal 7%*	fat 11,3g 16%*	saturates 3,0g 15%*	sugars 6,1g 7%*	salt 1,4g 23%*		
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586kJ 140kcal 7%*	fat 11,3g 16%*	saturates 3,0g 15%*	sugars 6,1g 7%*	salt 1,4g 23%*													
<p>* Information on the amounts of specific nutrients (fat, saturated fat, sugar, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake. Colours are used to classify those nutrients per 100 g of the product as 'low' (green), 'medium' (amber) or 'high' (red).</p> <p><i>Example:</i></p> <div><p>Each serving (150g) contains</p><table><tr><td>Energy 1046kJ 250kcal 13%</td><td>Fat 3.0g LOW 4%</td><td>Saturates 1.3g LOW 7%</td><td>Sugars 34g HIGH 38%</td><td>Salt 0.9g MED 15%</td></tr></table><p>of an adult's reference intake Typical values (as sold) per 100g: 697kJ/ 167kcal</p></div>	Energy 1046kJ 250kcal 13%	Fat 3.0g LOW 4%	Saturates 1.3g LOW 7%	Sugars 34g HIGH 38%	Salt 0.9g MED 15%												
Energy 1046kJ 250kcal 13%	Fat 3.0g LOW 4%	Saturates 1.3g LOW 7%	Sugars 34g HIGH 38%	Salt 0.9g MED 15%													
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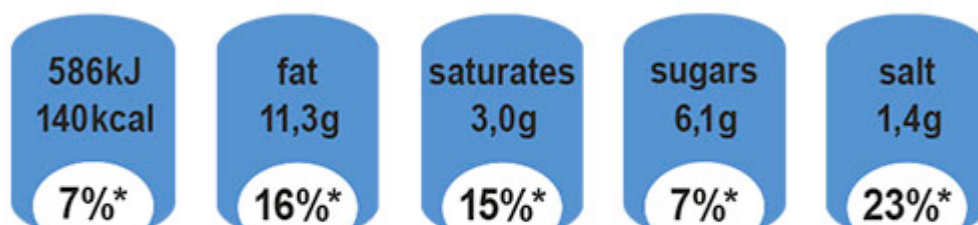
<p>Information on a product's overall nutritional value (based on the integration of both unfavourable elements (sugars, saturated fat, salt and calories) and favourable elements (protein, fibre and content of fruits, vegetables, pulses, nuts and olive /rapeseed/walnut oils)) through a graded indicator that can be applied on all products. Colours and letters are used to classify the overall nutritional value of the product, from 'highest nutritional value' (dark green, A) to 'lower nutritional value' (dark orange, E).</p> <p><i>Example:</i></p> 	<input type="radio"/>	<input type="radio"/>
<p>* Information on a product's overall nutritional value through a positive (endorsement) logo that can be applied on foods that comply with specific nutritional criteria only. The criteria can be based on e.g. amount of fat, saturated fat, sugars, salt, fibre, wholegrain, fruit and vegetables depending on the food category and the specific label.</p> <p><i>Example:</i></p> 	<input type="radio"/>	<input checked="" type="radio"/>
<p>* A combination of the above options: information on the overall nutritional quality of a product combined with information on the content of specific nutrients.</p>	<input type="radio"/>	<input type="radio"/>

Question 3: In your opinion, how likely is each of the following options to encourage businesses to improve the nutritional aspects of their products?

	1 - Very unlikely	2 - Unlikely
<p>* Information on the amounts of specific nutrients (fat, saturated fat, sugars, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake.</p> <p><i>Example:</i></p>		



Per 25g:

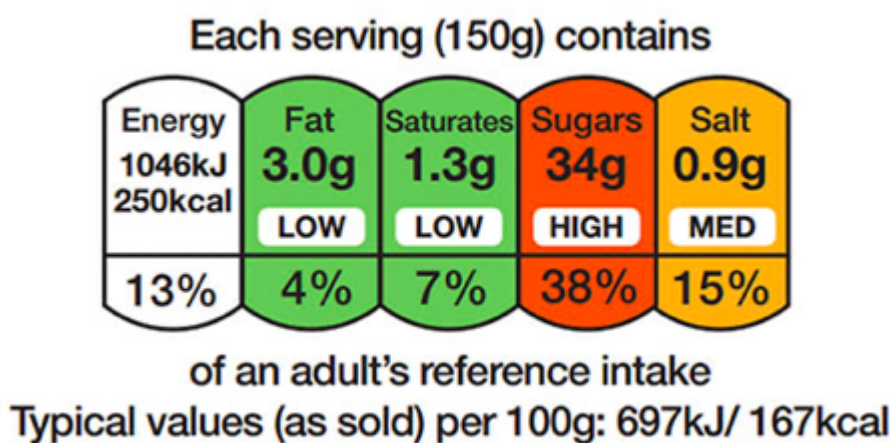


Per 100g:



2343kJ / 560kcal

* Information on the amounts of specific nutrients (fat, saturated fat, sugar, salt) and on the energy value in a portion of the food, as well as how much this represents as a percentage of the daily reference intake. Colours are used to classify those nutrients per 100 g of the product as 'low' (green), 'medium' (amber) or 'high' (red).

