

CONSULTATION - *Low Alcohol Descriptors*

CONSULTATION SUMMARY PAGE

Date consultation launched:	Closing date for responses:	
18 April 2018	11 July 2018	
Who will this consultation be of most interest to?		
Alcohol Industry, Healthcare Professionals, Health Education Bodies, Enforcement Officers, Charities, Consumer Groups. This consultation applies to Northern Ireland only. Similar consultations will be carried out in England, Scotland and Wales.		
What is the subject of this consultation?		
The Food Labelling Regulations (Northern Ireland) 1996 set out in law, rules for how low alcohol drinks (those of 1.2% alcohol by volume, ABV, or less) may be described. The Regulations are due to expire on 13 December 2018.		
Consultations are now being carried out across the UK on how best to continue to communicate information to the public about low alcohol products, so that adults can make informed choices when they purchase drinks, including alcohol. The sale of lower strength drinks, as an option for consumers helps encourage responsible drinking.		
We want to use this consultation to hear your views on whether new descriptors for alcoholic drinks above 1.2% ABV and the promotion of lower strength drinks should be introduced.		
The Department of Health and Social Care in England has led on research in this area to date.		
We believe any future low alcohol descriptors could be introduced through guidance rather than further legislation.		
What is the purpose of this consultation?		
This consultation provides interested parties with an opportunity to provide feedback on the proposals to use guidance rather than legislation, views on the current low alcohol descriptors and on whether to extend the range of descriptors to drinks above 1.2% ABV.		
A copy of the consultation documents will also be available on our website in due course - https://www.food.gov.uk/news-updates/consultations/		
Responses to this consultation should be sent to:		
Executive Support Unit FOOD STANDARDS AGENCY Tel: 02890 417763	Postal address: 10a-10c Clarendon Road, Belfast BT1 3BG Email: executive.support@food.gov.uk	
Is an Impact Assessment included with this consultation?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> See Section 5 for reason.

If you would prefer **not** to receive future FSA consultations on this or any other subject please notify the named person in this consultation.



A Consultation on the use of Low Alcohol Descriptors

DETAIL OF CONSULTATION

1. Introduction

Current policy on low alcohol descriptors

- 1.1. The Food Labelling Regulations (Northern Ireland) 1996 (FLR 1996) set out in law, rules for how low alcohol drinks (those of 1.2% alcohol by volume, ABV, or less) may be described. These rules on the use of low alcohol descriptors aim to protect the public and inform consumers. They are due to expire on 13 December 2018.
- 1.2. The FSA in Northern Ireland, and our counterparts across the UK are consulting on how best to continue to communicate information to the public about low alcohol products, so that adults can make informed choices when they purchase drinks, including alcohol. The sale of lower strength drinks, as an option for consumers helps encourage responsible drinking.

Low alcohol descriptors contained in the Food Labelling Regulations (Northern Ireland) 1996 (FLR 1996)

- 1.1. The Food Labelling Regulations (Northern Ireland) 1996 (FLR 1996) were introduced to protect and inform consumers and provide clarity to the alcohol industry on the labelling of low alcohol drinks. In Part 1 of Schedule 8 of those regulations it contained conditions for the use of terms describing products with reduced, or no alcohol and ensure that product labels are consistent and not misleading in relation to their low alcohol content. Use of the terms is not compulsory, but, if they are used, the products must meet the conditions set out in the regulations. The relevant provisions of the FLR 1996 will be revoked on 13 December 2018 by the Food Information Regulations (Northern Ireland) 2014 (FIR).

Guidance rather than further legislation

- 1.2. Rather than continue with regulation to deliver this policy aim beyond December 2018, we agree with colleagues in the Department of Health and Social Care in England (DHSC) that such measures could be achieved through producing guidance rather by legislating. This could result in a more flexible and less burdensome approach.

Popularity of low alcohol consumption

- 1.3. The popularity and sales of low and non-alcoholic drinks in the UK is on the rise with a 20.5% increase in sales over the past 12 months¹. The market and product range is diversifying: beers, lagers, stouts, wines and even some mixed spirits are available, with some retailers dedicating shop aisles in supermarkets to stock such products. Organisations such as Club Soda (a mindful drinking forum) are helping educate the public and retailers to promote non-alcoholic alternatives.

