

1<sup>st</sup> April 2016

Alcohol Policy Team  
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Department of Health  
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To Whom It May Concern

**How to keep health risks from drinking alcohol to a low level: public consultation on proposed new guidelines**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Department of Health consultation on the UK Chief Medical Officers' (CMO) new guidelines on low-risk alcohol consumption. ACS represents 33,500 local shops across the country including the Co-operative Group, Spar, Costcutter and thousands of independent retailers. In this letter we will address the implementation of the proposed alcohol unit guidelines and the effect on alcohol labelling.

Alcohol is an important part of the product mix that is sold in the convenience sector, with average alcohol sales making up 13.8% of total sales. Therefore, any changes in alcohol policy can have a considerable impact on retailers. The implementation of the new guidelines will primarily affect our members which have own-brand alcohol products, as they will have to adapt their current alcohol labelling to accommodate the new guidelines. This is a considerable burden which we do not believe had been accounted for prior to the release of the new CMO guidelines.

Retailers will need to ensure their stock features the correct labelling or face enforcement action. We welcome the Food Standards Agency letter to local authorities, which urged that no enforcement action should be taken on the "basis of out of date CMO guidance appearing on labels of alcoholic beverages" until final wording and timescales has been agreed. We recommend that a proportionate timescale is implemented to ensure retailers will have enough time to sell-through stock which have labels with out of date CMO guidance.

We urge the Government to continue to consult and work with the alcohol industry on the development of the new alcohol labelling in order to incorporate the CMO guidance. This will ensure that the changes to labelling will not disproportionately burden the alcohol industry.

For more information on our submission, please contact Julie Byers, ACS Public Affairs Executive at [Julie.Byers@acs.org.uk](mailto:Julie.Byers@acs.org.uk).

Yours sincerely

James Lowman  
Chief Executive