Example:



* Information on a product's overall nutritional value (based on the integration of both unfavourable elements (sugars, saturated fat, salt and calories) and favourable elements (protein, fibre and content of fruits, vegetables, pulses, nuts and olive /rapeseed/walnut oils)) through a graded indicator that can be applied on all products. Colours and letters are used to classify the overall nutritional value of the product, from 'highest nutritional value' (dark green, A) to 'lower nutritional value' (dark orange, E).

<p><i>Example:</i></p> 	<input type="radio"/>	<input type="radio"/>
<p>* Information on a product's overall nutritional value through a positive (endorsement) logo that can be applied on foods that comply with specific nutritional criteria only. The criteria can be based on e.g. amount of fat, saturated fat, sugars, salt, fibre, wholegrain, fruit and vegetables depending on the food category and the specific label.</p> <p><i>Example:</i></p> 	<input type="radio"/>	<input type="radio"/>
<p>* A combination of the above options: information on the overall nutritional quality of a product combined with information on the content of specific nutrients.</p>	<input type="radio"/>	<input type="radio"/>

Question 4: If EU rules meant that food product manufacturers could only make health and nutrition claims on foods that met defined nutritional criteria, how likely is the following?

	Very unlikely	Unlikely	Neutral	Likely	Very likely
<p>* Food businesses whose products were bearing claims before the new criteria were introduced, but whose products do not meet the new criteria, will change the recipe of their products to make them healthier so that they may keep health and nutrition claims on their products.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* Food businesses whose products were not bearing claims before the new criteria were introduced, and whose products do not meet the new criteria, will change the recipe of their products to make them healthier so that they may add health and nutrition claims to their products.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 5: If you would like to raise other issues pertinent to the issues of front of pack nutrition labelling and the setting of nutrient profiling criteria to restrict claims, please provide details below.

1000 character(s) maximum

The need to include clear, uniform and accessible information to consumers is extremely important given that more than half of the adult population is now overweight. Excess body fat is associated with nine cancer sites (esophagus,colorectum, gallbladder, pancreas, postmenopausal breast, endometrium, ovary, kidney, and prostate[advanced stage]), representing an estimated 5-6.5% of the European cancer burden.

ECO expresses support for the introduction of harmonized, clear and accurate mandatory front-of-pack nutrition labelling and the establishment of nutrient profiles. This provides information to consumers and helps them make more informed choices about food products.

We therefore support systems that meet the purpose of front-of-pack labelling by providing information to help consumers understand how healthy a product is, such as the Nutri-Score. Making nutrition information understandable and uniform across European countries, will assist consumers in being more informed

If you wish to provide additional information relevant to front of pack nutrition labelling and the setting of nutrient profiling criteria to restrict claims (for example a position paper or evidence report) or raise specific points not covered by this questionnaire, you can upload your additional document here. The maximum file size is 1 MB. Provision of a document is optional and serves as additional background reading to help us understand your position better.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

3764a7c5-0471-4229-8c9e-d70d44fce4dc/FINAL_RESPONSE_MADE_ON_FOOD_LABELLING.pdf

Alcoholic beverage labelling

While the FIC Regulation provides that prepacked foods have to bear a list of ingredients and a nutrition declaration on labels, it currently exempts alcoholic beverages containing more than 1.2% by volume of alcohol from this.

The forthcoming revision of the Common Market Organisation (CMO) Regulation should lead to the introduction of rules governing the labelling of wine ingredients and nutrition declaration. These rules might be further amended through the proposed revision of the FIC Regulation. The same applies to aromatized wine products regulated by Regulation (EU) No 251/2014 which is also under review in the framework of the Common Agricultural Policy (CAP) Reform.

Under the FIC revision, the Commission is considering revoking the current exemption applicable to alcoholic beverages containing more than 1.2% by volume of alcohol and requiring them to include a list of ingredients and a nutrition declaration (i.e. table providing energy, protein, fat, saturated fat, carbohydrates, sugars and salt).

