

Latvian Alcohol industry association input on the Latvian TRIS notified draft amendments to the handling of alcoholic beverages law

Labelling Article 7

Latvian Alcohol Industry association (LANA) supports the idea for consumers to make informed and responsible choices, LANA have signed the MoU that was signed on 4th of June in 2019 between Spirits Europe and European commission. We also support the combination of on-label and online consumer information solution which is, the best way forward if we are to meet increasing demand for transparency. We support the idea to provide energy value on label, nutrition value and the list of ingredients on label or via electronic means, such as QR code. Thus, LANA would like to have a harmonized EU approach on labelling, instead of regulation only for the Latvian market, because this could cripple the single market and create unnecessary burden for companies working not only in the Latvian market, but also for other EU companies producing alcoholic beverages.

This law says that starting from 1st of January 2028 all the labels in Latvia should have calories on the bottle and nutrition, ingredients on the bottle or via QR code. Which means that products without the proper label cannot be sold into the Latvian market. Importers without producers do not know the number of calories in the bottle and they do not know the ingredients and nutrition on the bottle. It would also be very expensive for importers to add this information separately on the bottle by putting extra label even if the producer gives the information but does not put it on the bottle upon production. This could result that some producers in EU who will not know that Latvia has this legislation will have very limited or close to zero choices to sell the alcoholic beverage in Latvia and that would cripple the single market.

Considering that Latvian market is relatively small in comparison to the EU market, producers wanting to adapt to each countries specific labelling would be very costly and again go against the principle of single market, as differently labels, for different markets increase the costs.

Latvian Alcohol industry association considers that such issues should best be addressed via a harmonized approach at EU level as part of a future revision of the Food Information to Consumer Regulation (Regulation 1169/2011). This would ensure the smooth functioning of the single market while providing the required information to consumers and limiting supply chain disruption.

LANA would also like to emphasize that Latvian regulation would be applicable to all the bottles including those who have only 40ml, those bottles are so small that they will not have a place

for QR codes as well. According to the (MoU) Memorandum of Understanding that was signed by Spirits Europe and European Commission, there was an exclusion of small packages below 350ml, if this law is accepted that would probably make small packing in Latvia unavailable because the criteria could not be fulfilled.

Article 6 – messaging at retail shops

Concerning Article 6 with regards to sales at retail locations, the draft law adds the following wording to the Handling of Alcoholic Beverages law: *“In retail locations, a prominently displayed sign must warn that the consumption of alcoholic beverages has negative health effects, alcoholic beverages cannot be sold to minors and minors may not purchase, consume or possess alcoholic beverages.”*.

We fully support the fact that alcoholic beverages should not be sold to and consumed by minors, thus we call for a distinction to be made between harmful use of alcohol and moderate consumption: *“the **harmful** consumption of alcoholic beverages has negative health effects”*, as it is the *harmful* consumption of alcoholic beverages which cause negative health effects. The wording should be aligned with the WHO Global Alcohol Strategy, as well as the [Europe Beating Cancer Report](#) (and the [European Parliament’s Non-Communicable Diseases Resolution](#)).

Limiting the sales time

Latvian Alcohol Industry association supports the reduction of alcohol related harm and measures that are evidence-based and proportionate, thus we have to state that we believe the sales time limit is not real life evidence based measure, as for example - sales times limit was introduced in Latvia for the first time in year 2001, and we as an association have not seen how this sales time limit has contributed to the reduction of alcohol related harm, there has not been any analysis from the Latvian government regarding this introduced measure, though Latvian government wants to limit the sales time even further. Also considering the data from Covid-19 period when the sales time for alcoholic beverages and other goods was limited, we did not see any impact from the sales time limit introduction back in the Covid-19 period.

Price promotion

Latvian Alcohol industry association argues that price promotion ban would not be beneficial for the consumers as they would have limited ways to find out information about the prices of alcoholic beverages. These restrictions would also increase the administrative burden for both industry and the government control body, without clear aim of what these bans should achieve in the near future.

To conclude, Latvian Alcohol industry association supports the Latvian Government's commitment to reducing alcohol-related harm and measures that are evidence-based and

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proportionate. Thus, we believe that the government lacks clear aims on what should be achieved introducing these measures and for some restrictions there is a lack of evidence supporting the adoption of such provisions at the national level. We call on our government authorities to have labelling discussions at European level, in an open dialogue with industry to avoid single market disruptions.