

# Consultation Response

Drinkaware's response to the UK Government's Consultation on updating labelling guidance for no and low-alcohol alternatives.

September 2023



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## **Drinkaware's response to the UK Government's Consultation on Updating Labelling Guidance for No and Low-Alcohol Alternatives.**

In 2023 the UK Government published [a consultation](#) on the labelling guidance for no and low-alcohol alternatives.

As the UK's leading alcohol charity, Drinkaware works in partnership with others to reduce alcohol harm across the four nations. We use our expertise to give governments, industry, communities, and individuals the knowledge and support to make informed decisions about alcohol and how to reduce the harm it can cause. It is in this capacity we submitted the following response to the consultation.

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## **RESPONSE**

**1. Do you think the upper strength threshold at which a drink may be described as alcohol free should be changed from 0.05% alcohol by volume (ABV) to 0.5% ABV?**

Yes. Drinkaware believes that no/low products have strong potential as a strategy to help drinkers moderate consumption, however public understanding of the current descriptors is low<sup>123</sup> and industry use of the descriptors is currently inconsistent.<sup>4</sup> During 2023, Drinkaware has led a campaign to improve public understanding and awareness of low/no products, while also encouraging their use as a substitute for full-strength products. Qualitative research we undertook prior to the commencement of this campaign demonstrated that there was no consensus around the terms that best describe alcohol free and low-alcohol. In quantitative research, just 26% of drinkers selected the correct definition of alcohol-free drinks and 16% for low-alcohol drinks.<sup>5</sup> Changing the definition of alcohol-free drinks from 0.05% to 0.5% would also introduce greater regulatory consistency as food products are not required to declare the alcoholic strength of those products unless they exceed 0.5% ABV.<sup>6</sup>

**2. Do you think the suggested use of the alcohol free descriptor should be expanded to apply to any drink that meets the criteria of an alcohol substitute drink (up to a specified strength threshold)? As defined in regulation 9 to The Soft Drinks Industry Levy Regulations 2018.**

Yes. While the production process for these products may provide a point of interest to the consumer, low/no products designed to emulate full-strength drinks or intended as a substitute for full-strength drinks should be subject to a consistent approach, regardless of production process. Public understanding of the current descriptors is low<sup>789</sup> and industry use of the descriptors is currently inconsistent.<sup>10</sup> Further variance of these descriptors could lead to additional confusion for consumers.

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<sup>1</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>2</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018.

<https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinkslabelling-07-03-2018/>

<sup>3</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>4</sup> Ibid

<sup>5</sup> **Drinkaware,** forthcoming: Baseline survey of people's awareness and perceptions of no and low alcoholic drinks

<sup>6</sup> **Regulation (EU) No 1169/2011**

<sup>7</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>8</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018.

<https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinkslabelling-07-03-2018/>

<sup>9</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>10</sup> Ibid

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**3. Do you think the term ‘de-alcoholised’ should be removed as a description of a product’s alcoholic strength? Drink with an ABV of 1.2% or less as defined in regulation 9 to The Soft Drinks Industry Levy Regulations 2018.**

Yes. While the production process – such as de-alcoholisation - for these products may provide a point of interest to the consumer, low/no products designed to emulate full-strength drinks or intended as a substitute for full-strength drinks should be subject to a consistent approach, regardless of production process.

Public understanding of the current descriptors is low<sup>111213</sup> and industry use of the descriptors is currently inconsistent.<sup>14</sup> When Drinkaware have communicated to the public about lower-strength and alcohol free categories, we have found that there is often confusion.<sup>15</sup> Inclusion of additional descriptions related solely to production methods could lead to additional confusion for consumers.

**4. Do you think the term ‘de-alcoholised’ should be recommended for use to indicate the production method used to reduce the alcohol content of a NoLo drink?**

No. The use of this term should be optional.

We are not aware of any research demonstrating that the inclusion or exclusion of the production process for low/no products either encourages or discourages their consumption and therefore their contribution to reducing levels of alcohol harm.