¹ The **Grocer** online: Moderation on trend as sales of low and no-alcohol beer soars. 24 August 2017. <https://www.thegrocer.co.uk/stores/consumer-trends/moderation-on-trend-as-sales-of-low-and-no-alcohol-beer-soars/556762.article>

- 1.4. Low alcoholic products may have fewer calories than regular strength alcohol drinks and could help reduce calorie intake as part of a healthy diet. The switch to lower and non-alcoholic beverages may have a positive effect in helping achieve public health gains in reducing UK alcohol consumption and help support people to move towards drinking less than 14 units a week, as outlined in the UK Chief Medicals Officers' Low Risk Drinking guidelines published in 2016.

The Advertising Standards Authority

- 1.5. The Advertising Standards Authority (ASA) plays an important role in providing guidance on low alcohol descriptors to protect the public. The ASA is the established means for regulating advertising in all media (including marketers' own websites and social media); the ASA enforces rules authored by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).
- 1.6. The CAP (non-broadcast) and BCAP (broadcast) [Codes](#) include detailed rules relating to the advertising of alcoholic drinks, and they define alcoholic (over 0.5%) and low-alcohol (0.5 – 1.2%) drinks according to existing labelling regulations.
- 1.7. The rules prevent irresponsible marketing of alcoholic drinks, for example by preventing depictions of immoderate consumption, and use labelling regulations to define which products will be captured by those rules.
- 1.8. The rules include some exceptions for low-alcohol drinks. For example, the rule relating to factual statements and comparisons of alcoholic strength prevents advertisements from implying an alcoholic beverage is to be preferred because of its alcoholic strength – unless it is a low-alcohol drink.
- 1.9. The Codes also include a rule which encompasses the Nutrition and Health Claim Regulations 2006 (NHCR)² and prevents advertisements from making nutrition claims for alcoholic drinks, other than those allowed under NHCR, which are "low-alcohol", "reduced alcohol" and "reduced energy".

Soft drinks industry levy

- 1.10. The UK Parliament has recently introduced a UK-wide levy on soft drinks to help contribute to its plans to reduce childhood obesity by removing added sugar from soft drinks. This is a new levy that applies to the production and importation of soft drinks containing added sugar.
- 1.11. Drinks with an ABV of up to 1.2% are included in the levy. However provisions will be made to exempt certain drinks that fall within this category from the levy if it is an alcohol replacement drink, for example dealcoholised beer or wine. When these provisions are published they may also help with policy developments on low alcohol descriptors.
- 1.12. HM Revenue and Customs use the 1.2% ABV as the point below which drinks are exempt from certain alcohol duty.

UK-wide Position

- 1.13. The use of low alcohol descriptors is a devolved matter. Each UK country has introduced a similar clause in its Food Information Regulations so each will need to consider what to do when that takes effect. We are working with the Department of Health and Social Care (DHSC) in England, which has taken the lead on this, the Department of Health in Northern Ireland, Food Standards Scotland and Welsh

² Regulation (EC) 1924/2006

Government to share the information from this consultation and consider if a UK-wide agreement can be reached.

New descriptors above 1.2% ABV

- 1.14. The FIR allowed for a period for engagement with stakeholders. The DHSC undertook discussions on policy proposals on the possibility of introducing new descriptors, in particular for products with more than 1.2% ABV, with the aim of encouraging the public to move towards drinks with a lower strength than the industry standard. The focus was on proposals for beers, lagers, ciders and wines. Descriptors such as “reduced” or “lower alcohol” were proposed, but there was no consensus over the % ABV level at which these descriptors should apply.
- 1.15. In addition to these events, the DHSC commissioned independent research on public understanding of, and response to, the existing descriptors and potential new ones. While the research conducted to date did not provide definitive support for new descriptors, we are committed to the principle of increasing consumer choice, encouraging lower alcohol consumption and ensuring simplicity of information provided. Therefore, we wish to hear further views about how an additional descriptor above 1.2% ABV could deliver this.
- 1.16. This consultation provides an opportunity for you to put forward further evidence which might support the introduction of descriptors for products above 1.2% ABV.

