

D-0722-081-MT

HOTREC concerned by Irish Act on health warning labels on alcoholic beverages

Summary

HOTREC is deeply concerned by a draft Irish Act introducing **health warning labels on alcoholic beverages**.

Ireland notified the European Commission under TRIS on 22 June 2022. We believe its scope and requirements are too extensive and disproportionate.

It would constitute **a significant burden for all hospitality establishments selling alcoholic beverages including non-prepacked drinks**.

Establishments would have to display information on calories and grams of alcohol per container and per drink in addition to health warning labels.

It would set a precedent in the EU and contravene ongoing EU legislative initiatives including the proposal on Food Information to Consumers (FIC) expected in 2023.

Background

On 21 June 2022, Ireland notified the European Commission of its intention to adopt secondary legislation on labelling of alcoholic beverages under the Technical Regulations Information System (TRIS). The draft Act requires all alcoholic beverages sold in Ireland including in hospitality to carry:

- two significant health warnings: 'There is a direct link between alcohol and fatal cancers'/'Drinking alcohol causes liver disease'
- information on calories and grams of alcohol per container and per drink
- pregnancy logos.

Impact on hospitality

The Irish Act targets **all licensed premises serving alcoholic beverages**. The smallest bar or restaurant will have to comply and provide extensive information – including for a beer on tap or a glass of house wine – on calories and grams of alcohol per container and per drink served. This would constitute a significant burden for establishments, generate costs including in working hours and staff training. If approved, the Irish Act's likely to **set a precedent and potentially lead to similar initiatives in EU member states**.

At this stage, this Irish initiative would contravene ongoing EU legislative initiatives including the proposal to revise the regulation on Food Information to Consumers (FIC) expected in 2023, fragment the single market, and complexify information provided to consumers which would become less consistent across the EU.

HOTREC is committed to providing transparent and clear information to consumers. Hospitality businesses shall not, have any active role in passing information to consumers, as products are prepacked by alcohol producers and unaltered before consumption. HOTREC consistently opposes mandatory labelling information for non-prepacked food and drinks beyond allergens. It would be too burdensome for micro-enterprises to manage. ([See HOTREC reply to FIC public consultation](#)).

Action

We encourage all associations to contact their relevant national authority and explain the potential anticipated impact on our sector. **Encourage them to submit a detailed opinion or comment under TRIS** to have the European Commission look at the consequences on the food and drink ecosystem in the single market. The deadline to submit a detailed opinion/comment via TRIS is **22 September 2022**. (More information on the TRIS procedure is attached, courtesy of Drinks Ireland).