While the production process – such as de-alcoholisation - for these products may provide a point of interest to the consumer, low/no products designed to emulate full-strength drinks or intended as a substitute for full-strength drinks should be subject to a consistent approach, regardless of production process.

Public understanding of the current descriptors is low<sup>161718</sup> and industry use of the descriptors is currently inconsistent.<sup>19</sup> When Drinkaware have communicated to the public about lower-strength and alcohol free categories, we have found that there is often

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<sup>11</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>12</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018.

<https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinks-labelling-07-03-2018/>

<sup>13</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>14</sup> Ibid

<sup>15</sup> **PS Research.** (2022, June). Alcohol-free and Low alcohol drinks. Research report. Drinkaware.

<sup>16</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>17</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018.

<https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinks-labelling-07-03-2018/>

<sup>18</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>19</sup> Ibid

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confusion.<sup>20</sup> Inclusion of additional descriptions related solely to production methods could lead to additional confusion for consumers.

**5. Do you think the term ‘non-alcoholic’ should be recommended for use with a name commonly associated with an alcoholic drink?**

**For example, using the term ‘non-alcoholic beer’ if no alcohol was used in the production process and the product does not contain any alcohol, and is not used with a protected product name under regulations.**

Did not answer

**6. Do you think that products should display the ABV content on the front of the label to be able to use the alcohol free descriptor?**

Yes. Drinkaware is clear that low-strength and alcohol-free products should be promoted primarily as a means of moderating alcohol consumption or substituting that consumption. As such, these products should generally be sold and marketed in the same manner as full-strength drinks. Therefore, all alcohol-free products that emulate full-strength alcohol products should include ABV content, the 18+ logo, and the Drinkaware logo. Inclusion of the ABV will ensure those that wish to avoid alcohol completely have the necessary information.

This does not necessarily have to be on the front of the product, but should be clearly visible to consumers.

Public understanding of the current descriptors is low<sup>212223</sup> and industry use of the descriptors is currently inconsistent.<sup>24</sup>

There are many examples of good practice for physical labels; however, the provision of relevant information via online platforms is much less developed and inconsistent.

The government should also work with relevant regulators and industry bodies to ensure consistency between online and offline sales, including those that act on behalf of third-party sellers, such as delivery apps.

**7. Do you think all alcohol substitute products at 1.2% ABV and below should include the ABV content on the front of the label, irrespective of whether a low alcohol descriptor is used?**

Yes. Drinkaware is clear that low-strength and alcohol-free products should be promoted primarily as a means of moderating alcohol consumption or substituting that consumption. As such, these products should generally be sold and marketed in the same manner as full-strength drinks. Therefore, all low alcohol products that emulate full-strength alcohol

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<sup>20</sup> **PS Research.** (2022, June). Alcohol-free and Low alcohol drinks. Research report. Drinkaware.

<sup>21</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>22</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018.

<https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinkslabelling-07-03-2018/>

<sup>23</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020.

Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>24</sup> Ibid

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products should include ABV content, the 18+ logo, a pregnancy warning (for those products above 0.5% ABV), and the Drinkaware logo.

This does not necessarily have to be on the front of the product, but should be clearly visible to consumers.

Public understanding of the current descriptors is low<sup>252627</sup> and industry use of the descriptors is currently inconsistent.<sup>28</sup> Having ABV levels clearly detailed on labels will assist in consumer understanding of these categories.

The evidential basis for including, or not including, the pregnancy warning logo on labels is limited; as such, we do not offer a view on this. However, the evidence around behaviour and social norming is strong enough for us to recommend that these products should not be actively marketed to pregnant women.

#### **8. Do you think all alcohol substitute products at 1.2% ABV and below should include the ABV content at the point of their sale online, irrespective of whether a low alcohol descriptor is used?**

Yes. Drinkaware is clear that low-strength and alcohol-free products should be promoted primarily as a means of moderating alcohol consumption or substituting that consumption. As such, these products should generally be sold and marketed in the same manner as full-strength drinks. Therefore, all low/no products that emulate full-strength alcohol products should include ABV content, the 18+ logo, and the Drinkaware logo. Low alcohol products should also include the pregnancy warning.

