

Low Alcohol Descriptors Consultation  
Healthy Behaviours  
Department of Health and Social Care  
2N16 Quarry House  
Leeds  
LS2 7UE

10 May 2018

**CAMRA response to “A Consultation on Low Alcohol Descriptors”**

Thank you for the opportunity to respond to this consultation. CAMRA is a UK consumer group with over 190,000 members that acts as the independent voice for real ale drinkers and pub goers. Our vision is to have quality real ale and thriving pubs in every community.

In answer to question one of the consultation, we broadly support the move from legislation towards guidance supported by the industry and other stakeholders. We note the success that the alcohol industry and associated organisations, such as The Portman Group and Drinkaware, have already made in encouraging responsible consumption of alcohol.

All member companies of the Portman Group aim to foster responsible drinking by having age verification on their websites and clauses in their contracts with third-party sellers regarding irresponsible marketing. Many of these drinks companies' set out their commitment to responsible alcohol consumption in their corporate social responsibility statements - for example Heineken commits 10% of its marketing budget on communicating the message of responsible drinking.

We believe that it is vital that the industry works in partnership with the Government to ensure that this process results in having both appropriate and sensitive guidance and regulation in place. The Alcohol Industry has shown itself to be adept at self-regulating, and there are strong examples of cross-organisational partnerships in this area.

We would highlight the Public Health Responsibility Deal and the subsequent alcohol unit reduction pledge. This is a strong example of government working with business, charities, and other organisations to create tangible change on alcohol consumption. This approach sought to remove 1 billion units of alcohol from the UK market by December 2015. This saw brands reduce the strength of well-known brands and introducing new lower alcohol alternative, this saw a reduction in the amount of alcohol consumed without reducing the number of drinks that they purchased, thus seeing an improvement in public health without challenging the viability of business.

Regarding questions two and three, there is clear evidence to argue for a higher ABV classification of low-alcohol beers, with all beers (and other alcohol) with an ABV at and below 2.8% being classed as low alcohol.

To set the bar at 1.2% ABV for the classification of beer low-alcohol is out of step with the Government's taxation policy - which provides a 50% reduction in the rate of duty on beers

with an ABV of 2.8% or less, which came into operation on 1st October 2011. The stated aim of this duty reduction was to “encourage the production and consumption of lower strength beers and give responsible drinkers additional choice”<sup>1</sup>.

If the government were to maintain that only beers under 1.2% ABV could be labelled as low alcohol, this would be a direct contradiction of the Government’s policy on the rate of beer duty. The Government’s policy aim of encouraging the growth of the consumption of low strength beers is severely undermined by the existing labelling regulation which prevent brewers promoting low strength beers as low strength.

The current labelling regulation is also out of step with consumer perceptions. , Research by the University of Cambridge found that the majority of participants already perceived the alcohol contents of products labelled with low alcohol descriptors as having a higher strength than the current cap of 1.2% ABV.<sup>2</sup> The median strength that participants perceived beers labelled as “low alcohol” being was 2.7% ABV, which means that current consumer expectations fit with our proposed limit of 2.8% ABV. Only beers labelled as ‘super low’ were perceived to have an ABV close to the current legislation of 1.2% ABV with participants giving them a median strength of 1.3% ABV. The current alcohol labelling for low strength alcohol is unclear and counter to consumer perceptions - a move to increase the threshold to 2.8% ABV would fit with current popular thought and enable consumers to make educated decisions.

There is also international precedent, from both within and outside of Europe, for a low alcohol descriptor being used for beers under 2.8% ABV.

The Swedish beer classification system views low alcohol beer as being either 2.2%, 2.8%, or 3.5%. Any low-alcohol beer below 3.5% ABV can be sold in an ordinary supermarket whereas any regular strength beer over 3.5% must be purchased at a Systembolaget which is government-owned. Furthermore, any beer below or equaling 2.25% ABV is not legally subject to age restrictions.<sup>3</sup> A similar system has operated in Finland, whilst no longer formally legislated, it remains widely voluntarily used and elements of it still exist in the tax system. This sees 5 different classes of beer ranging in strength - the first class (class 1) includes beers between 0.0%-2.8% are subject to a far lower tax level than stronger beers<sup>4</sup>, whilst beers over 5.5% can only be bought in a state-run liquor shop<sup>5</sup>. Another Northern European example is Norway which also operates a class system for its beers. Class A beer has an ABV of less than 0.7% and is for all intents and purposes alcohol-free beer, it is subject to the same tax level as general food stuffs and can be sold anywhere, any time, and can be bought by anyone. Class B beer has an ABV between 0.7% and 2.75% and is considered light or low-alcohol beer. This is lightly taxed and can, again, be sold anywhere, anytime, with an age limit of 18 years.

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[http://webarchive.nationalarchives.gov.uk/20130102210512/http://www.hm-treasury.gov.uk/d/alcohol\\_tax\\_review301110.pdf](http://webarchive.nationalarchives.gov.uk/20130102210512/http://www.hm-treasury.gov.uk/d/alcohol_tax_review301110.pdf)

<sup>2</sup> <https://onlinelibrary.wiley.com/doi/epdf/10.1111/bjhp.12273>

<sup>3</sup> <https://beerandbrewing.com/dictionary/AC59dSBeYm/sweden/>

<sup>4</sup> [https://www.revolv.com/main/index.php?s=Category:Beer\\_in\\_Finland](https://www.revolv.com/main/index.php?s=Category:Beer_in_Finland)

<sup>5</sup> <http://www.bbc.co.uk/news/blogs-news-from-elsewhere-36369155>

According to the Australian taxation system, low-strength beer is defined as below 3% ABV, mid-strength beer has an alcohol content of between 3 and 3.5 per cent and full-strength beer has an alcohol content of greater than 3.5 per cent.<sup>6</sup> Whereas in Canada, beers under 1.1% ABV are not subject to common names and are not required to list their alcohol content. Beers between 1.1.% and 2.5% are labelled as extra-light beers, and from 2.6-4.0% they can be labelled as light beers<sup>7</sup>.

The current low-alcohol classification cut off at 1.2% is out of step with consumer perception, international precedents and also with our own taxation system.

The upper limit for drinks to be described as low-alcohol ought to be 2.8% ABV - keeping us in line with consumer expectations, the precedent set by other nations, and our own taxation system.

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<sup>6</sup> <https://bit.ly/2FGzuEA>

<sup>7</sup> <https://bit.ly/1IXtntU>