

*Should the existing regulations should be replaced with guidance?*

One suggestion within the document is to work collaboratively with the alcohol industry on the development of any such guidance. It is strongly suggest that evidence of effectiveness of industry collaborations and self-regulation of guidance are consulted before any attempts at this. There is substantial evidence to suggest that self-regulation by industry isn't effective without some external enforcement for breaches so, if industry are to be consulted on guidance, this should potentially include content of any message but not necessarily oversight. A parallel, government-led, system of enforcement this should be considered, including penalties for non-compliance.

*Should the alcohol by volume (ABV) content of low alcohol drinks should be lower than 1.2%?*

The question here is why make this change? In light of the substantial growth in sales in this sector in the last 12 months then any change should have a clear rationale and evidence base. It's difficult to see any real value in changing this level if it was arbitrarily arrived at in the first instance. A 20% growth in sales in the last year then this would suggest that these products resonate with the public so allowing this growth to continue and focusing efforts on more damaging products may make more public health sense. It is also worth considering active promotion of these products alongside advice on reducing/limiting unit consumption for those who may be currently unaware of them.

*Should the current descriptors 'alcohol free', 'non-alcoholic' and 'dealcoholised' should be changed?*

Dealcoholized is a descriptor of a production process and is likely to have little meaning to consumers so, if the aim is to simplify communication, then it may be advisable to include this is less visible information, such as ingredients, rather than as the primary message on alcohol-content. Alcohol-free and non-alcoholic are both straightforward terms, likely to be clearly understood, although testing this with consumers is advisable. Should both terms be retained, it would be preferable to ensure that they had a standard meaning for consumer clarity e.g. below 0.05% abv. Use of this would need to be regulated and feeds into the first point (above) on regulatory frameworks and the role of industry.

*An additional descriptor for alcoholic drinks which are higher than 1.2% ABV should be introduced.*

This suggestion seems highly problematic. If the suggestion is to add multiple descriptive categories, such as 'high or higher' alcohol this risks becoming very complicated in light of the variation in strength of drinks. As drinks vary from a few to over 40% abv then multiple categories would become necessary e.g. 'high, higher strength' etc. The risk of this is then implying that certain drinks are 'medium' strength, which could be counter-productive. Another system which sits alongside current unit and recommended consumption guidance is also likely to be over-complicated to consumers so, unless there is clear evidence that this will lead to positive change, it is not recommended.

A broader issue for consideration is that there's little evidence to suggest that product labelling of alcohol content impacts consumption levels for anyone who isn't already monitoring their alcohol use and diet e.g. for fitness or due to an existing health condition. This is primarily related to labelling being a post-purchase

intervention (when messages are arguably too late). There's some evidence to support on-shelf labelling and improved communication as potentially more effective (because people see it prior to purchase) and further investigation into this approach is recommended. The absence of current evidence suggests that, should this action be considered as a public health measure, it should be only one of a suite of actions aimed at promoting health benefits of reduced alcohol use, for example lower alcohol drinks as an aid to compliance with drink driving legislation, calorie control etc. Further research into positive message framing as a means to enhance promotion of low alcohol alternatives could be considered.