2. Introducing Guidance to Describe Low Alcohol Descriptors

- 2.1. Beyond December 2018, we would like to continue with a set of low alcohol descriptors for 1.2% ABV and below, through guidance rather than legislation. This section provides the rationale for this approach.
- 2.2. Policy to reduce burdens on industry means that non-legislative approaches are preferable to legislation, which should be used once it has been demonstrated that satisfactory outcomes cannot be achieved by non-legislative approaches.
- 2.3. In line with this approach, our preferred method is to work with industry and other stakeholders to produce guidance and publish descriptors that should be used to describe low alcohol products. We believe this could be as effective as the current regulations and would provide more flexibility to respond to possible future policy changes.
- 2.4. Being mindful that the low alcohol descriptors have been defined in secondary legislation since 1996, there may be concerns from the public that in the absence of legislation for descriptors the alcohol industry may create their own descriptors and apply these to a level beyond 1.2% ABV. This is a legitimate concern. However, the absence of legislation does not mean an absence of regulation. The regulatory gap is to be filled by producing guidance which we would expect the alcohol industry to adhere to and follow. To further mitigate this risk, relevant enforcement authorities would still be expected to refer to the guidance when assessing whether any descriptor was misleading. Courts where applicable, would also be expected to have regard to the guidance in proceedings before them.
- 2.5. There will continue to be a legal framework around labelling of low and non-alcoholic products. It will continue to be an offence for labels to be misleading under Article 14(1) of the Food Safety (Northern Ireland) Order 1991. The Nutrition and Health Claims Regulation, which is enforced in Northern Ireland by the Nutrition and Health

Claims Regulations (Northern Ireland) 2007³, also requires nutrition and health claims not to be false, ambiguous or misleading.

2.6. The proposed guidance would be kept under review and its impact assessed after a 3-year period. If the guidance is not serving its intended purpose, reintroducing legislation would be considered. Power under the Food Safety (Northern Ireland) Order 1991 to make regulations would be retained.

Question 1

Do you agree with the preferred option of working with industry and other stakeholders to provide guidance to describe low alcohol descriptors rather than legislate after 13 December 2018?

Yes or No? If no please provide a reason why?

3. Descriptors above 1.2% ABV

Research on New Descriptors above 1.2%

- 3.1. The FIR retained the descriptors for a period of four years to allow for further engagement with stakeholders to discuss policy proposals on the possibility of introducing new descriptors for drinks with more than 1.2% ABV, with the aim of encouraging the public to move towards drinks with a lower strength than the industry standard.
- 3.2. The DHSC hosted events with alcohol industry representatives and public health officials during the autumn of 2016 to discuss proposals. The focus was on proposals for beers, lagers, ciders and wines. Descriptors such as “reduced” or “lower alcohol” were proposed, but there was no consensus over the % ABV level at which these descriptors should apply.
- 3.3. In addition to those events, DHSC commissioned independent research on the public understanding of, and response to, the existing descriptors and potential new ones. The research studies are:
- Study 1: Impact of low alcohol verbal descriptors on perceived strength: an experimental study⁴
 - Study 2: Impact on product appeal of labelling wine and beer with (a) lower alcohol verbal descriptors and (b) % alcohol by volume: an experimental study-under review: Psychology of Addictive Behaviours (November 2017).
 - Study 3: Impact of low alcohol labels on consumption: a bar lab experiment -revised manuscript under review: Health Psychology (November 2017)
 - Study 4: Low alcohol and equivalent labels for changing selection and consumption of alcohol, food and tobacco products: a systematic review⁵.
 - Study 5: Marketing messages accompanying online selling of low/er and regular strength wine and beer products in the UK: A content analysis⁶.

