

August 22, 2008

John Manfreda  
Administrator  
Alcohol and Tobacco Tax and Trade Bureau  
U.S. Department of the Treasury  
1310 G Street, NW  
Washington, D.C. 20220

Re: Alcohol Labeling

Dear Mr. Manfreda:

For your information, I am enclosing a copy of a recent study (“Monitoring Implementation of Alcohol Labeling Regime (including advice to women on alcohol and pregnancy)”) that examined compliance with the implementation of Britain’s voluntary alcohol labeling regime. I forward this document because its conclusions are instructive for TTB’s current consideration of regulations for the labeling of alcoholic beverages.

Although the British labeling “requirements” are voluntary, they were the result of an agreement by the alcohol industry to introduce, by the end of 2008, labels on beverage containers showing alcohol unit and other health information. A typical presentation of such a label is found on Page 5 of the study. According to the agreement with industry, the labels were to include:

- The drink’s unit content;
- The recommended Government sensible drinking guidelines: “UK Chief Medical Officers’ recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily (British “units” are smaller than an American “standard drink”)
- The website address of an independent charity, the Drinkaware Trust; [www.drinkaware.co.uk](http://www.drinkaware.co.uk) – detailing sensible drinking messages; and
- “Know your Limits” or “Enjoy Responsibly” or “Drink Responsibly” as a heading.

In addition, the label was to include a warning about drinking during pregnancy.

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Unlike the “serving facts” label proposed by TTB, the agreed-upon British label focuses on providing objective, clear information about the beverage’s alcohol content and its relationship to established levels of safe alcohol consumption. That focus on alcohol units reinforces the ability of consumers to measure and moderate their drinking.

The uncluttered “typical presentation” of the label (see p. 5 of the enclosed report) offers quite a contrast to TTB’s proposals, which include extraneous and irrelevant nutrition information (fat and protein disclosure) and fail to inform consumers of government recommendations for moderate drinking. Although TTB’s “Serving Facts” panel would require information on serving size and number of servings per container, it could, under TTB’s proposal, be totally devoid of information on alcohol content.

Confusingly, TTB’s proposed “Serving Facts” panel could express alcohol content three ways: not at all, as a percentage of alcohol by volume, or as a percentage of alcohol by volume *and* in fluid ounces of ethanol.

We do not suggest that TTB necessarily adopt the UK model for an “alcohol facts” label. We merely point out its correct emphasis on *alcohol* information, including alcohol content and guidelines for safe drinking and, compared to TTB’s proposal, its relative clarity and directness. We note that it includes a helpful link to an independent website that provides more information about “responsible alcohol consumption.” Its content, design, and “responsible drinking” elements could be adapted for American labels.

Center for Science in the Public Interest (CSPI) has previously commented that TTB’s proposal needs more work. At the very least, TTB should assure consistency among all labels and “Serving Facts” panels and add a reference to the definition of moderate drinking found in the Dietary Guidelines for Americans. Currently, it is entirely unclear that the current proposal will provide label information on alcoholic beverages that is useful, easily found and read, and comprehensible for most consumers. As far as we know, there is no legitimate, comprehensive consumer research that has tested varying forms of “Serving Facts” labels or probed consumer comprehension and attitudes regarding different information disclosures. We believe that the public would be greatly disserved by a new labeling rule that is issued hastily without adequate research and consumer testing.

According to the enclosed report, the British labeling regime is not without its problems, particularly because it has not yet been fully implemented. Nonetheless, it attempts to send the right message regarding drinking (“Know your limits,” etc.) and reinforces that “responsibility” message with clear information about safe consumption

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guidelines that will help consumers measure and moderate their drinking. In contrast, TTB's proposal and the liquor industry's advocacy of many of its elements, would serve to obfuscate and confuse when it comes to addressing the principle element of alcoholic beverages.

CSPI strongly urges that TTB delay issuing a final rule on its "serving facts" labeling proposal, pending reconsideration of its essential elements and further research that will document its effectiveness and utility for consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "George A. Hacker". The signature is fluid and cursive, with a prominent initial "G" and "H".

George A. Hacker  
Director  
Alcohol Policies Project

# **Monitoring Implementation of Alcohol Labelling Regime** (including advice to women on alcohol and pregnancy)

**June 2008**



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## Final report

# Monitoring Implementation of Alcohol Labelling Regime (including advice to women on alcohol and pregnancy)

Conducted on behalf of :  
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## **1. EXECUTIVE SUMMARY**

### **Background**

In 2004, the UK Government published an *Alcohol Harm Reduction Strategy for England*<sup>1</sup>. This, whilst recognising that alcohol plays an important and positive role in many aspects of British life, shared the public's concern that the levels of crime and disorder and the ill health caused by alcohol were unacceptable and that these should be tackled further. It is against this background that the UK Government has been working with the alcohol industry to improve the labelling of alcoholic drinks. An important output from this was an announcement, in May 2007, that the Government had secured a voluntary agreement with the alcohol industry to introduce, by the end of 2008, labels on alcoholic drink containers showing unit and other health information. In addition the Government also asked industry to include advice to women on alcohol and pregnancy.

The Government's renewed alcohol strategy *Safe, Sensible, Social - the next steps in the National Alcohol Strategy*<sup>2</sup>, published in June 2007, included a commitment to monitor the extent to which the elements of the labelling regime and the alcohol and pregnancy message have been implemented.

The Department of Health, therefore, commissioned CCFRA (Campden & Chorleywood Food Research Association) to undertake a large-scale independent market survey, carefully designed to determine the extent to which the Government's alcohol labelling agreement with industry was being followed. The results were also expected to inform the Department of Health's approach to the future control of unit and health information on alcoholic drinks.

### **Approach**

During the final two weeks of March 2008 nearly 500 samples were purchased from over 60 major supermarkets, leading convenience stores and off licenses. All product types, packaging formats and branded / own label products were represented, according to their relevant market shares.

To provide a visual archive of the products, the samples were photographed from several angles. CCFRA Food Law Advisers and others experienced in the systematic recording of information then carefully and individually assessed the label of each product. By examining up to 62 separate features, they determined to what extent the Department of Health's agreement with industry had been implemented. Their conclusions were recorded

electronically and assembled into a spreadsheet that was then used to analyse the overall findings and determine patterns or trends.

The Food Standards Agency guidance on Clear Food Labelling<sup>3</sup> was used to select the criteria to assess whether or not such information, when present, was easy to find, read and understand.

## **General conclusions**

At present sensible drinking information is being included on the labels of alcoholic drinks to a limited extent. There is a wide variety with respect to which elements are included and the way they are portrayed.

The most frequently included element was the UK units per container information. However, a number of labels also indicated the number of units per glass / per serving and in some cases the recommended sensible drinking guidelines.

Reference to the website address of the Drink Aware Trust [www.drinkaware.co.uk](http://www.drinkaware.co.uk) was also one of the most frequently occurring elements. On occasion, however, this was given as D-rinkaware which did not conform to the labelling agreement and was felt to be less helpful as it does not link directly to the website.

Often, the form of the responsibility message did not comply with the labelling agreement, i.e. 'Know your limits', 'Enjoy Responsibly' or 'Drink Responsibly'. Sometimes the word 'Please' was added. There was also a tendency for a brand or brand holder name to be incorporated, for example 'Please drink *brand name* responsibly'. Other variations that did not conform to the labelling agreement were also found.

Sensible drinking guideline information was also found to be present. This took the agreed format in only 2.4% of the samples. Alternative formats were found and these tended to differ from the agreed version with respect to the source of the information. Daily consumption guidance, when given, was consistent with the agreement, although occasionally weekly guidance, that did not comply with the agreement, was also included.

Although the Department of Health had indicated a preference for the shortened version of the pregnancy wording, this and alternative statements were little used. Where given, the presence of alcohol in pregnancy information was most frequently in the form of a pregnancy logo.

A variety of packaging formats with a similarly large range of printable areas were assessed. However, on average, only a small percentage of the total printable area (1.2%) was devoted to unit and other health information.

In addition, there did not appear to be any consistency as to the placing or format of the unit and health information, or of what elements such information should consist. Labels were seen which closely matched the examples given by the Department of Health. It did seem that certain brand holders were adopting a standard format or consistent approach for their products.

Where unit and health information was present it was usually easily visible, clearly legible and indelible. On occasion, however, such information was hidden, either by being placed on the underside of the packaging or by being placed following other information, amongst other text or on an obscure part of the label, such as the neck.

The font size frequently adjudged to have been used was 6 Point. This is small but was usually considered legible. Where it was not legible it was usually because the information was in amongst other larger text.

Poor tonal contrast was another factor which was considered to affect legibility. Examples were found where unsuitable combinations of coloured text and background were thought to have been used. The use of shiny or metallic backgrounds did not aid clarity.

Some packaging formats are multipacks which consist of both an outer and inner package. Potentially, therefore, unit and health information is available to the consumer at the point of sale and at the point of consumption. All combinations were found with information present on just the outer, just the inner, both or neither.

In conclusion, therefore, limited unit and health information and guidance is currently being made available on the label of alcoholic drinks and there are some instances where good practices are being adopted. At present, however, overall there is much inconsistency as to the unit and health information content, format and location.

The report discusses these issues further.

## 2. AIMS AND OBJECTIVES

The voluntary labelling agreement between the alcohol industry and the UK Government expects that, by the end of 2008, the majority of alcoholic drinks labels will include:

- The drink's unit content;
- The recommended Government sensible drinking guidelines "UK Chief Medical Officers' recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily";
- The website address of the independent charity, the Drinkaware Trust - [www.drinkaware.co.uk](http://www.drinkaware.co.uk) - detailing sensible drinking messages;
- "Know your Limits" or "Enjoy Responsibly" or "Drink Responsibly" as a heading.

In addition, the industry has been asked to include the short version of the alcohol in pregnancy message as agreed by the UK Chief Medical Officers - "Avoid alcohol if pregnant or trying to conceive". This is an abbreviated form of the statement "As a general rule, pregnant women or women trying to conceive should avoid drinking alcohol. If they do choose to drink, to protect the baby they should not drink more than 1 or 2 units of alcohol once or twice a week and should not get drunk".

Although the alcohol industry is not bound by the agreement to do so, the preference is for this agreed pregnancy text to be used rather than an alternative circular logo (Figure 1) in which a diagonal line is superimposed on an image of a pregnant woman holding a glass.

**Figure 1: Pregnancy logo**



A typical presentation of the information is set out at Figure 2 below:

**Figure 2: Typical presentation of unit and health information**



The objective of this project was to conduct a systematic review of the labels of alcoholic drinks available on the UK market in order to assess to what extent the voluntary labelling agreement was being implemented.

### **3. METHOD**

#### **3.1 Sampling plan**

The Department of Health's specification<sup>4</sup> sets out a number of requirements for the sampling plan, including that the products purchased for assessment:

- Were broadly representative of the various types of alcoholic drinks generally available to consumers at retail outlets for consumption off the premises;
- Embraced the full range of packaging formats used for such products;
- Were collected throughout the UK;
- Reflected the market share of own-label and branded products;
- Permitted an estimation of Alcohol by Volume (ABV) for wine and beer.

To fulfil the first two requirements, lists were developed of product types and of the packaging formats available.

The list of product types was based on information in the Department of Health tender documentation<sup>4</sup>, Market Reports<sup>5,6,9</sup> and Customs and Excise information<sup>7,8</sup>. Four main product types and twenty sub categories were identified as listed in Table 1.

From general experience of the market and by inspecting a number of home shopping websites, it was concluded that wines, spirits and flavoured alcohol beverages were predominantly supplied in glass bottles. Wines can also be supplied in wine boxes with cartons being used to a limited extent.

Beers, however, are supplied in bottles and cans which are sold both singly and in various sized multipacks. Can Makers Association data<sup>10</sup> was used to indicate the proportion of cans, bottles and the different pack sizes in which they were usually presented.

The number of samples of each product type to be purchased was based on the market share by value. The target number of samples of each product type is given in Annex 1.

**Table 1: Table of drink categories**

<b>Product type</b>	<b>Sub category 1</b>	<b>Sub category 2</b>
<b>Beers</b>		Lager
		Beer
		Stout
	Cider and Perry	
<b>Wines</b>	Light wines	
		Red
		White
		Rose
	Sparkling	
	Fortified	
		Sherry
		Port
		Vermouth
	Other	
<b>Spirits</b>	White	
		Vodka
		Gin
		Rum
	Dark	
		Whisky
		Rum
		Brandy
	Liqueurs	
<b>Flavoured alcoholic beverages</b>		

In order to obtain a representative selection, the samples were also distributed between branded and own label products. This varied for product type. For example the market share occupied by own label beers was known to be quite small, whereas own label wines and spirits comprised a greater share of the market. Data from market reports<sup>5,9,11,12,22</sup> was therefore used to identify the respective market shares for individual product types.

Lists of major branded products were assembled, again by reference to market reports<sup>13-20</sup>. In order to ensure the most representative coverage, an additional proportion was also allocated to minor brands, defined as those that were neither leading brands nor own labels.

In this way lists of branded products (major brands, minor brands) and own label products were identified for purchase.

To ensure that products were purchased throughout the UK and in a manner that was weighted according to the overall market share of the differing types and groups of retailers, retailers were divided into five types:

- National / Regional supermarket;
- National / Regional off licence;
- Independent off licence;
- Licensed convenience store (including forecourts);
- Co-op.