Question 6: To what extent do you agree with the following statements:

	1 - Strongly disagree	2 - Disagree	3 - Neutral	4 - Agree	5 - Strongly agree	Don't know
* A list of ingredients and nutritional information should be provided to consumers for alcoholic beverages as is the case for other foods and beverages.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The type of information provided to consumers should be the same for all categories of alcoholic beverages (e.g. beers, wines, spirit drinks,...).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Consumers should have access to the same information for alcoholic beverages across the whole EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Food businesses should be subject to the same labelling rules for alcoholic beverages across the whole EU.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Food business operators voluntarily provide sufficient information to consumers on the ingredients of alcoholic beverages.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food business operators voluntarily provide sufficient information to consumers on the nutritional content of alcoholic beverages.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food business operators voluntarily provide sufficient information to consumers on the energy value of alcoholic beverages.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Information on alcoholic beverage ingredients and nutritional content could be provided 'on label' or 'off label'. If provided 'off label' then a QR code would be included 'on label'. The QR code would take the consumer to a website where they can access the list of ingredients and information on nutritional content.

Question 7: How do you think the information on nutritional content and ingredients should be provided to consumers? Please select one option for each information type.

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	On-label	Off label accessed via a QR code	No need for such information	No opinion
* Full nutrition declaration (energy value, fat, saturates, carbohydrate, sugars, protein and salt)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Nutrition declaration only on energy value (Kcal/KJ)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* List of ingredients	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 8: If the list of ingredients and the nutrition declaration were provided to consumers off label, accessed using a QR code provided on the label, to what extent do you agree with the following statements:

	1 - Strongly disagree	2 - Disagree	3 - Neutral	4 - Agree	5 - Strongly agree	Don't know
* Consumers have the equipment (mobile phone and internet connection) to access the off- label information through the QR code when buying alcoholic beverages.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Consumers will make use of the off-label information when buying alcoholic beverages.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Consumers pay the same attention to the nutritional declaration						

and the list of ingredients when they are provided on the label or when it is provided through a QR code.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The provision of information on the nutritional declaration and the list of ingredients via a QR code, redirecting to a website, is as reliable as the provision of the same information on labels.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 9: If you would like to raise other issues pertinent to the issues of alcoholic beverage labelling, please provide details below.

1000 character(s) maximum

Alcohol is the 3rd leading risk factor for disease and mortality in Europe and a risk factor in the development of over 60 diseases, including 7 types of cancer: Mouth, upper throat, larynx, esophagus, breast, liver and colorectal cancer. Europe has the highest levels of alcohol consumption in the world: in the European region, it accounts for about 8% of cancer incidence, corresponding to 180,000 cancer cases and 92,000 cancer deaths per year.

In line with the Beating Cancer Plan's action to support cancer prevention, ECO supports the inclusion of additional labeling information for consumers that emphasizes health warnings such as the link between alcohol consumption and cancer.

Cancers attributable to alcohol can be prevented by reducing alcohol consumption and using effective policies to achieve this goal. We support strong measures to improve public awareness of the health effects of alcohol consumption, including proposals to introduce mandatory health warnings on alcohol labelling

If you wish to provide additional information relevant to alcoholic beverage labelling (for example a position paper or evidence report) or raise specific points not covered by this questionnaire, you can upload your additional document here. The maximum file size is 1 MB. Provision of a document is optional and serves as additional background reading to help us understand your position better.

Additional contributions

If you would like to raise other issues pertinent to the topics covered in this consultation, please provide details below.

3000 character(s) maximum

Scientific research conducted by the World Health Organization has confirmed that there is a direct relationship between alcohol consumption and the development of certain cancers, liver disease, and cardiovascular disease, regardless of the alcohol level, and type of alcoholic beverage. There is no such thing as safe consumption in alcohol consumption (1).

Recalling the policy objective of the European Beating Cancer plan to reduce alcohol consumption, including the goal of achieving a relative reduction of at least 10% in harmful use of alcohol by 2025 (2), the European Cancer Organisation (ECO) emphasises that additional policy actions, such as improved product labelling, including mandatory health warnings, are a much needed policy tool to achieve the stated goal.

ECO also stresses the urgency of coordinated action at European level, as the alcohol industry employs extensive lobbying resources to prevent the introduction and implementation of effective measures. Currently, awareness of the link between alcohol consumption and cancer risk remains low among the general population (3).

ECO strongly recommends including health information and warning information on-label, as it is more easily accessible for consumers, at the point of purchase, consumption and even disposal. Health information of this nature should not be hidden behind QR codes.

1)<https://www.euro.who.int/en/health-topics/disease-prevention/alcohol-use/news/news/2018/09/there-is-no-safe-level-of-alcohol,-new-study-confirms>

2)https://ec.europa.eu/health/system/files/2022-02/eu_cancer-plan_en_0.pdf

3)<https://www.euro.who.int/en/health-topics/disease-prevention/alcohol-use/news/news/2018/02/raising-awareness-of-the-link-between-alcohol-and-cancer>

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