³ SR 2007 No. 349

⁴ <http://onlinelibrary.wiley.com/doi/10.1111/bjhp.12273/full>

⁵ <http://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-016-3956-2>

⁶ <https://bmcpublihealth.biomedcentral.com/track/pdf/10.1186/s12889-018-5040-6?site=bmcpublihealth.biomedcentral.com>

- 3.4. Not all the studies are yet published, but we understand the evidence received so far suggests that the appeal of alcohol drinks reduces with their perceived strength (Studies 1 and 2). There were no descriptors which tested particularly well in terms of their impact on appeal. There was some evidence that lower strength alcohol labelling could increase the total volume of alcohol consumed on a single drinking occasion when compared to regular strength alternatives (Study 3). There was also some evidence that the marketing of lower strength products could encourage people to extend the number of drinking occasions, e.g. drinking lower strength products at lunchtimes when previously they might not have consumed alcohol (Study 5). The latter study also noted that some consumers found it helpful to have clear labelling of a lower alcohol product.
- 3.5. In summary, the evidence generated is limited in quantity, but it represents a significant increase in our understanding, compared to the near absence of relevant evidence before these studies were commissioned, as highlighted in the systematic review (Study 4).
- 3.6. While DHSC research conducted to date does not provide definitive support for new descriptors we are committed to the principle of increasing consumer choice, encouraging lower alcohol consumption and ensuring simplicity of information provided. Therefore, we welcome further views about how an additional descriptor above 1.2% ABV could deliver this.

Question 2: Do you have any evidence to support the case for introducing new alcoholic drink descriptors above 1.2% ABV?

Yes or No?

If Yes, please provide the descriptor name(s), research and evidence to support and at what level of % ABV they relate to.

4. Descriptors at 1.2% ABV and Below

Current Low Alcohol descriptors

- 4.1. We believe there would be advantages in providing continuity to the public and industry from using broadly the same descriptors at and below 1.2% ABV. This would provide a degree of certainty about what low alcohol products are.
- 4.2. The FLR 1996 set out conditions for use of certain low alcohol descriptors. The FIR introduced a clause to revoke those parts of the FLR 1996 on the 13 December 2018. The FLR 1996 conditions for use of four low alcohol terms/claims on drinks which would normally be expected to be alcoholic (such as beer) can be summarised as follows⁷:
- Low alcohol – product must be 1.2% ABV or below;
 - Non-alcoholic – cannot be used in conjunction with a name associated with an alcoholic drink except for communion or sacramental wine;
 - Alcohol-free – product must be 0.05% abv or below;
 - Dealcoholised – product must be 0.5% abv or lower.
- 4.3. The four descriptors have been in use since 1996 and are widely used on low alcoholic drinks. With the rise in demand for and growth in choice of low alcoholic drinks, we believe there would be advantages in providing continuity to the public and industry,

⁷ Full definitions of descriptors contained in Schedule 8 of the FLR 1996

<http://www.legislation.gov.uk/nisr/1996/383/schedule/8/part/1/made>

[See also as amended in the Food Information Regulations \(NI\) 2014 in Schedule 7 Part 2 consequential and other minor amendments coming into force on 13 December 2014.](#)

<http://www.legislation.gov.uk/nisr/2014/223/schedule/7/part/2/paragraph/1/made>

by keeping the existing descriptors for products at and below 1.2% ABV. This would provide a degree of certainty as to what low alcohol products are, and prevent confusion once the legislation ends.

4.4. There is an opportunity to consider if such descriptors still resonate with the public and industry going forward. This consultation provides an opportunity to comment on the four descriptors and provide views. The four are set out in detail in the following sections.

The Low Alcohol Descriptor

4.5. The following words, descriptor and conditions are currently set out in the FLR 1996 with regards to the description and use of the term “low alcohol”.

Words and Descriptor- *The description “low alcohol” or any other word or description which implies that the drink being described is low in alcohol.*

Conditions- *Shall not be applied to any alcoholic drink unless—*

- a) *the drink has an alcoholic strength by volume of not more than 1.2 per cent, and*
- b) *the drink is marked or labelled with an indication of its maximum alcoholic strength in required form 1,2 or 3.*

4.6. Since 1996 there has been an understanding that low alcoholic products could be described as anything from 0% to 1.2% ABV. Most products on the shelves using the low alcohol descriptor tend to be in the range of 0.5% to 1.2% ABV. We welcome views around this descriptor.

Question 3

For something to be ‘low alcohol’ the amount of alcohol needs to be 1.2% or less. Do you think we should keep this guideline?