On the assumption that their sales of alcoholic drinks were broadly proportional to their total grocery sales, the top multiple grocery retailers were identified<sup>24,25</sup> and sample purchases allocated to each company according to their relative market share. Care was taken to visit three regionally important stores - Booths in the North-West, ScotMid Co-op in Scotland and SuperValu in Northern Ireland.

Purchases from specialist off licences were similarly calculated but according to more readily available data<sup>5</sup> on the numbers of branches operated, rather than the absolute market shares.

To ensure an appropriate geographical spread, 60 stores were visited, comprising five stores within each area served by the nine English Regional Development Agencies<sup>26</sup>, plus a further five in each of Scotland, Wales and Northern Ireland.

The final allocation of stores is given in Annex 2. Their addresses are set out at Annex 3.

The lists of alcoholic beverages previously identified were then allocated to each area and store as follows:

Each item on the list of branded (major and minor brands) and own label products, each in a variety of packaging combinations, was allocated a sequential number ranging from 1-12 and allocated to each of the twelve areas in turn. The major brands to be purchased were named. The minor brands were identified by exception, for example a bottle of branded red wine (not major brands x,y, or z).

Although branded products could be purchased from any of the stores that were listed in that area, to ensure that the own label samples were purchased as planned, they had to be purchased from the named store within that area.

In this way separate shopping lists were developed for each area.

### **3.2 Shopping**

These shopping lists were distributed via RQA Europe Limited to twelve area-based shoppers, each of whom was asked to locate and purchase the required products from 23 to 30 March 2008.

To ensure the most accurate and complete product acquisition possible, shoppers were given detailed instructions - as set out in Annex 4.

At the end of this process, 404 samples had been purchased.

Between 29 March and 1 April 2008, a number of the branded and own-label products that could not be located in the originally designated area and/or store were subsequently purchased by RQA from four on-line shopping websites or by CCFRA staff at a further fifteen stores.

As a result, the total number of samples had been increased to 490. The limited shortfall from the target of 500 was largely due to shoppers seeking to purchase product/packaging/outlet combinations that simply did not exist. Five inadvertent duplicate samples were subsequently identified and eliminated, thereby further reducing the number of samples logged to 485.

As expected, however, following detailed logging of the samples, further duplicates were also identified. These were often minor brands, where shoppers in different areas, but guided by the same negative lists of major brands, had purchased identical products and sometimes the result of inappropriate substitutions having been made by the shoppers. In addition, two breakages were not replaced as by then they fell well outside the original sampling period. Accordingly, the total number of samples used in the final assessment and subsequent data analysis was 458.

### **3.3 Sample logging**

After all the samples had been returned to CCFRA, each area was processed in turn. Samples were assigned a unique reference number and a sample ID label applied for identification purposes. This comprised a two letter code that identified each region followed by a number which was assigned sequentially as each sample was logged. Information identifying each sample was entered into an Excel spreadsheet.

As each area was completed, the data entered into the Excel spreadsheet was validated and corrected/amended as required.

### **3.4 Imaging**

As samples were logged they were also photographed. The photographers were briefed as to the requirements and, in particular, the need to capture all relevant information.

Images were checked for clarity and coverage and additional photographs taken where required. In most cases several views were necessary to provide a suitable record. Images were saved as jpeg files, using the sample ID, plus a sequential suffix (a,b,c etc) according to the number of shots taken.

### **3.5 Assessment**

Once data validation and imaging of each area's products was complete, the validated data was added to a spreadsheet of samples for all regions. At this stage also, assessment forms were generated. This was done by running an Excel macro, which used the sample data to populate a Word template. Each assessment form was saved by the macro with the sample ID as part of the document name. A blank assessment form is attached at Annex 5.

As assessment forms were generated, they were placed in a folder named 'Step 1 New Assessments'

As these forms were allocated to assessors they were moved into folder 'Step 2. In Progress';

When completed, assessments were saved with a suffix of 'C' into folder 'Step 3. Completed Assessments';

Completed assessments were then submitted to the automatic processing system and finally stored in a folder 'Step 4. Processed'.

The assessment forms were designed as protected Word forms. Bookmarks held the responses from assessors. These comprised drop-down boxes where response choices were limited to a predefined list, and free text areas suitable for capturing comments. Each fieldname or bookmark was coded to include a question reference to facilitate data analysis at the next stage.

A detailed and extensive series of criteria was developed against which to assess the samples. These were incorporated into the assessment form, generating 62 separate fields into which Assessors could record directly their conclusions.

Assessors were also asked to check the product information already contained in the assessment form as well as the related images at the beginning of each label assessment.

As indicated above, multiple choice questions were used whenever possible to ensure that the assessors adopted a consistent approach. In order further to enhance consistency, assessors were provided with comprehensive guidance notes (as described below).

The assessment form was in two parts. The first part was to be used for all single samples and the outer packaging of those products that were multipacks. The second part contained essentially the same questions but was intended to be used in the case of inner units of multipacks. The outer packaging of multipacks was treated in the same way as a single sample as this was the information available to the intending purchaser at the point of sale. It was recognised, however, that often the outer packaging is readily discarded, either for easier storage or immediate use of the individual units. The second part of the form was therefore used to assess the extent of the labelling on the inner unit, since this would normally be viewable by the final consumer.

Assessments were conducted by 11 individuals, either employed as specialist Food Law Advisers, or otherwise skilled and experienced in the systematic recording of information. Their ages ranged from 24 to 58. Ten wore prescription glasses or contact lenses for carrying out assessments.

Whilst the assessment form itself was designed to aid consistency, this was further ensured by carrying out a pilot exercise in which sets of labels were assessed by two Food Law Advisers. Any divergences of approach which arose from their conclusions were used further to develop the assessment form. In addition, this exercise was used to develop a comprehensive set of Guidance Notes for Assessors.

Before undertaking assessments the assessors were instructed on the content of the assessment form and its completion. Initial forms were then checked and the assessors further advised on any inconsistencies in their responses.

One assessor, designated as the Consultant Assessor, was available for discussion whilst the assessments were underway. Any advice given on the approach to be adopted was recorded in the Guidance Notes, which thereby further developed as the evaluations progressed and/or unusual issues were encountered. The final form of the Guidance Notes is set out at Annex 6.

Font size was measured using a Point Perfect device, comprising a series of accurately spaced hairlines set in a clear plastic flexible card. It enables the font sizes of typefaces to be measured from the top of any capital letter to the bottom of a descender i.e. a letter with a 'tail' that descends below the rest of the text such as g, j, p, or y.

Printable areas were determined using flexible scale rules capable of measuring packs of up to 30cm to an accuracy of 1mm. The printable area of each product was normally self-defining: i.e. the area that was available to be printed, but the following general principles were followed:

- Clear packaging, through which the product could be viewed, was not printable;
- For direct printing on clear packaging the total area was calculated from the horizontal (x) and vertical (y) distances between the first and last printed image or character;
- Each of the labels attached to clear packaging was regarded as printable on the consumer facing side. The areas of each separate label were calculated using the area calculator and then summed. Labels with information printed on the reverse side was regarded as having twice the normal printable area;
- Bottoms and tops of cans were regarded as not printable;
- The area taken up by printed dates and/or lot marks on otherwise unprinted areas of a package was ignored as trivially small;
- Opaque directly printed plastic packaging was regarded as printable;
- The normal form in which a pack is presented to the consumer was considered. On this basis the bottom face of tall packs was rarely, if ever, regarded as printable;
- Complicated geometric shapes were reduced or approximated to a simpler shape or series of shapes. The area calculator was then used to determine the area of each component: these figures were then summed;
- All areas used for sensible drinking information were measured, however small.

Having taken the necessary measurements from the packaging, assessors then used a separate specially developed Excel spreadsheet to calculate printable areas (Annex 7).

When batches of assessment forms were ready to be processed, they were submitted by email to an in-house autoprocessor. This bespoke system recognises Word attachments according to data coded into the Word document. It is then able to cycle through all the fields (or bookmarks) in the Word document and add the data as an additional record to the corresponding Excel spreadsheet. In this way, assessment form data was consolidated into a single Excel spreadsheet.

### **3.6 Data analysis**

The consolidated spreadsheet of assessment form responses was used for data analysis. Prior to this, the dataset was checked for duplicates. Duplicates of assessed products were removed but subsequently used to determine the likely error rate (see below).

Data in Excel was audited prior to analysis, to ensure consistency of spellings (for example of the allocated product categories), and to check interpretation of some fields (for example the response to the internal label question for multi-packs). The auditor referred to product images where appropriate.

The data was analysed primarily in Excel, using database summary functions, data filtering and Pivot Tables. Minitab<sup>27</sup> was used for the more detailed statistical analysis of significance testing and strengths of association (see 3.8 below and Annex 13).

### **3.7 Error rate determination**

As indicated above, the validation of sample logging data, the design of the assessment form, the development of guidance for its completion, and the designation of a Consultant Assessor to resolve uncertainties and divergences were all intended to reduce the likelihood that errors would arise in the final report.

During shopping a number of inadvertent duplicates had been obtained either by inappropriate shopping, product substitution or attempts to fulfil the requirements of the minor brand negative shopping lists resulting in shoppers inadvertently purchasing the same product in different parts of the country. Thus, during data analysis 17 matched pairs of duplicate samples were identified by their barcode.

Each of these products had therefore been assessed by two different assessors.

As a number of questions required the assessor to provide an opinion rather than a matter of fact, only divergences between assessments in relation to matters of fact were recorded as “errors”. So whilst the total number of fields in the assessment form was 61, of these only 15 were amenable to error. Consequently 255 fields across the 17 matched forms that had been subject to dual assessment were prone to error.

As the total number of ‘errors’ was 10, the percentage error rate could be calculated (see section 3.8.3 below) as 3.9% (95% CI 1.9%:7.1%)

An additional 3 matched pairs of duplicates had inadvertently been assessed by the same assessor (One assessor had assessed two sets of matched pairs, and another assessor had assessed one set of matched pairs). In the same way these assessment forms were used to determine the consistency of assessment by the assessors.

The total number of errors determined was 0 - indicating good consistency of assessment by individual assessors.

### **3.8 Statistical analysis**

Each sample (drink container) had a number of features:

- Type of drink;
- Branded/own label;
- Type of outlet from which purchased;
- Packaging format;
- Region in which it had been purchased;
- Country of origin;
- Printable area of its label (note that this a numerical value, while the other features are categorical, i.e. discontinuous).

The label from each sample was assessed on a number of features:

- Presence of sensible drinking information;
- Presence of unit content;
- Presence of drinking in pregnancy advice;
- Presence of a reference to the Drinkaware Trust *www.drinkaware.co.uk*.

There was interest in associations between sample and label features.

#### **3.8.1 Significance tests**

Statistical tests were used to assess whether observed associations in the set of 458 samples were convincing evidence of association in the underlying populations, or were likely to have arisen by chance sampling.

Sample features which were categorical observed associations were expressed as contingency tables showing the number of samples in each combination of sample and label categories. Where appropriate the chi-square test in Minitab was used. Where the chi-square test was inappropriate (average cell frequency less than 5 and/or any cell frequency of zero), Fisher's Exact Probability test was used. For two by two contingency tables, Fisher's test was performed in Minitab. For larger contingency tables, Fisher's test was performed using the `Fisher.test` function in R<sup>28</sup>.

### 3.8.2 Strength of association

For sample features which were categorical, strength of association was estimated by the Goodman-Kruskal tau statistic, which takes values between zero (no association) and one (perfect association).

### 3.8.3 Proportions and confidence intervals

In the results and discussions set out in this report, where importance is often placed on proportions (such as 43% of labels include unit information) confidence intervals have been estimated on the proportion. For example "43.0% (197 out of 458 95% CI 38.4%:47.7%)" indicates that the proportion observed in the survey was 43.0%, but the corresponding proportion in the underlying population could, quite credibly, be anywhere between 38.4% and 47.7%.

The survey was based upon market share by value. However, the composition of the survey sample set differed from market composition both intentionally (by re-weighting from the relatively homogenous 'lagers' to more heterogeneous 'wines') and inadvertently as the sampled proportions did not exactly match market share. "Reweight" factors were calculated for each product type and for each label type (branded or own label), equal to the ratio between market share and share in the sample. Annex 8 contains tables showing the market and sample shares for each product type and label type and the calculated reweight factors.

Some reported proportions have been corrected to market share values by weighting observations by the reweight factors, resulting in market related statements such as "3.5% of the market (95%CI 2.0%:5.6%)". Such statements generally follow closely after sample related statements described in the first paragraph of this subsection. The confidence intervals in market related statements have been calculated by multiplying the bounds in the sample related statements by the ratio between the market corrected proportion and the proportion based on the sample; this effectively neglects any uncertainty in the composition of the market.

### 3.8.4 Caveats

Two generally applicable caveats are:

- **Absence of evidence is not evidence of absence.** Absence of a statistically significant test of association does not prove the absence of an association; just that any underlying associations were too small to be confidently detected with the number of samples and the procedures used;
- **Association is not causation.** Association does not prove cause and effect. For example, several effects may be the result of a single cause, leading to an association between the effects. This does not mean that the effects cause each other; indeed any underlying cause may be unrecorded.

## **4. RESULTS AND DISCUSSION**

A summary of the product details of the 458 assessed products is available either in printed format or as an Excel spreadsheet.

The results will be discussed with respect to six main areas of investigation:

1. Unit and health information elements;
2. Multipack samples;
3. Printable area on pack;
4. Grouping of information;
5. Clarity of information;
6. Evidence and strengths of association.