Public understanding of the current descriptors is low<sup>293031</sup> and industry use of the descriptors is currently inconsistent.<sup>32</sup>

There are many examples of good practice for physical labels; however, the provision of relevant information via online platforms is much less developed and inconsistent. Existing statutory and non-statutory rules largely apply only to physical packaging and marketing material. While these rules have positively informed online practice, there remains gaps around applicability of these rules and the regulation of the online space.

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<sup>25</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>26</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018. <https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinkslabelling-07-03-2018/>

<sup>27</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>28</sup> Ibid

<sup>29</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>30</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018. <https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinkslabelling-07-03-2018/>

<sup>31</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>32</sup> Ibid

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The government should work with relevant regulators and industry bodies to ensure consistency between online and offline sales, including those that act on behalf of third-party sellers, such as delivery apps.

**9. Do you think the terms of use for low alcohol descriptors should be set in legislation?**

Yes. Given the current non-statutory basis of these descriptors, enforcement of their use is unclear and relies on proactive adoption by industry operators.

Public understanding of the current descriptors is low<sup>333435</sup> and industry use of the descriptors is currently inconsistent.<sup>36</sup> Further, the low-alcohol descriptor relates solely to beers and ciders, with no agreed definition of low-alcohol wines and spirits. Enforcement is also confused, with the guidance stating that local Trading Standards teams are responsible: this is impractical when descriptors are being used by multi-national producers and questionable when the descriptors are voluntary.

Internationally, there are a range of descriptors in use for low-strength alcohol and alcohol-free beer and cider products. Where descriptors are provided, many countries' definitions are set out in statute.

Many of the marketing and labelling rules in relation to these products directly emanate from the nature of the descriptors: given the descriptors are only voluntary and not statutory, this means that any attempts at regulating marketing and labelling practices are immediately weakened.

We encourage the governments of the UK to ensure consistency for these descriptors across all UK markets.

**10. What, if any, effects (monetised or non-monetised) do you think setting the terms of use for low alcohol descriptors in law would have on your business?**

Did not answer

**11. How long would it take your business to implement the legislation, if introduced?**

Did not answer

**12. Which, if any, of the CMOs' low risk drinking guidelines should be displayed on alcohol substitute drinks at or below 0.05% ABV?**

None of the guidelines. Drinkaware is clear that low-strength and alcohol-free products should be promoted primarily as a means of moderating alcohol consumption or substituting that consumption. As such, these products should generally be sold and marketed in the same manner as full-strength drinks. Therefore, all alcohol-free products

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<sup>33</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>34</sup> **Talking Retail.** MPs call for clarity on low alcohol and alcohol-free drinks labelling. 2018.

<https://www.talkingretail.com/news/industry-news/mps-call-clarity-low-alcohol-alcohol-free-drinkslabelling-07-03-2018/>

<sup>35</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

<sup>36</sup> Ibid

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that emulate full-strength alcohol products should , as a minimum, include ABV content, the 18+ logo, and the Drinkaware logo.

Alcohol-free products remain a very small part of the total alcohol market and public understanding of the low-strength and alcohol-free categories is low. Until understanding of these categories substantially increases, the Drinkaware logo should be consistently used on alcohol-free products to ensure the consumer is easily able to access relevant information. Given the high level of brand recognition, inclusion of the logo will also help to maintain the presentation of these products as adult products.

The evidential basis for including, or not including, the pregnancy warning logo on labels is limited; as such, we do not offer a view on this. However, the evidence around behaviour and social norming is strong enough for us to recommend that these products should not be actively marketed to pregnant women.

**13. Which, if any, of the CMOs' low risk drinking guidelines should be displayed on alcohol substitute drinks above 0.05% ABV and up to 1.2% ABV?**

Pregnancy and drinking. Drinkaware is clear that low/no products should be promoted primarily as a means of moderating alcohol consumption or substituting that consumption. As such, these products should generally be sold and marketed in the same manner as full-strength drinks. Therefore, all alcohol-free products that emulate full-strength alcohol products should , as a minimum, include ABV content, the 18+ logo, the pregnancy warning logo (for those above 0.5%ABV), and the Drinkaware logo.