Yes- I think we should keep 1.2% as the upper limit for low alcohol

No- I think we should make the limit lower than 1.2% for low alcohol

I don’t know

Additional Comments?

The Dealcoholized Descriptor

4.7. The following words, descriptor and conditions are set out in the FLR 1996 with regards to the description and use of the term “dealcoholised”.

Words and Descriptor- *The description “dealcoholised”*

Conditions- *Shall not be applied to any drink, unless-*

- (a) *the drink, being an alcoholic drink from which the alcohol has been extracted, has an alcoholic strength by volume of not more than 0.5 percent, and*
- (b) *the drink is marked or labelled with*
 - i. *an indication of its maximum alcoholic strength in the required form 1,2 or 3 or,*
 - ii. *in an appropriate case, with an indication that it contains no alcohol.*

4.8. Dealcoholised is a term used when alcohol is produced through the fermentation process and then removed from the final drink so it contains no more than 0.5% ABV. The descriptor tends to be used more by industry for wines rather than beers and lagers.

From research the DHSC has received and feedback from some industry representatives “dealcoholised” does not tend to resonate well with the public as a particular descriptor.

- 4.9. With the rise in the low alcohol industry and product appeal to consumers, we welcome views as to whether this descriptor should continue, and if not, what alternatives may exist.

Question 4

Should we keep the existing descriptor dealcoholised?

Yes or No?

If No, do you believe another descriptor could be used in its place and if so, what should this descriptor be called?

The

Non-Alcoholic Descriptor

- 4.10. The following words, descriptor, conditions and regulations are set out in the FLR 1996 with regards to the description and use of the term “non-alcoholic”.

Words and Descriptor-The description “non-alcoholic”.

Conditions- Shall not be used in conjunction with a name commonly associated with an alcoholic drink, except in the composite name “non-alcoholic wine” when that composite name is used in accordance with regulation 43.

Regulation 43 The word “wine”

(1) Subject to the following provisions, the word “wine” may be used in a composite name in the labelling or advertising of food for a drink which is not wine within the meaning given in point (1) of Part II of Annex VII to Regulation (EU) 1308/2013.

(2) The word “wine” shall not be used pursuant to paragraph (1) as part of a composite name which is likely to cause confusion with wine or table wine within the meaning given in point (1) of Part II of Annex VII to Regulation (EU) 1308/2013.

(3) Each word that forms part of a composite name used pursuant to paragraph (1) must appear in lettering of the same type and colour and of such a height that the composite name is clearly distinguishable from other particulars.

(4) The composite name “non-alcoholic wine” shall not be used pursuant to paragraph (1), except for a drink derived from unfermented grape juice which is intended exclusively for communion or sacramental use and which is described clearly in its labelling or advertising, as the case may be, as being exclusively for such use.

(5) When the word “wine” is used in a composite name for a drink which is derived from fruit other than grapes, that drink shall be obtained by an alcoholic fermentation of that fruit.

- 4.11. There are a variety of alcohol-free or low alcohol drinks made from grapes on the market. It may be the case that the current conditions for the use of the descriptor “non-alcoholic” are too restrictive and may not reflect the innovation in the marketplace producing alcohol-free products made with grapes, along with other ranges of other drinks such as alcohol-free beers. There are possible overlaps and confusion with this descriptor and the term “alcohol-free” which is described in the next section. We welcome views on this descriptor.

Question 5

Do you agree the term non-alcoholic should be permitted to be used otherwise than in connection with sacramental and communion wines?

Yes or No. If No, please provide a reason why.

The Alcohol-Free Descriptor

4.12. The following words, descriptor and conditions are set out in the FLR 1996 with regards to the description and use of the term “alcohol-free”.

Words and Descriptor- The description “alcohol-free”.

Conditions- Shall not be applied to any alcoholic drink from which the alcohol has been extracted, unless—

- (a) the drink has an alcoholic strength by volume of not more than 0.05 per cent, and
- (b) the drink is marked or labelled with
 - i. an indication of its maximum alcoholic strength in a form comprising of the words “not more than” followed by a figure to not more than one decimal place indicating its maximum alcoholic strength and the symbol “% vol.” (required for 1), “alcohol % vol.” (required form 2) or “alc. % vol.” (required for 3) or,
 - ii. in an appropriate case, with an indication that it contains no alcohol.