### **4.1 Unit and health information elements**

This section considers each aspect of the Department of Health voluntary labelling agreement with industry and summarises the extent to which labels that were assessed followed that agreement, and draws some conclusions.

The Department of Health's voluntary agreement with the alcohol industry requires that the following elements should be present on the labels of alcoholic beverages:

- “Know Your Limits” or “Enjoy Responsibly” or “Drink Responsibly” as a heading;
- The drink's unit content;
- The recommended government sensible drinking guidelines: “UK Chief Medical Officers recommend men do not regularly exceed 3-4 units daily, and women 2-3 units daily”;
- The website address of the independent charity, the Drinkaware Trust - *www.drinkaware.co.uk*;
- The preferred pregnancy statement “Avoid alcohol if pregnant or trying to conceive” rather than the alternative - The pregnancy logo.

#### 4.1.1 Know your limits

##### *Findings*

3.1% (14 out of 458 samples, 95% CI 1.7%:5.1%) included this element on the labels.

When adjusted to market share values 3.5% (95% CI 1.9%:5.8%) of the market included this element on the labels.

Of these 14 samples:

- All had a UK brand holder;
- 8 used the words within a heading.

Within the products sampled:

- None of the 221 wine samples or 17 flavoured alcoholic beverages contained this element;
- 6 out of 95 samples of spirits contained this element, 5 as a heading;
- 8 out of 111 samples of beers contained this element, of which 3 used the term as a heading.
- 1.9% (7 of 372 samples 95%CI 0.8%:3.8%) of the branded and 8.1% (7 of 86 samples 95%CI 3.3%:16.1%) of the own label products contained this element.

Although the evidence of association between branded / own label products and “Know your limits” element is significant at the 95% level (Annex 13), the strength of association is weak.

#### 4.1.2 Enjoy responsibly

##### *Findings*

10% (46 out of 458 samples, 95% CI 7.4%:13.2%) included this element on the labels.

When adjusted to market share values 10.8% (95% CI 8.0%:14.2%) included this element on the labels.

Of these 46 samples:

- 6 samples used the words within a heading.

Within the products sampled:

- All drink types included this element to varying extents;
- 23 out of 119 samples of beers contained this element, of which 4 used the term as a heading;
- None of the 4 samples of flavoured alcoholic beverages and 7 samples of spirits which carried this element did so as a heading;
- 12 out of 221 samples of wines included this element, of which 2 did so as a heading.
- 11.8% (44 out of 372 samples 95% CI 8.7%:15.6%) of the branded products and 2.3% (2 out of 86 samples 95% CI 0.3%:8.2%) of own label products contained this element.

#### 4.1.3 Drink responsibly

##### *Findings*

8.5% (39 out of 458 95% CI 6.1%:11.5%) of samples included this element on the labels.

When adjusted to market share values 8.5% (95% CI 6.1%:11.4%) of the market included this element on the labels.

Of the 39 samples that included this element:

- 6 used the element within a heading.

Within all products sampled:

- All drink types included the element Drink Responsibly to varying extents, but neither the wines nor flavoured alcoholic beverages included it as a heading.

Annex 13 indicates that there is no statistically significant evidence of an association between major product type and the Drink Responsibly element.

- Overall 9.6% (36 out of 372 95% CI 6.9%:13.2%) of branded products and 29% (25 out of 86 95% CI 19.8:39.9%) of own label products used the element Drink Responsibly;
- None of the own label samples used Drink Responsibly as a heading;
- Of the branded products 6 out of 36 samples used this element as a heading.

Again Annex 13 indicates that there is no statistically significant evidence of an association between branded / own label and the Drink Responsibly element.

#### 4.1.4 Alternative responsibility statements

Enjoy Responsibly, Drink Responsibly - Alternative wording that does not comply with the labelling agreement

##### *Findings*

The exact terms “Enjoy Responsibly” and “Drink Responsibly” were not always used - a number of variations, that did not comply with the labelling agreement, were employed. Details of these are listed in Annex 9.

22.5% (103 out of 458 95% CI 18.7%:26.6%) of samples used an alternative phrase.

When adjusted to market share values 23.1% (95% CI 19.2%:27.3%) used an alternative phrase.

Such phrases often took the form of a request, e.g. “Please drink responsibly”, and/or introduced a brand name, e.g. “Please enjoy/drink *brand name* responsibly”.

Of these 103 samples:

- 33.0% (34 out of 103 95% CI 24.1%:43.0%) used a phrase of the type Please drink/enjoy/savour responsibly/sensibly / at all times;
- 37.9% (39 out of 103 95% CI 28.5%:47.9%) used such a phrase but incorporating the brand / own label name;
- Other messages referred to:
  - Drinking and Driving (7%);
  - Being a member of a group supporting responsible drinking (5%);
  - Not selling to under 18s (2%).

Within the products sampled:

- 32 out of 119 beers contained an alternative phrase. Of these approximately the same numbers used a Drink Responsibly message and a Drink Responsibly message incorporating the brand name;
- 2 out of 17 flavoured alcoholic beverages - one of each type of message, of these one incorporated the brand name, the other did not;
- 30 out of 101 spirits included an alternative phrase. The majority (16 samples) referred to drink responsibly, 8 included the brand name and 5 referred to drinking and driving;
- 39 out of 221 wines included an alternative phrase, the majority of which incorporated the brand name (22 samples); 2 samples referred to drinking and driving.
- Overall 29.1% (25 out of 86 samples 95% CI 19.8%:39.6%) of own label products and 24.2% (90 out of 372 95% CI 19.9%:28.9%) of branded products contained an alternative phrase. Only 3 of the own label samples referred to the brand holder in the alternative phrase.

#### 4.1.5 Units per container

##### *Findings*

43% (197 out of 458 95% CI 38.4%:47.7%) of samples gave information relating to unit content per container.

When adjusted to market share values 44.6% (95% CI 39.8%:49.4%) of the market gave information relating to unit content per container.

As can be seen from the Table of Associations (Annex 13) there is significant evidence of association between Units per container information and each of the factors - Brand holder country, Major product type, Packaging format and Country of origin.

Within the products sampled, units per container information was present on:

77 out of 119 beers	64.7%	95%CI 55.4%:73.2%
11 out of 17 flavoured alcoholic beverages	64.7%	95% CI 38.3%:85.8%
53 out of 101 spirits	52.5%	95% CI 42.3%:62.5%
56 out of 221 wines	25.3%	95% CI 19.7%:31.6%

Wines would appear to contain the unit per container information less frequently than the other product types.

The relationship between units per container information and branded / own label was not found to show significant evidence of association.

#### 4.1.6 Units per glass/serving

##### *Findings*

19.2% (88 out of 458 samples 95% CI 15.7%:23.1%) of samples contained information on the number of units per glass / serving.

Within the product sample this was present on:

- 13 out of 119 beers 10.9% 95% CI 5.9%:17.9%
- 1 out of 17 flavoured alcoholic beverages 5.9% 95% CI 0.1%:28.7%
- 25 out of 101 spirits 24.8% 95% CI 16.7%:34.3%
- 49 out of 221 wines 22.2% 95% CI 16.7%:28.2%

Spirits and wines would appear to contain unit per glass or serving information more frequently than the other product groups. This is to be expected as both spirits and wines are normally consumed per glass / serving, whereas beers and flavoured alcoholic beverages are more usually consumed by the container.

However, although the evidence of association between major product type and units per glass is statistically significant at the 95% level, the strength of this association is weak.

Overall there appeared to be a large difference in the inclusion of this information on branded and own label products as only 7.5% (28 out of 372 95% CI 5.1%:10.7%) of branded products contained unit information per glass whereas this information was present on 70.9% (61 out of 86 95% CI 60.1%:80.2%) of own label products.

Accordingly, from the Table of strengths of association there is statistically significant evidence of an association between branded / own label products and unit per glass information.

On some products it was claimed that 1 unit = 10ml alcohol.

#### 4.1.7 Combined units per container and units per glass

##### *Findings*

##### *4.1.7.1 Units per glass but not units per container:*

51 of the 261 products which did not contain information on units per container, did contain information relating to units per glass and there were clear differences amongst product types.

Of these 51 samples:

- None of the Flavoured Alcoholic beverages contained this information.
- 3 samples were beers
- 12 samples were spirits
- 36 samples were wines

A greater proportion of wines than other major product types gave information on units per glass. Of these all were light or sparkling wines. None were fortified wines.

Again the result for wines is to be expected as wines are usually consumed per glass.

#### 4.1.7.2 *Units per glass and units per container*

Of the 88 samples that did contain information relating to units per glass, 37 also contained information relating to units per container.

Of these 37 samples:

- 10 samples were beers
- 1 sample was a flavoured alcoholic beverage
- 13 samples were spirits
- 13 samples were wines

In this case spirits and wines included this information to a similar extent and to a greater extent than did beers or flavoured alcoholic beverages. Similarly both wines and spirits are usually consumed per glass.

Although the majority of the wines were again light and sparkling wines (11 samples), 1 sample of Sherry and 1 of Port also contained both items of information.

In the case of Spirits this related mostly to Whisky (7 samples) but also to Brandy and Vodka (2 samples each), Gin and White Rum (1 sample each)

#### 4.1.8 Recommended Government sensible drinking guidelines

The recommended Government sensible drinking guidelines element of the labelling agreement is:

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

#### *Findings*

2.4% (11 out of 458 95% CI 1.2%:4.3%) of samples contained the sensible drinking guideline as included in the labelling agreement.

When adjusted to market share values 2.6% (95% CI 1.2%:4.2%) of the market included the agreed sensible drinking guideline element.

Of these 11 samples:

- All were products of UK brand holders and the country of origin was also UK
- 4 were own label products (1 brand holder)
- All were spirits or beers
- A variety of packaging formats were included - cans, bottles and multipacks

There is statistically significant evidence of an association between the presence of the agreed sensible drinking guideline element and the country of origin (UK or non-UK) and with the major product type; however, the strength of these associations is weak.

The 11 products which contained the sensible drinking guidelines according to the labelling agreement also incorporated other elements in accordance with the agreement:

- The elements were presented clearly within a well defined area / table and also included:
  - Know your limits
  - Unit information
  - *www.drinkaware.co.uk*
  - Pregnancy statement (5 samples) or logo (6 samples). (On 3 occasions this was separate but adjacent to the other information).

#### 4.1.9 Alternative health and unit information guidelines that do not comply with the labelling agreement

##### *Findings*

11.8% (54 out of 458 95% CI 9.0%:15.1%) of samples contained alternative sensible drinking guidelines which did not match the labelling agreement but tended to be a variation of the above. Details of these alternative phrases are given in Annex 10.

When adjusted to market share values 13.1% (95% CI 10.0%:16.8%) of the market contained alternative sensible drinking guidelines.

In summary the alternative information differed with respect to the source of advice which was given as being variously:

- UK Government;
- Official figures;
- UK Health Departments;

- Guideline Daily Amounts;
- UK guidelines;
- Responsible drinkers.

The information relating to the daily unit guidelines was consistent with that recommended by the Chief Medical Officers. However, in some cases weekly guidelines, which do not comply with the labelling agreement, as well as daily guidelines were given. Where present, the guidelines tended to be in tabular form although not necessarily in a defined table.

Within the products sampled:

- None of the flavoured alcoholic beverages contained any such alternative guideline;
- An alternative guideline was present on:
  - 17 out of 119 beers;
  - 12 out of 101 spirits;
  - 25 out of 221 wines.

Overall with respect to the branded / own label products, the presence of alternative guidelines is more prevalent (chi-square  $p < 0.001$ ) on the labels of own brand (37.2% 32 out of 86 samples 95% CI 27.0%:48.3%) than branded products (5.9% 22 out of 372 95% CI 3.7%:8.8%). This probably reflects the higher proportion of UK-based brand holders of own label product as opposed to branded products.

4.1.10 Website address *www.drinkaware.co.uk*

#### *Findings*

32.5% (149 out of 458 95% CI 28.3%:37.0%) of all samples contained the reference to the Drinkaware Trust.

A number of samples used the reference *D-rinkaware.co.uk* Although this is a recognised format for this organisation it was not the version in the labelling agreement.

When adjusted to market share values 34.7% (95% CI 30%:39%) of the market contained the reference to the Drinkaware Trust.

Within the products sampled:

All drink types referred to this information to varying degrees:

- 67 out of 119 beers 56.3% 95% CI 46.9:65.3%
- 5 out of 17 flavoured alcoholic beverages 29.4% 95% CI 10.3%:56.0%
- 32 out of 101 spirits 31.7% 95% CI 22.8%:41.7%
- 45 out of 221 wines 20.4% 95% CI 15.3%:26.3%

There is statistically significant evidence of an association between major product types and the website address *www.drinkaware.co.uk*.

There is no statistically significant evidence of association between branded / own label and the inclusion of the website address *www.drinkaware.co.uk*.

#### 4.1.11 Avoid alcohol if pregnant or trying to conceive statement

##### *Findings*

2.0% (9 out of 458 95% CI 0.9%:3.7%) of all samples contained the preferred wording - "Avoid alcohol if pregnant or trying to conceive".

When adjusted to market share values 2.2% (95% CI 1.0%:4.1%) of the market contained the recognised pregnancy statement.

- This was found on 5 light wines and 4 spirits;
- All of these products were own label.

There is statistically significant evidence of association between the pregnancy wording and branded / own label; however, the strength of the association is weak.