These products are not currently required to list ABV content or health warnings, as with full-strength products. These requirements are illogical and confusing for the consumer who is not able to make informed decisions.<sup>37</sup>

Alcohol-free products remain a very small part of the total alcohol market and public understanding of the low-strength and alcohol-free categories is low. Until understanding of these categories substantially increases, the Drinkaware logo should be consistently used on alcohol-free products to ensure the consumer is easily able to access relevant information. Given the high level of brand recognition, inclusion of the logo will also help to maintain the presentation of these products as adult products.

The evidential basis for including, or not including, the pregnancy warning logo on labels is limited; as such, we do not offer a view on this. However, the evidence around behaviour and social norming is strong enough for us to recommend that these products should not be actively marketed to pregnant women.

**14. Do you think the current alcohol free descriptor threshold of 0.05% ABV in England affects the ability of UK NoLo producers to compete with producers in other countries?**

Did not answer

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<sup>37</sup> Drinkaware, 2024: Baseline survey of people's awareness and perceptions of no and low alcoholic drinks (upcoming)



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**15. Please provide evidence of how the current alcohol free descriptor of 0.05% ABV in England affects the ability of UK NoLo producers to compete with producers in other countries.**

Did not answer

**16. Do you think changes to the descriptors, if implemented, would help your business to increase availability of NoLo products?**

Did not answer

**17. Do you think changes to the descriptors, if implemented, will help to deliver government's policy aims for reducing alcohol related harms?**

Yes. Drinkaware believes that no/low products have strong potential as a strategy to help drinkers moderate consumption. However, given current low consumption rates of low-strength and alcohol-free drinks, as well as their potential limited appeal, they should not be seen as the sole, or primary, tool to reduce alcohol harm.

During 2023, Drinkaware has led a campaign to improve public understanding and awareness of low/no products, while also encouraging their use as a substitute for full-strength products. 30% of those surveyed say they want to reduce their alcohol consumption either a lot or a little over the next 12 months, higher among those with higher AUDIT-C scores.

Drinkaware's 2022 Monitor survey found some evidence to suggest that some consumers are opting for lower-strength and alcohol-free drinks as a moderation tool or a direct substitute for full-strength (and therefore, more harmful) products.<sup>38</sup> To date, there is little evidence to suggest that children, non-drinkers, lower-level drinkers or those with alcohol dependency and are in recovery are using these products as a 'gateway' to drinking or increased drinking; and there is some evidence to suggest that some consumers are opting for these products in *addition* to full-strength products<sup>3940</sup>.

**18. If implemented, do you think changes to the descriptors would affect whether consumers substitute standard-strength alcohol products with NoLo products? For example, through encouraging substitution of standard-strength alcohol with NoLo alternatives.**

Yes. We are pleased to see the Government consult on the nascent regulatory framework around low/no products to ensure the contribution of those products towards the reduction of alcohol harm is a positive one. Drinkaware is eager to be an active and supportive partner in these efforts.

Given the current evidence that consumers are opting for lower strength or alcohol-free products as a substitute for full-strength products, these products have the potential to

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<sup>38</sup> **PS Research and Drinkaware.** Pearson A., & Slater, E. (2022, November). Drinkaware Monitor 2022

<sup>39</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>40</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

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reduce levels of alcohol harm in the UK. Therefore, opportunities to expand the market should be seized upon.

Evidence from Drinkaware's annual Monitor report over recent years shows increasing numbers of adult drinkers are utilising no/low products as a means of moderating their alcohol consumption. The proportion of people opting for a lower strength alcoholic drink as a means of moderation has increased from 13% to 22% between 2017 and 2023, respectively, and the proportion opting for an alcohol-free product as a means of moderation has increased from 11% to 19%, respectively, over the same period.<sup>41</sup>

**19. What are the estimated costs associated with producing NoLo alcohol products per litre by product category?**

Did not answer

**20. How does this compare with the estimated costs associated with producing standard-strength alcohol products per litre per product category?**

Did not answer

**21. Do you think alcohol substitute drinks with a strength of 0.5% ABV or below should display an age restriction warning on label?**

Yes. To be consistent with the approach recommended here that alcohol-free products be promoted and sold in the same manner as full-strength alcoholic drinks as adult products, the 18+ logo should also be included on alcohol-free products to maintain this association. In anticipation of further evidence, we recommend a cautious approach with alcohol-free products only being sold to those over the age of 18.