4.13. Different countries define “non-alcoholic” or “alcohol-free” differently. For example, in Sweden alcohol-free is classed as no more than 0.5% ABV, however in Italy non-alcoholic beer is defined as being equal to or less than 1.2% ABV.

4.14. Under Article 2(2) of the Licensing (Northern Ireland) Order 1996⁸, the definition of intoxicating liquor⁹ does not include liquor which is of a strength not exceeding 0.5% at the time of the sale or other conduct in question. This could be seen as contradictory to advice given that a descriptor for alcohol-free is set at 0.05% ABV.

4.15. One option would be to redefine alcohol-free as below 0.5% ABV to encourage the alcohol industry to produce more low alcohol products. However, the low alcohol industry is growing and sales of 0.05% ABV products are increasing in the UK. The Industry has demonstrated that it can produce quality products which meet the 0.05% of alcohol-free current definition, without any change to the existing definition.

4.16. It is unlikely there will be an absolute 0% ABV for these products and, in addition to meeting such a target there are everyday products on general sale which contain levels of alcohol naturally, such as vinegar and fermented fruit juices. Some of these products are higher than the alcohol-free descriptor set at 0.05%, but they do not need to include the descriptor.

4.17. It is important consumers are aware of the content of the products they are consuming and that descriptors meet public expectations. We are mindful that changing

⁸ <http://www.legislation.gov.uk/nisi/1996/3158/1rticle/2>

⁹ Intoxicating liquor and alcohol should be considered as having the same meaning in this consultation.

the description of alcohol-free or non-alcoholic to a level such as 0.5% ABV may have negative consequences for consumers.

4.18. There may be a number of reasons why people choose, or are required, to avoid alcohol and increasing the level at which a product can be defined as alcohol-free could cause difficulty for those people. For example, there are some religions where drinking of alcohol is forbidden, pregnant women need to know if the products they are using are safe to consume and not harmful, recovering alcoholics may need to avoid alcohol where it could become a gateway to drinking dependency, and drivers need a clear understanding that what they are drinking provides a safe limit. For these reasons we are not minded to change the definition of alcohol-free. We welcome your views on this descriptor.

Question 6

Do you agree that we should maintain the descriptor alcohol-free, and for this to continue at 0.05% ABV?

Yes or No

5. Impact Assessment

5.1. We are required to identify and quantify regulatory burdens to business. Initial assessment of impact on business suggests that guidance, over regulation, is likely to have no impact on business if the current descriptors are maintained. The costs will lie with us in producing and providing guidance.

5.2. Depending on the consultation outcome however, there may be views, for example to suggest some descriptors should be no longer used or alternatives may be presented. There may be costs to industry in changing labels on drinks to do so if this approach was taken. An impact assessment will be produced on any costs and benefits of the approach to be taken as part of its consultation response.

6. Equality Analysis

6.1. We are subject to Section 75 of the Northern Ireland Act 1998, and specifically, must comply with two statutory duties. The first duty is the Equality of Opportunity duty, which requires public authorities in carrying out their functions relating to Northern Ireland to have due regard to the need to promote equality of opportunity between the nine equality categories of persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependants and persons without. The second duty, the Good Relations duty, requires that public authorities in carrying out their functions relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion and racial group.

6.2. Although our approach consulting on low alcohol descriptors is to keep the existing descriptors and provide these through guidance, depending on the consultation outcome this position may change. We are therefore mindful from an equality perspective that any change in descriptors and/or the corresponding ABV% levels may impact, on the following groups:

- religious groups where drinking of alcohol is forbidden;
- pregnant women who need to know if the products they are using are safe to consume and not harmful; and
- some disabled people who might take medication that is incompatible with alcohol.

6.3. We will be interested to receive views on how our potential proposals could impact those who share a protected characteristic as this may assist us in delivering a fuller

equality analysis. Please provide any comments or submissions under Question 7 “further comments”.