#### 4.1.12 Alternative alcohol in pregnancy statements that do not comply with the Chief Medical Officers' Advice

##### *Findings*

2.2% (10 out of 458 95% CI 1.1%:4.0%) of all samples contained different pregnancy advice and details of these are given in Annex 11.

When adjusted to market share values 2.7% (95% CI 1.3%:4.8%) of the market contained different pregnancy advice.

- This was found on 5 wines, 4 spirits and 1 beer;
- The majority (8 out of 10) were own label lines.

#### 4.1.13 Alcohol in pregnancy logo

##### *Findings*

14.4% (66 out of 458 95% CI 11.3%:17.9%) of samples contained the pregnancy logo.

When adjusted to market share values 13.1% (95% CI 10.3:16.3%) of the market contained this logo.

- This logo was found on 10 beers, 5 spirits and 51 wines;
- This logo was not present on any of the flavoured alcoholic beverages;
- The majority of products containing the pregnancy logo were branded lines.

When considering the country of origin:

- Of those samples which included the pregnancy logo it was found most frequently on those samples originating from Australia (27.3% - 18 out of 66 samples 95% CI 17%:39.6%), followed by France (18.2% - 12 out of 66 samples 95% CI 9.8%:29.6%) and the UK (15.2% - 10 out of 66 samples 95% CI 7.5%:26.1%)

In terms of brand holder country:

- Of those samples which included the pregnancy logo it was most frequently used in those samples where the brand holder was from the UK (63.6% - 42 out of 66 samples, 95% CI 50.9%:75.1%), followed by France (16.7% - 11 out of 66 samples, 95% CI 8.6%:27.9%) and Italy (7.6% - 5 out of 66 samples, 95% CI 2.5%:16.8%).

Although there is statistically significant evidence of association of the presence of the Pregnancy logo with Country of Origin and with brand holder country, Annex 13 shows that the strength of this association is weak.

#### 4.1.14 No unit or health information elements present

32.3% (148 out of 458 95% CI 28.0%:36.8%) of the samples assessed contained no unit or health information.

This was determined by identifying those products which had all negative responses to questions on the assessment form relating to the presence of elements of unit or health information.

When adjusted to market share values, 30.3% (95% CI 26.3%: 34.5%) of the market has no unit or health information present.

Of the 148 products that had no unit or health information elements:

- 21 were Beers
- 4 were Flavoured Alcoholic Beverages
- 29 were Spirits
- 113 were Wines

Within product groups therefore 17.6% (21 out of 119) of beers, 23.5% (4 out of 17) of flavoured alcoholic beverages, 28.7% (29 out of 101) spirits and 42.5% (94 out of 221) of wines did not contain any unit or health information.

Of these 148 samples, 88 had a UK-based brand holder. The country of origin was given as the UK in 22 cases.

#### 4.1.15 ABV distribution and unit calculation

The average ABV was assessed for wines and beers and the results are given in Annex 14.

In addition the accuracy of the unit of alcohol stated in relation to the given ABV was also assessed (Annex 14). Where the units per container were declared, agreement to within 0.1 units was found in all except 9 instances.

## 4.2 Multipack samples

Certain packaging formats consist of both an outer and an inner label. It is possible therefore that in this situation different information may be seen by the purchaser at the point of sale and by the final consumer.

69 of the 458 samples assessed had an internal label.

These were analysed for the presence of certain pieces of information to determine if the information was provided on the outer label only, inner label only, both or neither.

#### 4.2.1 Units per container

##### *Findings*

31.8% (21 out of 69 95% CI 20.1%:44.4%) provided units per container information on both the outermost and the internal label.

24.6% (17 out of 69 95% CI 15.1%:36.5%) of the samples with internal labelling contained no units per container information on either the outermost or innermost label.

Of these 69 samples:

- 45 did not supply unit per container information on the outermost packaging, but 28 of these did supply the information on the inner label that would normally be visible at the point of consumption;
- In only 3 cases was the unit per container information made available on the outermost packaging but not repeated on the internal label
  - One was a keg, where it could be argued that the internal label was not intended to be seen as the product was designed to be dispensed from the outer packaging;
  - The second was a “shots” product where the internal label area was small.
  - The third sample was a multipack 6 or fewer bottles of sparkling wine. The internal printable area was 53.2cm<sup>2</sup>. The internal label did contain the pregnancy logo.

#### 4.2.2 Responsible drinking elements

##### *Findings*

Samples were analysed with respect to responsible drinking message being on the outermost label, whether by the presence of “Know your Limits” and/or “Enjoy Responsibly” and/or “Drink Responsibly” and/or an alternative responsibility statement.

In all samples, 41.3% (189 out of 458 95% CI 36.7:45.9) carried some kind of responsible drinking message.

Of the 69 samples which contained an internal label:

- 25 (36.2% 95%CI 25.0%:48.7%) had a responsible drinking message on both the outermost and internal label;
- 24 (34.9% 95% CI 23.7%:47.2%) had no responsible drinking message in either location.

Of the remainder:

- 13 samples had a responsible drinking message on the internal label only (i.e. at the point of consumption);
- 7 had a responsible drinking message on the outermost label only (i.e. at the point of sale).

#### 4.2.3 Sensible drinking element

##### *Findings*

This element, in any format, was present on far fewer samples than the “Responsible drinking” element.

In all samples, 14.2% (64 out of 458 95% CI 10.9%:17.5%) had some kind of sensible drinking guideline.

Of the 69 samples which contained an internal label:

- Only 9 (13% 95% CI 6.1%:23.3%) had a sensible drinking guideline on both the outermost and internal label;
- 59 (8.5% 95% CI 74.9:92.8) had no sensible drinking guideline in either location;
- The remaining sample had a sensible drinking guideline on the internal label only and not on the outer packaging.

#### 4.3 Printable area on pack

##### *Findings*

The available printable area varied greatly amongst different pack types (17.8 - 3510 cm<sup>2</sup>).

Where sensible drinking information was present, the area on pack used for this information varied from 0.1 - 60 cm<sup>2</sup>, 0.1% - 11.6% of the total printable area. Based on the outermost shelf readable packaging only, the overall average is 1.2% of printable area devoted to sensible drinking information.

A large available print area did not necessarily relate to a greater area used for sensible drinking information:

- Those six samples with the largest available printable area (Greater than 3000 cm<sup>2</sup>) devoted between 0 - 0.4% to sensible drinking information. These were multipacks of branded lager or cider;
- The sample devoting the greatest percentage area to sensible drinking information had a total printable area of 129.2cm<sup>2</sup>, of which 11.6% was devoted to sensible drinking information. This was a bottle of own label white wine.

The tables below indicate the average percentage of printable area devoted to sensible drinking information related to packaging type and major drink type.

**Table 2: Average printable area devoted to sensible drinking information according to packaging type**

Package type	Average of percentage printable area
Bottle	1.3%
Can	1.1%
Keg	0.2%
Multipack (<=6) Bottle	0.7%
Multipack (<=6) Can	1.0%
Multipack (>6) Bottle	0.3%
Multipack (>6) Can	0.4%
Wine box	0.3%
All products	1.2%

**Table 3: Average printable area devoted to sensible drinking information according to major drink type**

Major drink type	Average of percentage area
Beers	0.8%
Flavoured alcoholic beverages	0.6%
Spirits	1.7%
Wines	1.2%
All products	1.2%

#### 4.4 Grouping of information

The preferred format for the Sensible drinking information is that it should be grouped together within a defined border, on a single face, and within the same field of vision.

##### *Findings*

Where sensible drinking information was present:

- 5.8% (17 out of 295 95% CI 3.4%:9.1%) of samples were considered to have included information within a defined border. Of these 11 were own label products, whilst 6 were branded;
- Where 2 or more items were present 91.7% (265 out of 289 95% CI 87.9%:94.6%) included this information on the same face;
- 15.7% (39 out of 249 95% CI 11.3%:20.8%) of samples included information that was not in the same field of vision.

#### 4.5 Clarity of information

Where present, the sensible drinking message, alcohol in pregnancy message/logo and unit content were to be easily visible, clearly legible, indelible, and not hidden, obscured or interrupted with other written or pictorial matter.

##### *Findings*

##### 4.5.1 Easily visible

23.5% (72 out of 307 95% CI 18.8%:28.6%) of samples were considered to contain information which was not easily visible. Various reasons were given for this and are listed in Annex 12. In summary poor visibility was related to:

- Being hidden - underneath the product
- Poor positioning - at the bottom of a list of other information, positioned sideways when other information was horizontal, or interspersed with other information.
- Small font size - 6 point or less
- Poor tonal contrast - between text and background

#### 4.5.2 Clearly legible

13.8% (42 out of 305 95% CI 10.1%:18.2%) of samples were considered to have information which was not clearly legible. From the assessors' comments this was associated with font size, tonal contrast and shiny surfaces.

#### 4.5.3 Hidden

9.3% (28 out of 302 95% CI 6.3%:13.1%) of samples were considered to have information which was hidden.

- Where samples were multi packs this tended to refer to information being printed on the underside of packs;
- Where samples were bottles or cans this tended to refer to information being placed amongst other information.

#### 4.5.4 Obscured/interrupted

5.3% (16 out of 303 95% CI 3.0%:8.4%) were considered to have information which was obscured.

21.5% (64 out of 298 95% CI 17.0%:26.6%) were considered to have information which was interrupted with other written or pictorial matter.

The factors affecting clarity most commented on by assessors are given in Table 4:

**Table 4: Factors affecting clarity**

Factor affecting clarity	Occurrence		
Small font sizes (<=6pt)	36.6%	64 out of 175	95% CI 29.4%:44.2%
Poor tonal contrast	26.3%	35 out of 133	95% CI 19.1%:34.7%
Indistinct numerals	11.5%	10 out of 87	95% CI 5.7%:20.1%
Metallic shiny surfaces	8.1%	10 out of 124	95% CI 3.9%:14.3%

## 4.6 Evidence and strengths of association

Annex 13 sets out the evidence and strengths of associations for a number of samples and label features. Whilst a number of features would appear to have significant associations (P value of 0.05 or less) the strength of such associations in most cases is low.

The strongest association would appear to be between branded / own label products and the presence of unit per glass information.

Since this inclusion of sensible drinking information is a voluntary agreement within the UK, it was thought possible that there would be an association between the brand holder country and/or the country of origin and the presence of sensible drinking information.

### 4.6.1 Brand holder country

From the table of association information there would appear to be a statistically significant evidence of association between the brand holder country and most major items of sensible drinking information. However, the strength of this association is weak.

#### *Findings*

On examining this further:

- |                     |   |
|---------------------|---|
| “Know your limits”  | - All samples that contained this statement were from the UK  |
|                     | - It was present on 3.1% (14 out of 458 95% CI 1.7%:5.1%) of all samples compared to 4.0% (14 out of 349 95% CI 2.2%:6.6%) of UK brand holder samples.  |
| “Enjoy Responsibly” | - Present on 10.0% (46 out of 458 95% CI 7.4%:13.2%) of all samples compared to 11.8% (41 out of 349 95% CI 8.6%:15.6%) of UK brand holder samples.     |
| Units per container | - Present on 43.0% (197 out of 458 95% CI 38.4%:47.7%) of all samples compared to 49.6% (173 out of 349 95% CI 44.2%:55.0%) of UK brand holder samples. |

#### 4.6.2 Country of origin

There was evidence of a number of statistically significant associations related to country of origin but the strongest association was related to units per container information.

##### *Findings*

Units per container - Present on 43.0% (197 out of 458 95% CI 38.4%:47.7%) of all samples compared to 67.3% (105 out of 156 95% CI 59.4%:74.6%) of those samples where the country of origin is UK.

## 5. CONCLUSIONS

### 5.1 Summary of uptake of unit and health information elements on labels

Table 5 below summarises the uptake of the key elements to be included on the labels of alcoholic beverages as set out in the labelling agreement (based on the outermost label).

**Table 5: Inclusion of unit and health information on all 458 assessed samples\***

	Included as a heading	Included but not as a heading	Included (Total)	Not included	Uptake (sample)	Uptake (Market adjusted)
“Know your limits”	8	6	14	444	3.1%	3.5%
“Enjoy responsibly”	6	40	46	412	10.0%	10.8%
“Drink responsibly”	6	33	39	419	8.5%	8.5%
Different responsibility statement used			103	355	22.5%	23.0%
<i>Any slogan or statement</i>			192	266	41.9%	43.4%
UK units per container			197	261	43.0%	44.6%
UK units per glass			88	378	19.2%	21.7%
<i>Any UK units information</i>			249	209	54.4%	57.0%
Agreed sensible drinking guidance			11	447	2.4%	2.6%
Different sensible drinking guidance			54	404	11.8%	13.1%
<i>Any sensible drinking information</i>			65	393	14.2%	15.7%
<i>www.drinkaware.co.uk</i>			149	309	32.5%	34.7%
Pregnancy statement			9	449	2.0%	2.2%
Different pregnancy statement			10	448	2.2%	2.7%
Pregnancy logo			66	392	14.4%	13.1%
<i>Any pregnancy information</i>			85	373	18.6%	17.9%
<i>Any unit or health information of any kind</i>			310	148	67.7%	69.7%

\* Based on outermost label

The final column gives the percentage adjusted for the market.

It also gives an indication of the overall inclusion of unit and health information - including that other than as set out in the labelling agreement (in italics).

From the above table there is no substantial difference between the sample based proportions and the market share proportions.