As previously noted, alcohol-free products are currently a very small part of the total alcohol market and public understanding of the low-strength and alcohol-free categories is low.<sup>42</sup> Until understanding of these categories substantially increases, the Drinkaware logo, ABV levels, and age warning should be consistently used on alcohol-free products to ensure the consumer is easily able to access relevant information. Given the high level of brand recognition, inclusion of the Drinkaware logo will also help to maintain the presentation of these products as adult products.

**22. Do you think government or industry should take any other measures to prevent children and young people from accessing and consuming alcohol substitute drinks of 0.5% ABV or below?**

Yes, government and industry. Pre-existing, voluntary measures by businesses, such as Challenge 21/25 and age checks for alcohol-free products are hugely positive and help to establish these products as for adults. We also welcome some additional proactive safeguards introduced by industry bodies in relation to online sales.<sup>4344</sup>

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<sup>41</sup> <https://www.drinkaware.co.uk/research/drinkaware-monitors>

<sup>42</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>43</sup> Global standards for online alcohol sales and delivery; International Alliance for Responsible Drinking. <https://iard.org/actions/E-CommerceStandards>

<sup>44</sup> Guidance for on-line retailers of alcohol; Retail of Alcohol Standards Group. <https://rasg.org.uk/online-sales-guidance/>

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Regulators should ensure low strength and alcohol-free products are primarily marketed as substitutes for full-strength alcohol products.

Regulators could also ensure that where a low-strength or alcohol-free product shares the same branding as a full-strength product, the alcohol-free brand element be at least as prominent as the parent brand element.

**23. Do you think alcohol producers should do more to encourage consumers to substitute standard-strength alcohol with NoLo products in order to reduce alcohol harms as described in the consultation document?**

Yes. Drinkaware believes that no/low products have strong potential as a strategy to help drinkers moderate consumption. However as relatively new products with consumption currently limited, the impact low-strength and alcohol-free products may have on alcohol harm is not yet fully understood. To date, there is little evidence to suggest that children, non-drinkers, lower-level drinkers or those with alcohol dependency and are in recovery are using these products as a 'gateway' to drinking or increased drinking; and there is some evidence to suggest that some consumers are opting for these products in addition to full-strength products or consuming them in situations where they might not have previously consumed any alcoholic drink.<sup>4546</sup>

Producers should ensure low strength and alcohol-free products are primarily marketed as substitutes for full-strength alcohol products, while recognising some specific instances where this could be flexed e.g., at a pub when driving.

The evidential basis for including, or not including, the pregnancy warning logo on labels is limited; as such, we do not offer a view on this. However, the evidence around behaviour and social norming is strong enough for us to recommend that these products should not be actively marketed to pregnant women.

**24. Do you think government should do more to encourage consumers who drink above CMOs' lower risk guidelines to substitute standard-strength alcohol with NoLo products in order to reduce alcohol harms?**

Yes. The Government should develop and introduce an ambitious alcohol strategy for England to reduce alcohol harm. The recommendations contained within this response should be considered within this context.

Alcohol-free products remain a very small part of the total alcohol market and public understanding of the low-strength and alcohol-free categories is low. Until understanding of these categories substantially increases, the Drinkaware logo, age warning, and pregnancy warning (for those above 0.5% ABV) should be consistently used on low/no products to ensure the consumer is easily able to access relevant information. Given the high level of brand recognition, inclusion of the Drinkaware logo will also help to maintain the presentation of these products as adult products.