7. Further Comments

7.1. Any further comments you might have about this consultation are welcomed.

Question 7 Do you have any further comments to add?	
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8. Summary of questions

Question 1: Do you agree with the FSA's preferred option of providing guidance working with industry and other stakeholders to describe low alcohol descriptors rather than legislate after 13 December 2018?
Yes or No? If no please provide a reason why?
Question 2: Do you have any evidence to support the case for introducing new alcoholic drink descriptors above 1.2% ABV.
Yes or No?
If Yes please provide the descriptor name(s), research and evidence to support and at what level of % ABV they relate to.
Question 3: For something to be 'low alcohol' the amount of alcohol needs to be 1.2% or less. Do you think we should keep this guideline?
Yes- I think we should keep 1.2% as the upper limit for low alcohol No- I think we should make the limit lower than 1.2% for low alcohol I don't know Additional Comments
Question 4: Should we keep the existing descriptor dealcoholised? Yes or No?
If No, do you believe another descriptor could be used in its place and if so, what should this descriptor be called?
Question 5: Do you agree the term non-alcoholic should be permitted to be used otherwise than in connection with sacramental and communion wines?
Yes or No. If No, please provide a reason why.
Question 6: Do you agree that we should maintain the descriptor alcohol free, and for this to continue at 0.05% ABV? Yes or No.
If No, please provide a reason why and alternative suggestions.
Question 7: Do you have any further comments?

9. Responses

- 9.1. **Responses are required by close 11 July 2018.**
- 9.2. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).
- 9.3. A summary of responses will be published on our website within 3 months of the closing date.

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours sincerely

Annie Chambers

Standards & Dietary Health Team

FSA NI

Enclosed

Annex A: Standard Consultation Information

Annex B: List of interested parties

Publication of personal data and confidentiality of responses

1. In accordance with the FSA principle of openness we shall keep a copy of the completed consultation and responses, to be made available to the public on receipt of a request to the [FSA Consultation Coordinator](#) (020 7276 8308). The FSA will publish a summary of responses, which may include your full name. Disclosure of any other personal data would be made only upon request for the full consultation responses. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at <http://www.food.gov.uk/multimedia/worddocs/dataprotection.doc>. Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.

3. In accordance with the provisions of Freedom of Information Act 2000/Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the FSA. However, we will consider your views when making this decision.

4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Further information

5. A list of interested parties to whom this letter is being sent appears in Annex B. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.

6. Please contact us if you require this consultation in an alternative format such as Braille or large print.

7. This consultation has been prepared in accordance with HM Government consultation principles¹⁰.

¹⁰ <http://www.bis.gov.uk/policies/bre/consultation-guidance>

Annex B

Ards Brewing Company	Maclvors Cider
Beer Hut Brewing Company	P.McCann & Sons Apple Cider
Boundary Brewing Cooperative	Toby's Handcrafted Cider
Bullhouse Brewing Company	Boatyard Distillery
Clearsky Brewing	Copeland Spirits
Cloughmore (Whitewater Brewery)	Hughes Craft Distillery Ltd (Ruby Blue)
Dopey Dick Brewing Company	Niche Drinks (Quiet Man)
Farmageddon Brewing Cooperative	Old Bushmills Distillery
Fifth Quarter Brewing Company	Rademon Distillery (Shortcross Gin)
Glens of Antrim Craft Ale and Beers	The Echlinville Distillery
Hilden Brewing Company	NI Drinks Industry Group
Hillstown Brewery	Hospitality Ulster
Knockout Brewing	Department of Health
Lacada Brewery Cooperative	NIFAC
Mourne Mountains Brewery	NIFDA
Northbound Brewery	BDA
Pokertree	Belfast Health and Social Care Trust
Red Hand Brewing Company	South Eastern Health & Social Care Trust
Sheelin Brewery	Northern Health and Social Care Trust
Stationworks Brewery	Southern Health and Social Care Trust
Walled City Brewery	Western Health and Social Care Trust
Whitewater Brewery	Consumer Council
Yardsman Craft Beers (Hercules Brewing Company)	United Wines
Armagh Cider Company	Retail of Alcohol Standards Group
Big Cox Cider	The Wine Company NI
Kilmegan Cider	JE McCabes
Long Meadow Cider Company	AFT Omagh