## **5.2 Most commonly occurring elements**

Not including the overall summary information, the most commonly included elements were:

- UK units per container information;
- Reference to the Drinkaware trust *www.drinkaware.co.uk*;
- Some form of responsibility statement;
- The pregnancy logo.

Combinations of key labelling elements were also examined:

- The most common combination of information was units per container and units per glass (37 out of 458 samples);
- The most common combination of text and data was “Enjoy Responsibly” and information on units per container present in combination in 36 out of 458 samples.

## **5.3 Alcohol in pregnancy**

The pregnancy logo appeared to be the more common form of pregnancy information. There was limited inclusion of the pregnancy statement.

## **5.4 Presentation of unit and health information elements**

There did not appear to be consistency on the presentation, form or content of the information although some individual brand holders do appear to be adopting a standard approach.

Where unit and health information was present it was mostly considered by the assessors to be easily visible, clearly legible and indelible. However, instances were found where such information was considered to be hidden (either by being placed on the bottom/underside of the packaging, or placed underneath or amongst other information). Other comments by the assessors referred to the use of small font sizes ( $\leq 6$ pt), and poor tonal contrast between the background and text, sometimes coupled with the use of metallic or shiny surfaces. It was also commented that unit and health information was present in a smaller font or different orientation to other advertising or standard information.

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## **8. ANNEXES**

- 1 Target and assessed sample numbers
- 2 Allocation of stores by geographical area
- 3 Store addresses
- 4 Instructions for shoppers
- 5 Alcohol labelling assessment form
- 6 Guidance notes for assessors
- 7 Calculating printable area
- 8 Reweight factors for market and sample distribution
- 9 Alternative responsibility statements
- 10 Alternative health and unit information guidelines
- 11 Alternative alcohol in pregnancy statements
- 12 Clarity issues
- 13 Evidence and strengths of association
- 14 ABV distribution and unit information

## ANNEX 1

## Target and assessed sample numbers

Product type	Sub category	Target Number per product	Target Number of samples per sub category	Actual number of samples assessed
<b>Beers</b>		<b>120</b>		<b>102</b>
	Lager		95	73
	Beer		20	24
	Stout		5	5
	Cider and Perry	<b>15</b>		<b>17</b>
<b>Wines</b>		<b>240</b>		<b>221</b>
	<i>Light wines</i>		201	189
	Red		92	81
	White		97	95
	Rose		10	12
	Sparkling		23	20
	<i>Fortified</i>			
	Sherry		5	4
	Port		3	2
	Vermouth		3	1
Other		5	4	
<b>Spirits</b>		<b>110</b>		<b>101</b>
	<i>White</i>			
	Vodka		25	23
	Gin		11	9
	Rum		5	6
	<i>Dark</i>			
	Whisky		43	40
	Rum		3	3
	Brandy		10	9
	Liqueurs		13	11
<b>Flavoured Alcoholic beverages</b>		<b>15</b>		<b>17</b>
		<b>500</b>		<b>458</b>

## ANNEX 2: Allocation of stores by geographical area

(Percentages may not add up to 100 due to rounding)

	NE	NW	York/Humber	E Midlands	W Midlands	London	SE	SW	E England	Scotland	Wales	NI	total	% Visited within category
<b>National/Regional Supermarket</b>														
Tesco	1	1	1	1		1		1	1	1		1	9	23%
Asda	1	1				1	1	1	1	1			6	15%
Sainsbury				1	1		1		1		1	1	6	15%
Morrisons				1	1				1	1	1		4	10%
M&S			1			1							2	5%
Iceland				1									1	3%
Dunnes / SuperValu								1	1			1	1	3%
Waitrose											1		2	5%
Budgens				1									2	5%
Somerfield													1	3%
Aldi	1								1				1	3%
Netto													1	3%
Lidl					1								1	3%
Booths			1										1	3%
<b>total</b>													<b>38</b>	<b>96%</b>
<b>National/Regional Off Licences</b>														
Threshers (inc. Victoria Wines etc)				1	1	1				1			4	50%
Oddbins							1						1	13%
Booze Buster	1												1	13%
Majestic Wine									1				1	13%
Winemark												1	1	13%
<b>total</b>													<b>8</b>	<b>102%</b>
<b>Independent Off Licence</b>														
<b>total</b>		1	1					1				1	4	100%
<b>Licensed Convenience Store</b>														
Sparr.														
Londis												1	1	14%
Best one/Best way			1										1	14%
Cost Cutter						1							1	14%
Nisa Today													1	14%
Forecourt - BP											1		1	14%
Forecourt - Shell							1						1	14%
<b>total</b>													<b>7</b>	<b>98%</b>
Co-op					1					1			3	100%
<b>Category</b>														<b>% of Total Stores</b>
Supermarkets														<b>38</b>
Off Licences														<b>8</b>
Independent Off Licence														<b>4</b>
Convenience Store														<b>7</b>
Co-Op														<b>3</b>
<b>TOTAL VISITED</b>														<b>60</b>
														<b>100%</b>

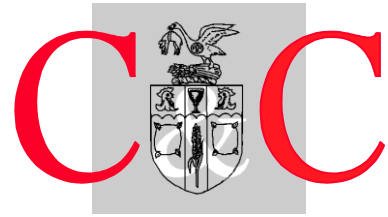
## ANNEX 3: Store addresses

Region	Location	Store name	Address	Postal code	
<i>NE England</i>	Gateshead	Tesco	Gateshead, Tyne and Wear	NE8 1BU	
		Asda	Metro Retail Park, Gibside Way,	NE11 9YA	
		Aldi	Metro Retail Park, Gibside Way,	NE11 9XG	
		Booze Buster	Elite Buildings, Stanley, County Durham	DH9 0NS	
		Nisa Today	Bensham News, Gateshead, Tyne and Wear	NE8 1UT	
<i>NW England</i>	Liverpool	Tesco	Allerton Rd, Liverpool	L18 6HF	
		Asda	Utting Ave, Liverpool	L4 9XU	
	Knutsford	Booths	Stanley Road, Knutsford, Cheshire	WA16 0BS	
		Indep Off Licence	Freshway, 29, Hatton Garden, Liverpool	L3 2EZ	
<i>Yorkshire &amp; Humberside</i>	Scarborough	Londis	Southport Rd, Bootle	L20 0DX	
		Tesco	Westwood, Scarborough	YO11 2PN	
		M&S	8 Newborough, Scarborough	YO11 1NA	
		Somerfield	16 Station Avenue, Scarborough	YO14 9AQ	
		Indep Off Licence	Sunset Wines, 66 Victoria Road, Scarborough	YO11 1SF	
	Co-op	44-46 Newlands Park Drive, Scarborough	YO12 6DJ		
<i>E Midlands</i>	Nottingham	Tesco	Unit 4, Carlton Square, Carlton, Nottingham	NG4 3BP	
		Sainsbury	Castle Marina Park, Castle Bridge Road, Nottingham	NG7 1EE	
		Iceland	6-12 Long Row, Carlton Hill, Nottingham	NG4 1JD	
		Somerfield	Sherwood Road, Sherwood	NG5 2GE	
		Threshers	Tudor Square, West Bridgford	NG2 4FD	
	<i>W Midlands</i>	Birmingham	Sainsbury	1059 Alcester Road, Maypole	B14 5TN
			Morrisons	Stratford Road ,Shirley	B90 3AR
			Lidl	Silver Street, Kings Heath	B14 7QU
			Threshers	260 Station Road, Wythall	B47 6EY
		Co-op	4 Hazelwell Street, Stirchley	B30 2YY	
<i>London</i>	New Southgate,	Tesco	Coppets Centre North Circular Road North Finchley, London	N12 0SH	
	London City	Asda	131 Chase Side, London	N14 5PW	
		M&S	Winchmore Hill Road, Southgate, London	N14 6AQ	

Region	Location	Store name	Address	Postal code
<b>SE England</b>	Surrey	Threshers	90 Alexandra Park Road, London	N10 2AE
		Cost Cutter	75, Friem Barnet Road, New Southgate, London	N11 3EH
		Asda	31 Roehampton, Vale, London	SW15 3DT
		Sainsbury	Bridge Way, Cobham, Surrey	KT11 1HW
		Waitrose	105 High Street, Esher, Surrey	KT10 9QE
		Oddbins	Unit 2 Surbiton Station, Victoria Road, Surbiton, Surrey	KT6 4PE
		Forecourt - Shell	sainsburys shop inside, not visited	
<b>SW England</b>	Plymouth	Tesco	Transit Way, Plymouth	PL5 3TW
		Asda	Leypark Drive Estover, Plymouth	PL6 8TB
		Waitrose	Limited Tamar View Industrial Estate, Saltash, Cornwall, Plymouth	PL12 6LD
		Indep Off Licence	West Park Wines & Spirits, 438 Crownhill Road, Plymouth	PL5 2QS
		Best one/Best way	Burrington Way, Burrington Way Industrial Estate, Plymouth	PL5 3LR
		Tesco	Cherry Hinton Express, Cherry Hinton, Cambridge	CB1 9BF
		Sainsbury	Brooks Road, Coldhams Lane, Cambridge	CB1 3HP
<b>Eastern England</b>	Cambridge	Morrisons	Broad Street, Cambourne, Cambridge	CB23 6EY
		Netto	Fordham Retail Pk Oakes Dv, Newmarket, Suffolk	CB8 7SX
		Majestic Wine	228 Newmarket Road, Fen Ditton, Cambridge	CB5 8JL
		Tesco	30 Meadow Place Road, Edinburgh	EH12 7UQ
		Asda	3 New Market Road, Edinburgh	EH14 1RJ
<b>Scotland</b>	Edinburgh	Morrisons	102 Pilton Drive, Edinburgh	EH5 2HF
		Threshers	77 Slateford Road, Edinburgh	EH11 1PR
		ScotMid Co-op	1 Drum Brae Ave, Edinburgh	EH12 8TE
		Morrisons	International Way, International Sports Village, Cardiff Bay	CF11 0JP
<b>Wales</b>	Cardiff	Sainsbury	Colchester Avenue, Cardiff	CF23 9XN
		Budgens	36 Cardiff Road, Dinas Powys	CF64 4JS
		Indep Off Licence	Discount Supermarket, 97-99 Whitchurch Road, Cardiff	CF14 3JP
		Forecourt - BP	Hadfield Road, Leckwith, Cardiff	CF11 8AQ
<b>NI</b>	Londonderry	Sainsbury	Strand Road, Derry, Co. Londonderry	BT48 7AB
		Tesco	Tempo Rd. Enniskillen Co. Fermanagh	BT74 6HX
		Supervalu	High Street Omagh Co Tyrone	BT78 1AB
		Threshers	Melmount Road Strabane Co. Tyrone	BT82 9JU
		Spar	Dromore Rd, Irvinestown Co. Fermanagh	BT94 1

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## Instructions for Shoppers

Please read these instructions before consulting the shopping list.

### Introduction

This Department of Health funded survey is being conducted to check whether or not a selection of alcoholic drinks, include information that is expected to be provided as part of a voluntary agreement with the alcohol industry. RQA Europe is purchasing most of the samples on behalf of the main contractor, Campden and Chorleywood Food Research Association (CCFRA).

Samples are being collected in Scotland, Wales, Northern Ireland and the nine English regions. Your role is to purchase about 42 specific drinks in one of these areas. The drinks are a mix of “branded” products, i.e. those made by manufacturers and marketed by them under their own brand name, for example *Smirnoff*, *Stella*, *Gallo*, and “own-label products”, which are produced for an individual retailer and sold under that retailer’s brand name or a name associated with that retailer, for example *Tesco Claret*. Sometimes it will not immediately be clear which is which. In these cases look for words (sometimes on the back of the label) like “Made for...” or “Selected for...”, followed by the retailer’s name and address, for example *Made for Aldi Stores* etc. In these cases the product can be regarded as a retailer own brand, even if it doesn’t otherwise feature the store’s name.

### The shopping lists

The shopping lists are in two parts

Firstly, the list of branded products. These can be purchased from **any** store you are asked to visit. This is followed by a list of unnamed minor branded products These are defined as branded products, but **not** one of the main brands specified in brackets in each case. Look for such minor brands first in an off-licence or convenience store. Only if you can not find them there, then look for them in one of the other outlets you are asked to visit. Please plan the order of your shopping trips accordingly

Secondly, the-own label products. These must be purchased from the named store. If they are not available in that store then please, if possible, purchase a substitute that is as similar as possible to the listed drink. This must be in the same packaging format as the original listed drink. This is made clear on the sample purchase lists. These lists also have tick boxes to complete once you have found a product.



## Annex 4

Where the drinks on your list are presented in a range of sizes, unless your sample list is more precise, choose the product that takes up most shelf space.

In some cases an "own label" product may be available in different variations. If you are asked to acquire more than one such product please ensure that overall you purchase a range of premium, mid-range price and economy lines. Examples of the main lines in each store are as follows.

<b>Store</b>	<b>Economy Line</b>	<b>Standard</b>	<b>Premium Line</b>
Tesco	Value	Tesco	Finest
Sainsbury	Economy / Basics	Sainsbury	Taste the Difference
Morrisons	Bettabuy	Morrisons	The Best
Asda	SmartPrice	Asda	Extra Special
Somerfield	Simply Value	Somerfield	Best Ever

Make sure you keep the till receipt as it includes a full list of the items you have purchased; makes it clear where they were bought and gives details of the prices paid for each product.