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<sup>45</sup> **Drinkaware.** Alcohol-free and low alcohol drinks in the UK. 2022. <https://www.drinkaware.co.uk/research/research-and-evaluation-reports/alcohol-free-and-low-alcohol-drinks-in-the-uk>

<sup>46</sup> **Corfe S. et al.** Alcohol-free and low-strength drinks: understanding their role in reducing alcohol-related harms. 2020. Social Market Foundation. <https://www.smf.co.uk/publications/no-low-alcohol-harms/>

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At Drinkaware we have redesigned our IBA from the ground up. This new, far more personalised tool – known as Drinking Check - can be accessed online anytime. Drinkers are invited to complete a short questionnaire and will then receive tailored advice and information based on their answers.

Outside the NHS, we are the UK's largest provider of IBAs. Our assessment and screening tools are disproportionately used by risky drinkers and so have the potential to reach those who would not regularly engage with healthcare providers.

We see our digital IBA as a critical way of helping to normalise conversations around alcohol moderation.

We encourage government to promote the Drinking Check through their relevant communication channels to the public.

**25. What outcomes do you think the government should monitor to assess whether the policy objectives set out in this consultation are being met? Include what data sources you think could be used to support this monitoring.**

Every year, Drinkaware publishes the Drinkaware Monitor,<sup>47</sup> an annual survey of the UK's drinking attitudes and behaviours. The Drinkaware Monitor survey is a long running research project conducted for Drinkaware by YouGov (in 2017-2021) and by Ipsos MORI (2009-2014). Technical reports are produced that set out the methodology used.<sup>48</sup>

A core subset of questions are included in the questionnaire every year to understand changes in key variables over time. Four reports are produced: one for the UK and one for each of the devolved UK nations. We survey more than 6,000 adults, with respondents being representative of UK adults, aged 18-85, and the findings are weighted for age, gender, social grade and region using data from the Office for National Statistics. In some years, the survey is further supplemented with qualitative interviews.

We would be happy to work with the government to develop suitable questions for inclusion such as those based around the percentage of risky drinkers who use low/no to moderate, and any changes in attitudes to these products. Results, including raw data, would be shared with the government.

**26. Do you have comments on the proposed outcome measures for monitoring the impact of proposals set out in this consultation, if they are implemented, as set out in the 'Summary of policy aims' section of the consultation?**

Did not answer

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<sup>47</sup> <https://www.drinkaware.co.uk/research/drinkaware-monitors>

<sup>48</sup> **PS Research and Drinkaware.** Pearson A., & Slater, E. (2022, November). Drinkaware Monitor 2022: Technical Report

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**27. Do you have evidence on whether the proposals set out in this consultation document, if implemented, may disproportionately affect people with protected characteristics as set out in the Equality Act 2010?**

Drinkaware has undertaken research on a range of underserved groups, including those from LGBTQ+ communities most recently.<sup>49</sup>

LGBTQ+ people and cis-heterosexual people tend to drink about the same amount of alcohol in terms of how often and how much overall. However, there are some key differences.

Few differences in drinking habits exist between LGBTQ+ and cis-heterosexual men. However, a significant disparity exists between LGBTQ+ and cis-heterosexual women, with LGBTQ+ women notably more likely to engage in hazardous drinking, particularly binge drinking, on the occasions when they do drink alcohol. LGBTQ+ women experience higher rates of alcohol-related harm compared to LGBTQ+ men and cis-heterosexual individuals.

Generally, as people grow older, they tend to reduce their risky drinking behaviour. However, among LGBTQ+ individuals, this reduction is not as pronounced as it is among cis-heterosexual individuals, suggesting LGBTQ+ people might retain riskier drinking behaviours into older adulthood.

Drinking non-alcoholic substitutes ranks high among strategies that higher risk drinkers say they could 'never' see themselves doing (both 38%), closely followed by 'drinking within the guidelines' (40% vs 32%). While these findings might initially indicate a reluctance to explore alternatives to traditional alcoholic drinks, alcohol-free products are still in their nascence, which could contribute to the reluctance to adopt them as viable substitutes for traditional alcoholic drinks.

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<sup>49</sup> Catterall, E., & Goodier, E. (2023, December). Out in the Open: Alcohol Use and Harm in LGBTQ+ Communities. Drinkaware.