### **In case of difficulties**

There is no reason why you may not start your shopping without announcing your presence and purpose to the store management. If any difficulties arise, however, please contact:

RQA Europe:

Sara Withington

0118 935 7254



## Department of Health Alcohol Labelling Assessment Form

**Assessor code:** (empty)

### Product Identity and Characterisation

1.	Sample ID	
2.	Brand name	
3.	Description	
4.	Bar code	
5.	Drink type (major)	
6.	Drink type (minor)	
7.	Bought from store	
8.	Location of store	
9.	Number of items	
10.	Volume per item (ml)	
11.	Package type	
12.	Internal label	
13.	Branded / own label	
14.	Brand holder contact (on pack)	
15.	Imported	(empty)
16.	Country of Origin	
17.	Alcohol by volume (ABV) %	

### The Sensible Drinking Message

Is the sample labelled with the following information?

*N.B. The 'comments' box at the end of this form can be used to supply further information. For packs where there are outer and inner labels, q 18 to 62 relate to information on the outer and q 63 to 107 relate to information on inner labels.*

18.	"Know Your Limits" statement	(empty)
19.	"Enjoy Responsibly" statement	(empty)
20.	"Drink Responsibly" statement	(empty)
21.	If a different responsibility slogan is used, specify:	
22.	UK units per container	(empty)
23.	Specify number of UK units per container:	
24.	UK units per glass	(empty)
25.	Specify number of UK units per glass:	
26.	Size of glass specified:	
27.	The recommended Government sensible drinking guideline: <i>"UK health departments recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily"</i>	(empty)
28.	If a different sensible drinking message to the Government's recommended wording is used, specify:	

## Annex 5

29.	The website address of the Drinkaware Trust - www.drinkaware.co.uk	(empty)
30.	"Avoid alcohol if pregnant or trying to conceive" statement	(empty)
31.	If a different alcohol in pregnancy statement is used, specify	
32.	The 'alcohol in pregnancy' logo	(empty)

### Grouping of Information

Where present, are the sensible drinking message, alcohol in pregnancy message/logo and unit content grouped?

33.	Within a defined border	(empty)
34.	On a single face	(empty)
35.	In the same field of vision	(empty)

### Printable Area on Pack

	Area in cm <sup>2</sup>	Area of component	Calculated % of printable area
36.	Total printable area on pack		100
37.	Sensible drinking information		

### Clarity of Information

Where present, are the sensible drinking message, alcohol in pregnancy message/logo and unit content?

38.	Easily visible	(empty)
39.	Clearly legible	(empty)
40.	Indelible	(empty)
41.	Hidden	(empty)
42.	Obscured	(empty)
43.	Interrupted with other written or pictorial matter	(empty)

If the following features have been used for the sensible drinking message, alcohol in pregnancy message/logo and unit content, do they affect the clarity of the information?

			If 'Yes', give details
44.	Small font sizes (below 8 points)	(empty)	
45.	Poor choice of font	(empty)	
46.	Shadowing	(empty)	
47.	Bold text, except where legitimately used for emphasis	(empty)	
48.	All upper case letters for emphasis	(empty)	
49.	Italics for large blocks of text or small fonts	(empty)	
50.	Underlining for emphasis	(empty)	
51.	Text in other than range left format	(empty)	
52.	Hyphenation	(empty)	
53.	Coloured text/backgrounds	(empty)	
54.	Poor tonal contrast between text and background	(empty)	

## Annex 5

55.	Reversing out (except for heading in larger font sizes)	(empty)	
56.	Watermarking	(empty)	
57.	Use of red and green together	(empty)	
58.	Pastel shades	(empty)	
59.	Wrapping text around images	(empty)	
60.	Metallic/shiny surfaces	(empty)	
61.	Indistinct numerals	(empty)	

62.	<b>Comments:</b> Please use this section to expand on responses as appropriate. Prefix all comments with the 'q' (question) number to which they refer.
-----	--

**This section is for packs with separate labelling information on inner labels ONLY**

### The Sensible Drinking Message

Is the sample labelled with the following information?

*N.B. The 'comments' box at the end of this form can be used to supply further information.*

63.	"Know Your Limits" statement	(empty)
64.	"Enjoy Responsibly" statement	(empty)
65.	"Drink Responsibly" statement	(empty)
66.	If a different responsibility slogan is used, specify:	
67.	UK units per container	(empty)
68.	Specify number of UK units per container:	
69.	UK units per glass	(empty)
70.	Specify number of UK units per glass:	
71.	Size of glass specified:	
72.	The recommended Government sensible drinking guideline: <i>"UK health departments recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily"</i>	(empty)
73.	If a different sensible drinking message to the Government's recommended wording is used, specify:	
74.	The website address of the Drinkaware Trust - www.drinkaware.co.uk	(empty)
75.	"Avoid alcohol if pregnant or trying to conceive" statement	(empty)
76.	If a different alcohol in pregnancy statement is used, specify	
77.	The 'alcohol in pregnancy' logo	(empty)

### Grouping of Information

Where present, are the sensible drinking message, alcohol in pregnancy message/logo and unit content grouped?

78.	Within a defined border	(empty)
79.	On a single face	(empty)
80.	In the same field of vision	(empty)

### Printable Area on Pack

	Area in cm <sup>2</sup>	Area of component	Calculated % of printable area
81.	Total printable area on pack		100
82.	Sensible drinking information		

<b>Clarity of Information</b>
-------------------------------

Where present, are the sensible drinking message, alcohol in pregnancy message/logo and unit content?

83.	Easily visible	(empty)
84.	Clearly legible	(empty)
85.	Indelible	(empty)
86.	Hidden	(empty)
87.	Obscured	(empty)
88.	Interrupted with other written or pictorial matter	(empty)

If the following features have been used for the sensible drinking message, alcohol in pregnancy message/logo and unit content, do they affect the clarity of the information?

			<b>If 'Yes', give details</b>
89.	Small font sizes (below 8 points)	(empty)	
90.	Poor choice of font	(empty)	
91.	Shadowing	(empty)	
92.	Bold text, except where legitimately used for emphasis	(empty)	
93.	All upper case letters for emphasis	(empty)	
94.	Italics for large blocks of text or small fonts	(empty)	
95.	Underlining for emphasis	(empty)	
96.	Text in other than range left format	(empty)	
97.	Hyphenation	(empty)	
98.	Coloured text/backgrounds	(empty)	
99.	Poor tonal contrast between text and background	(empty)	
100.	Reversing out (except for heading in larger font sizes)	(empty)	
101.	Watermarking	(empty)	
102.	Use of red and green together	(empty)	
103.	Pastel shades	(empty)	
104.	Wrapping text around images	(empty)	
105.	Metallic/shiny surfaces	(empty)	
106.	Indistinct numerals	(empty)	

107.	<p><b>Comments:</b> Please use this section to expand on responses as appropriate. Prefix all comments with the 'q' (question) number to which they refer.</p>
------	--

[End of Assessment Form]

## DEPARTMENT OF HEALTH - ALCOHOL LABELLING ASSESSMENTS

CCFRA PROJECT NUMBER: 107684

### GUIDANCE NOTES FOR ASSESSORS

#### Introduction

The Government announced in May 2007 that it had reached agreement with representatives from the drinks industry for a UK wide voluntary scheme for the inclusion of sensible drinking messages on alcohol labels. The strategy notes that labels may include the following:

- Alcohol unit content (UK units) of containers and (for wine, beer and spirits where practicable) of a standard glass ;
- The recommended Government's safe drinking guidelines - *"UK Chief Medical Officers recommend men do not regularly exceed 3-4 units daily and women 2-3 units daily"*;
- A sensible drinking message such as "Know your limits";
- The website address of the Drinkaware Trust: [www.drinkaware.co.uk](http://www.drinkaware.co.uk)
- Information on alcohol and pregnancy - *"Avoid alcohol if pregnant or trying to conceive"*.

Further information on the Government's guidelines can be accessed at:  
<http://drugs.homeoffice.gov.uk/publication-search/drug-strategy/alcohol?view=Binary>

The DoH has commissioned this survey:

- to test whether the Government's alcohol labelling agreement with industry is being followed for alcoholic drinks in the marketplace
- to inform the DoH's approach to the future control of unit and health information on alcoholic drinks.

## THE ASSESSMENT FORM

### Tips For Navigating in a Form

When a form is locked, you can only fill in those areas which are form fields (normally shaded grey). You can use the mouse to select fields, or else use the tab or arrow keys.

#### Form fields:

There are two types of form fields:-

**(1) Drop down boxes.** When you select this field, a drop down arrow appears.

Mouse: If you click into it, the selection list appears. Left-click to select the appropriate choice (usually, 'yes', 'no' and 'n/a (not applicable)').

Keyboard: ALT+down arrow to make the selection list appear. Navigate the list using arrow keys. Press Enter to accept. Alternatively, once you have the selection list, you can press the starting letter of the choice (e.g. 'y' for 'yes'). If two choices start with the same letter, press the 'y' again for the second option starting with 'y', for example.

**(2) Text boxes.** Type normally into the text boxes. If you press Enter, it will obtain a new line in the field. Certain product identity information has been entered into the form automatically and should not be changed unless it is wrong (in which case, this should be noted under 'comments'). NB: spell checking does not work in forms, so check your typing!

#### Navigating in a Form:

You can make use of the GoTo command to navigate a form. In Office 2007, click the "Page:" button on the Status bar at the bottom of the screen. The keyboard shortcut F5 works in all versions of Word (and Excel). Choose a page number to jump to, or else select 'Bookmark' and choose a question reference in the 'bookmark name' dropdown list.

CTRL + HOME takes you to the start of the form, CTRL + END takes you to the end.

#### CCFRA Contacts:

Selina Clayton (Tel: 01386 842206 or email [s.clayton@campden.co.uk](mailto:s.clayton@campden.co.uk)) for assistance with interpretative matters.

Dr Heather Lawler (Tel: 01386 842057 or email [h.lawler@campden.co.uk](mailto:h.lawler@campden.co.uk)) for IT related enquiries.

## Completing the Assessment Form

### Assessor Codes

Assessor codes are shown below. This is the first field of the form which must be filled in.

1 = Sheila Barbour	7 = Sarah Ealey	13 = Karen Tudor	19 =
2 = Paul Bellew	8 = Kirsty Edmonds	14 = Ann Wood	20 =
3 = Annalie Brown	9 = Chris Ivin	15 = Sue Keenan	
4 = Yvonne Butler	10 = Ruth Price	16 = Leonie Watson	
5 = James Carter	11 = Anthea Smith	17 =	
6 = Brian Dean	12 = Elizabeth Stewart	18 =	










Once you have selected a sample for assessment, please ensure that the sample details present tally with the information pre-loaded into the corresponding assessment form. Then check the photographic image(s) of your sample (you will find these, categorised by the letters which prefix your sample number, and housed in a file named 'Images' in the electronic 'Labelling Assessments' folder )to ensure that these too match the product which you have selected. Inform the supervising Food Law Adviser if any discrepancies are found. Any information relating to safe/sensible drinking, the number of units, alcoholic strength, the drink aware website, alcohol in pregnancy etc must have been captured by the images and be clearly legible (N.B. the tool bar will allow you to zoom in on the images). If any of this information has not been captured or is unclear, please make a note of the filename of the image and the issue you have discovered and pass to the supervising Food Law Adviser.

Please do not leave any blank or empty fields in the form. It might be appropriate to use a 'n/a' or 'no' response for example - but if in doubt, consult the supervising Food Law Adviser.

ASSESSMENT CRITERIA	GUIDANCE / INTERPRETATION	EXAMPLES
<b>Product Identity and Characterisation</b>		
<p>In general</p> <p>Row 5 - Drink type (major)</p> <p>Row 6 - Drink type (minor)</p> <p>Row 11 – Package type</p> <p>Row 12 - Internal label</p> <p>Row 13 – Branded/own label</p> <p>Row 14 - Brand holder contact (on pack)</p> <p>Row 15 - Imported</p>	<p>Assessors must double check the pre-loaded information in rows 1 to 17. If discrepancies are discovered, please overwrite it with the correct description. If there are major discrepancies between the pre-loaded data and your sample, please consult the supervising Food Law Adviser immediately.</p> <p>For information, there are 4 major categories: beers, wines, spirits, flavoured alcoholic beverages.</p> <p>For information, the minor categories are: lager, beer, stout, cider &amp; perry, light wines (red, white, rose), sparkling wine, fortified wines (sherry, port, vermouth, other), white spirits (vodka, gin, rum, other), dark spirits (whisky, scotch whisky, malt whisky, rum, brandy, other), liqueurs and flavoured alcoholic beverages.</p> <p>For information, the 8 types of packaging format are: can, bottle – glass, bottle – other, multipack (&lt;=6) can, multipack (&gt;6) can, multipack (&lt;=6) bottle, multipack (&gt;6) bottle) and wine box.</p> <p>The response to this will either be 'Yes' or 'No' to indicate whether or not the product is packaged in such a way to have a label on internal packaging as well as external packaging surrounding it.</p> <p>'Own label' is taken to mean products where the retailer (e.g. Tesco, Thresher, Spar) strongly influences the design and content of the label as evidenced by the retailers name being present on the label (whether predominantly or not).</p> <p>'Branded' means brands other than own label which account for a substantial market share of the particular drink (e.g. Stella, Carlsberg etc).</p> <p>Full address details (as they appear on the product label) should be entered into this row.</p> <p>Assessors will need to completed this field with either the answer 'yes', 'no' or 'insufficient info to determine'. Products which seem to have been imported as a bulk liquid and then bottled/packed in the UK are being classed as <u>not</u> imported. Consult the Food Law Adviser if you need assistance in determining whether or not the product is imported.</p>	





		<div data-bbox="1297 191 1776 487"> <p><b>Drink Responsibly</b></p> <p>UK Health departments recommend adults do not regularly exceed:</p> <table border="1"> <tr> <td>Men</td> <td>3-4 units a day</td> <td rowspan="2"></td> </tr> <tr> <td>Women</td> <td>2-3 units a day</td> </tr> </table> <p><b>9.8 UK Units</b></p> <p><a href="http://DRINKAWARE.CO.UK">DRINKAWARE.CO.UK</a></p> </div> <div data-bbox="1289 545 1776 980"> <p><b>Drink Responsibly</b></p> <p>UK Government recommends adults do not regularly exceed:</p> <table border="1"> <tr> <td>Men</td> <td>3-4 units a day</td> <td rowspan="2"></td> </tr> <tr> <td>Women</td> <td>2-3 units a day</td> </tr> </table> <p><b>9.8 UK Units</b></p> <p><a href="http://DRINKAWARE.CO.UK">DRINKAWARE.CO.UK</a></p> </div> <div data-bbox="1297 1065 1864 1351"> <p><b>Drink Responsibly</b></p> <p>UK Government recommends adults do not regularly exceed:</p> <table border="1"> <tr> <td>Men</td> <td>3-4 units a day</td> <td rowspan="2"></td> </tr> <tr> <td>Women</td> <td>2-3 units a day</td> </tr> </table> <p><b>9.8 UK Units</b></p> <p><a href="http://DRINKAWARE.CO.UK">DRINKAWARE.CO.UK</a></p> </div>	Men	3-4 units a day		Women	2-3 units a day	Men	3-4 units a day		Women	2-3 units a day	Men	3-4 units a day		Women	2-3 units a day
Men	3-4 units a day																
Women	2-3 units a day																
Men	3-4 units a day																
Women	2-3 units a day																
Men	3-4 units a day																
Women	2-3 units a day																

<b>Printable Area on Pack</b>		
Q36 and 37.	<p>Printable area: Establish this using the following principles</p> <ul style="list-style-type: none"> <li>• Printable area will normally be self-defining: i.e. the area that is printed.</li> <li>• Clear packaging, through which the product can be viewed, is not printable.</li> <li>• For direct printing on clear packaging calculate the total area from the horizontal (x) and vertical (y) distances between the first and last printed image or character.</li> <li>• Each of the labels attached to clear packaging is regarded as printable on the consumer facing side. Calculate the sum of the areas of each separate label using the area calculator sum these. Labels with information printed on the reverse side should be regarded as having twice the normal printable area.</li> <li>• Bottoms and tops of cans are generally not printable.</li> <li>• Ignore, as trivially small, the area taken up by printed dates and/or lot marks on otherwise unprinted areas of a package.</li> <li>• Opaque directly printed plastic packaging should be regarded as printable.</li> <li>• Consider the normal form in which a pack is presented to the consumer. On this basis the bottom face of tall packs will rarely, if ever, be regarded as printable.</li> <li>• Reduce or approximate complicated geometrical shapes to a simpler shape or series of shapes. Use the area calculator to determine the area of each component: these figures can then be summed.</li> </ul> <p>All measurements will be determined using the flexible scale rules provided (capable of measuring packs of up to 20cm to an accuracy of 1mm).</p> <p>Having taken the necessary measurements from the packaging, assessors must use the separate Excel spreadsheet that has been developed to aid with the calculation of printable areas. This spreadsheet can be found in: L:\2008\Contracts\Infoleg 2008\DoH Alcohol\Labelling Assessments\Calculate printable area. A separate Excel spreadsheet exists for each Assessor.</p>	
<b>Clarity of Information on Pack</b>		
Q38.	<p>“Easily visible” should be taken to mean easily found/located. N.B. if none of the three pieces of information specified is present, the appropriate response is ‘N/a’.</p>	
Q39.	<p>“Clearly Legible” should be taken to mean that the information can be clearly read (i.e. the text should not be smudged, fuzzy, or in a font size/style that makes it difficult to read).</p>	
Q40.	<p>“Indelible” should be taken to mean that the information cannot be rubbed/blotted out and should not have worn away.</p>	

## Annex 6

Q42.	"Obscured" can also include circumstances where information has been ink jetted entirely or partly over existing essential information.	
Q44 to 61 – In General.	<p>Assessors are asked if, in their judgement, the clarity of the label is adversely affected by the style of labelling / packaging used.</p> <p>This is reporting against the FSA requirements on print size and clarity from their Clear Labelling Guidelines: These guidelines will be available in the assessment room or can be accessed at:  <a href="http://www.food.gov.uk/multimedia/pdfs/clearlabelling.pdf">http://www.food.gov.uk/multimedia/pdfs/clearlabelling.pdf</a></p> <p>Possible responses are:</p> <p><b>Yes</b> – the feature is used and it does affect clarity of the information.</p> <p><b>No</b> – the feature is used but it does not affect clarity.</p> <p><b>Not applicable</b> – the feature is not used.</p>	
Q44 – Small Font Sizes.	<p>The 'Point Perfect' measuring device must be used to aid the assessment of text size. Directions: Using a portion of text which includes a capital letter and a descender (g, j, p, q, or y), align the black hairline so that it just touches the top of the capital and read off the point size indicated by the line touched by the bottom of the descender.</p> <p>Please note that the device cannot be used for text which appears ALL in capital letters. If capitals letters have been used for either the sensible drinking message, alcohol in pregnancy message or the drinks unit content, please note this fact in the Comments field at the end of the section.</p> <p>N.B. The FSA advise that font sizes below 8 points can affect clarity.</p>	E.g. You might state 'The "Avoid alcohol if pregnant or trying to conceive' statement appears all in capital letters - not possible to measure font size.
Q45 - Poor Choice of Font.	This would include the use of decorative/ornate fonts.	
Q46.	<b>Shadowing looks like this.</b>	
Q48 – All Upper Case Letters.	In circumstances where uppercase letters are used for emphasis, the Assessor will need to use his/her judgement to determine if the clarity of the label is adversely affected.	
Q53 – Coloured Text/backgrounds.	The presence of anything other than black text on a white background will trigger a "Yes" (if clarity is affected by this feature) or "No" (if clarity is not affected by this feature).	

## Annex 6

Q54 – Tonal contrast between text and background.	Good tonal contrast will be ensured if the type is dark and the background is light. Poor tonal contracts occurs either when the text and background are light or when the text and background are dark.	
Q55 -Reversing out	This is where light text is used on a dark background.	
Q57 – Use of red and green together.	The word “together” is crucial here – the mere presence of red and green colours on a label would trigger a “Not Applicable” response if they are not used TOGETHER.	
Q59 – Wrapping Text.	‘Wrapping text around images’ should be taken to mean that a picture/image/logo has been positioned in such a way that it <i>interrupts continuous text</i> - the words that make up the text therefore appear on either side of the picture.	
Q60 – Shiny Surfaces.	<p>The IGD Guidelines ‘Packaging Legibility Recommendations for Improvement’ warn that high gloss finishes can increase glare and that alternative finishes should be considered.</p> <p>For example, many types of cardboard packaging materials have a smooth, glossy finish but only those with a high shine will be deemed to be ‘shiny’ for the purposes of this survey.</p>	

***If you need further advice or encounter any problems whilst conducting assessments, please seek advice from the supervising Food Law Adviser immediately.***

Please notify [s.clayton@campden.co.uk](mailto:s.clayton@campden.co.uk) if further guidance is necessary to assist with completion of the assessments. Revised guidance notes, stating date and revision number, will be sent to all Assessors as appropriate.

### **Storage of Assessment Forms**

Please see 'DoH Assessment Form Processing - Alcohol Survey' document.

## Calculating printable area - all measurements in cm

### Box

Length	
Width	
Height	
Area =	0.00

### Cylinder (not including ends)

Height	
Circumference	
Area =	0.00

### Rectangle (flat)

Length	
Width	
Area =	0.00

### Circle (flat)

Diameter	
Area =	0.00

### Rectangle (flat)

Length	
Width	
Area =	0.00

### Rectangle (flat)

Length	
Width	
Area =	0.00

Sum of all areas =

**0.00**

Clear Data

## ANNEX 8

## Reweight factors for market and sample distribution

## Market and sample distribution by drink type

	Drink type	Market share (%)	Sample count	Sample share (%)	Reweight factor
Beers	B - Beer	4.032	24	5.240	0.766
	B - Cider and Perry	3.000	17	3.712	0.805
	B - Lager	22.904	73	15.939	1.431
	B - Stout	1.064	5	1.092	0.971
Flavoured alcoholic beverage	3.000	17	3.712	0.805	
Spirits	S - Dark - Brandy	2.000	9	1.965	1.014
	S - Dark - Rum	1.000	3	0.655	1.521
	S - Dark - Whisky	9.000	40	8.734	1.027
	S - Liqueurs	3.000	11	2.402	1.244
	S - White - Gin	2.000	9	1.965	1.014
	S - White - Rum	1.000	6	1.310	0.760
	S - White - Vodka	5.000	23	5.022	0.992
Wines	W - Fortified - Other	0.924	4	0.873	1.054
	W - Fortified - Port	0.660	2	0.437	1.506
	W - Fortified - Sherry	1.012	4	0.873	1.154
	W - Fortified - Vermouth	0.528	2	0.437	1.204
	W - Light - Red	16.544	82	17.904	0.921
	W - Light - Rose	1.716	12	2.620	0.652
	W - Light - White	17.468	95	20.742	0.839
	W - Sparkling	4.532	20	4.367	1.034
	Overall	100.384	458	100.000	1.000

**Market and sample distribution by label type**

	Drink Type	Market share (%)			
		Own label	Branded	Major	Minor
Beers	B - Beer	8.00	92.00	34.00	58.00
	B - Cider & Perry	8.30	91.70	57.00	34.70
	B - Lager	4.70	95.30	57.00	38.30
	B - Stout	0.00	100.00	100.00	0.00
Flavoured alcoholic beverage		13.30	86.70	73.30	13.40
Spirits	S - Dark - Brandy	31.30	68.70	56.50	12.20
	S - Dark - Rum	32.40	67.60	63.00	4.60
	S - Dark - Whisky	34.20	65.80	46.00	19.80
	S - Liqueurs	15.10	84.90	76.90	8.00
	S - White - Gin	43.40	56.60	51.00	5.60
	S - White - Rum	27.00	73.00	73.00	0.00
	S - White - Vodka	37.70	62.30	48.00	14.30
Wines	W - Fortified - Other	30.00	70.00	70.00	0.00
	W - Fortified - Port	27.70	72.30	37.00	35.30
	W - Fortified - Sherry	37.00	63.00	55.00	8.00
	W - Fortified - Vermouth	26.50	73.50	55.00	18.50
	W - Light - Red	32.20	67.80	34.00	33.80
	W - Light - Rose	32.20	67.80	34.00	33.80
	W - Light - White	32.20	67.80	34.00	33.80
	W - Sparkling	32.60	67.40	52.17	15.23
<b>Over all drink types</b>		23.42	76.58	47.82	28.76
<b>Sample count</b>		85.00	373.00		
<b>Sample share (%)</b>		18.56	81.44		
<b>Reweight factor</b>		1.26	0.94		

## ANNEX 9

### Alternative responsibility statements

List of Alternative responsibility messages that do not comply with the labelling agreement

<b>Alternative Responsibility messages</b>	<b>Total</b>
Please drink responsibly / Please drink responsibly at all times	26
Always enjoy Hardys wines in moderation	6
Do not drink and drive play sport or operate machinery. It is illegal to sell alcohol to under 18 year olds.	4
Always enjoy Kumala wine in moderation	3
ASDA promotes responsible drinking. Please drink responsibly at all times.	3
Don't drink and drive	3
Drink Jacob's Creek Responsibly	3
Drink Sensibly	3
Enjoy Carling...take it easy	3
INBEV UK is a member of the Portman Group - Promoting sensible drinking (all in capitals)	3
Use the daily guidelines for sensible drinking. Refraining on one day should not mean excess on another Do not drink and drive, play sport or operate machinery. It is illegal to sell alcohol to under 18 year-olds.	3
Best Enjoyed Responsibly	2
Drink Montana responsibly	2
Enjoy Banrock Station wines in moderation	2
Member of the Portman Group promoting sensible drinking	2
Please enjoy Campo Viejo responsibly	2
Please enjoy responsibly	2
Please visit: <a href="http://enjoyheinekenresponsibly.com">enjoyheinekenresponsibly.com</a>	2
Promoting sensible drinking	2
Always enjoy Ravenswood Wines in Moderation	1
Enjoy AMSTEL Responsibly	1
Enjoy Grants Responsibly	1

Enjoy Jameson Responsibly	1
Enjoy LAMB'S NAVY RUM Responsibly	1
Enjoy our tradition responsibly	1
Enjoy responsibly	1
Enjoy STEWARTS CREAM OF BARLEY responsibly	1
Enjoy Three Barrels responsibly	1
Enjoy TIA MARIA responsibly	1
Enjoy Wine in moderation	1
Enjoy WKD responsibly	1
Joseph Jones supports responsible drinking.	1
Not to be sold to under 18	1
Please drink White Star responsibly	1
Please drink Olde English responsibly	1
Please enjoy Belhaven beers responsibly	1
Please enjoy McArthur's responsibly	1
Please enjoy our whisky responsibly	1
Please enjoy this beer responsibly	1
Please enjoy your whisky responsibly	1
Please savour responsibly	1
Please take as much care enjoying our beers as we do brewing them. Drink sensibly	1
Remember, you can have too much of a good thing	1
Respect alcohol. Respect yourself.	1
Robert Cain support responsible drinking. Excessive drinking can cause harm.	
Observe the daily guidelines for sensible drinking. Do not drink and drive.	1
Skilfully crafted. Enjoy responsibly	1

## ANNEX 10

### Alternative health and unit information guidelines

Alternative sensible drinking guidelines that do not comply with the labelling agreement

	Total
Guideline Daily amounts for (average) adults: Women 2-3 units daily, 14 units weekly; Men 3-4 units daily, 21 units weekly. Official government figures. (Tabular)	19
Responsible drinkers don't exceed 4 daily units men 3 daily units women	12
Government guidelines Do not regularly exceed Women 2-3 units daily, Men 3-4 units daily (Tabular)	4
Use the daily guidelines for sensible drinking. Refraining on one day should not mean excess on another Units per day Men 3-4, Women 2-3 (Tabular)	4
UK Government sensible drinking limits Men 3 to 4 units, Women 2 to 3 units per day (Tabular)	3
UK Health Departments official figures recommend figures recommend adults do not regularly exceed Women 2-3 units daily 14 units weekly, Men 3-4 units daily 21 units weekly. (Tabular)	3
UK Health Departments sensible drinking guidelines Women 2-3 units daily, Men 3-4 units daily (Tabular)	2
UK alcohol units Responsible drinkers don't exceed 4 daily units men 3 daily units women	2
Observe the daily guidelines for sensible drinking	1
UK guidelines recommend that men should not regularly drink more than 3 to 4 units and women 2 to 3 units a day	1
UK Health department recommends adults do not regularly exceed Men 3-4 units daily, 21 units weekly, Women 2-3 units daily 14 units weekly (Tabular)	1
Observe daily guidelines	1
Maximum recommended units per day. Units of alcohol Men 4 Women 3 (Tabular)	1

## ANNEX 11

### Alternative alcohol in pregnancy statements

Alternative alcohol in pregnancy statements that do not comply with the Chief Medical Officers' advice

Alcohol in pregnancy statement	Total
Before/during pregnancy. Most studies show that 1-2 units of alcohol once or twice a week do not cause harm in pregnancy.	4
Seek medical advice regarding alcohol and pregnancy	4
Statement in French "La consommation de boissons alcoolisées pendant la grossesse, même en faible quantité, peut avoir des conséquences graves sur la santé de l'enfant."	1
Women should not drink alcoholic beverages during pregnancy and breast-feeding	1

## ANNEX 12

### Clarity issues

#### Summary of clarity and general comments

Given below is a summary of the general comments made by assessors concerning the clarity, placement and general issues concerning the unit and health information where present.

Text positioned at the bottom of the label amongst other information (such as information about the producer, returns information)

Very small font

Pregnancy logo amongst other logos unrelated to sensible drinking

Pregnancy logo not included within the defined border

Enjoy in a larger font size than responsibly

Text vertical

Unit information separated by text from the responsible drinking and drinkaware information

Drinkaware website represented as a sideways glass plus letters therefore not full font text

Unit information represented as a bottle with a number inside but no text

No sensible drinking information but does contain the statement “The use of sharp instruments to open this box is not recommended

Information located in different places

Pregnancy logo smaller size than recycling and handyman logos

Text in foreign language

“Try me, Love me” in bolder and larger font size than drink responsibly statement adjacent

Indication given that the product is Strong

UK unit information in text that is too small to read easily

Responsible drinking information not easy to find amongst other text

Relevant information all on the bottom of the pack

18 in a triangle but no associated wording

Reference given to looking over 21 and asking for ID

Information given on a detachable tag

Text fuzzy

Use of unsuitable text / background

- Clear bottle with white text
- Silver background, blue text
- Red background, green text
- Green background, white text

## ANNEX 13

## Evidence and strengths of association

## Table of Evidence and Strength of Association

P values of 0.05 or less are highlighted. The columns (Branded/Own-Label, Brandholder Country, Major Product Type, Packaging Format and Country of Origin) are p-values from a Chi-square or Fisher's Exact Probability Test, with the corresponding Goodman-Kruskal tau statistic for strength of association in parentheses

Is the sample labelled with the following information?	Branded/own-label	Brandholder country	Major product type	Packaging format	Country of origin*
"Know your limits"	0.007 (0.02)	0.048 (0.01)	<0.001 (0.03)	0.123	<0.001 (0.05)
"Enjoy responsibly"	0.008 (0.02)	0.032 (0.01)	<0.001 (0.05)	<0.001 (0.08)	0.913
"Drink responsibly"	0.064	0.005 (0.02)	0.095	0.584	0.018 (0.01)
UK units per container	0.335	<0.001 (0.06)	<0.001 (0.13)	<0.001 (0.13)	<0.001 (0.12)
UK units per glass	<0.001 (0.40)	<0.001 (0.03)	0.015 (0.02)	0.21	0.620
Agreed sensible drinking guideline "UK Chief Medical Officers Departments recommend men do not regularly exceed 3-4 units daily and women, 2-3 units daily	0.133	0.07	0.001 (0.03)	0.10	<0.001 (0.05)
The website address of the Drinkaware Trust ( <a href="http://www.drinkaware.co.uk">www.drinkaware.co.uk</a> )	0.606	<0.001 (0.06)	<0.001 (0.10)	<0.001 (0.09)	<0.001 (0.06)
"Avoid alcohol if pregnant or trying to conceive"	<0.001 (0.09)	0.124	0.166	0.398	0.507
The 'alcohol in pregnancy' logo	0.001 (0.02)	0.008 (0.02)	<0.001 (0.06)	0.370	<0.001 (0.03)

\* UK/Non-UK, where Non-UK includes EU and EC

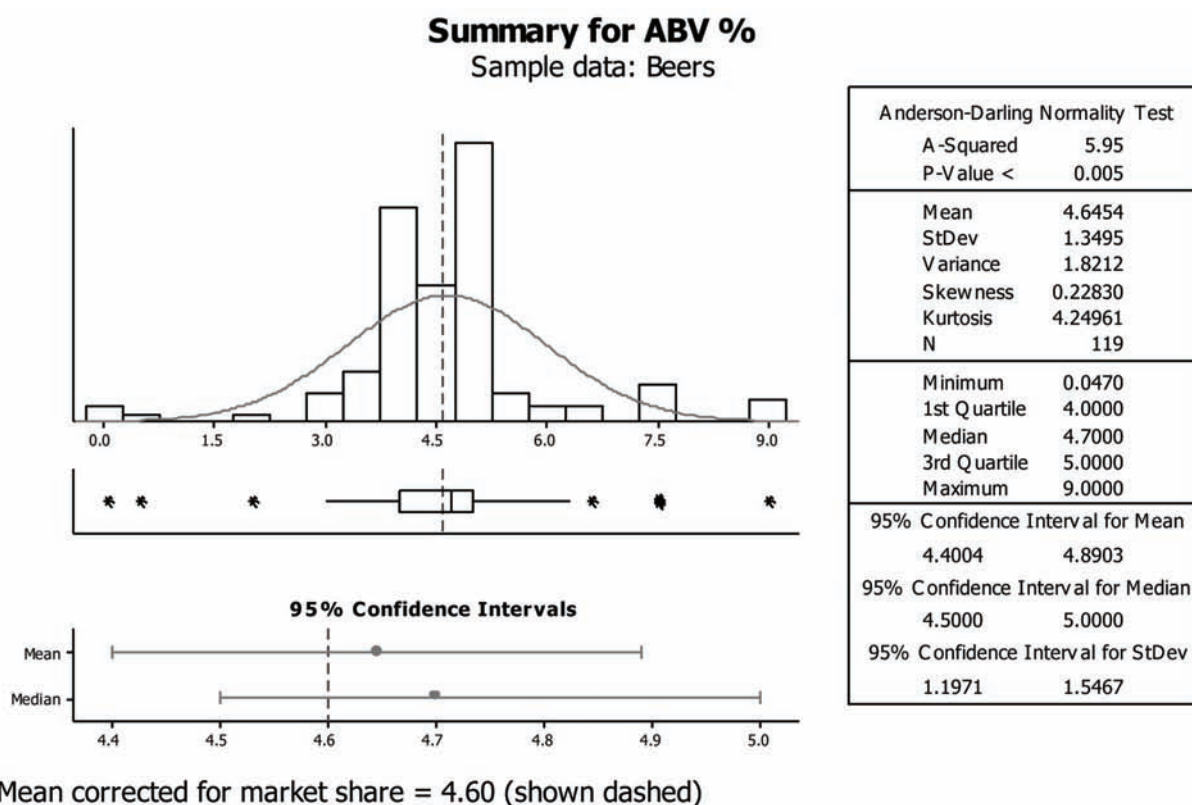
## ANNEX 14

### ABV distribution and unit calculation

#### Mean ABV for Wines and Beers

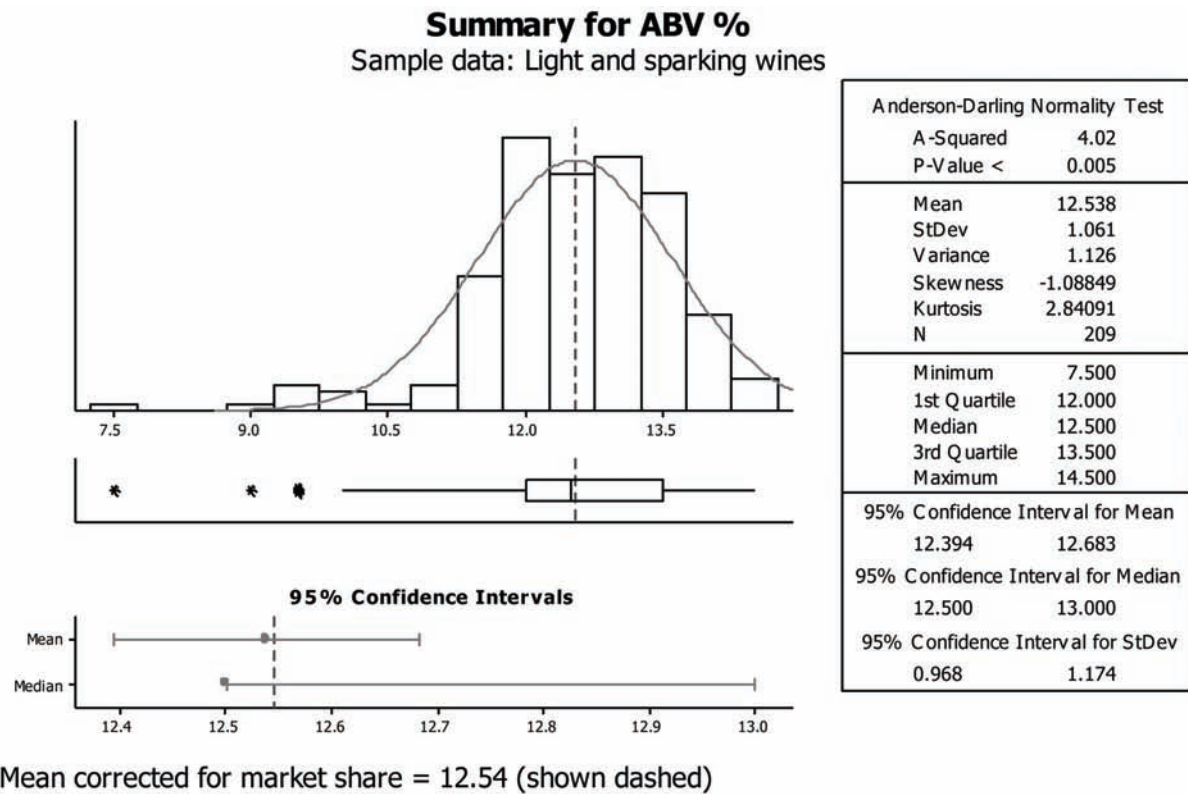
In sampling it was possible that there may be the possibility of distinct groups with substantially different ABV (e.g. ‘premium’ beers and ‘ordinary’ beers) which it does not make sense to group into one average. Therefore the average ABV has been assessed for wines and beers also taking into account appropriate market share weighting.

From the graph below it can be seen that, for beers, the mean of the sample data reasonably summarises the data. The market corrected mean is quite close to the raw mean, well within the Confidence Interval on the raw mean.



Information for wines was analysed in terms of the light and sparkling wines.

From the graph below it can again be seen that for light and sparkling wines the sample data reasonably summarises the data. The market corrected mean is quite close to the raw mean, well within the Confidence Interval on the raw mean.



### Unit calculations

In addition an exercise was conducted to determine the accuracy of the units of alcohol stated in relation to the given ABV information.

Per container:-

Unit calculations per container were calculated as

$$\text{UK units} = \text{ABV (\%)} * \text{Container volume (ml)} / 1000$$

Where the units per container was declared (in 199 samples out of 458) agreement to within 0.1 units was found in all except 9 instances. The range of variance was -1.8 – 2.0 units

Per glass/serving

Unit calculations per glass/serving were calculated as

$$\text{UK units} = \text{ABV (\%)} * \text{Serving volume (ml)} / 1000$$

Where the units per glass or serving was declared (in 85 samples out of 458) agreement to within 0.1 units was found in all instances.