



**Memorandum of Understanding on the provision of nutrition  
information & ingredient listing of spirits drinks sold in the EU**

**5th Implementation Report**

**(Rollout progress from 1 January–31 December 2025<sup>1</sup>)**

*April 2026*

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<sup>1</sup> Where the most recent validated data precede the 2025 calendar year, these data are likely to reflect earlier stages of rollout. Their inclusion therefore represents a conservative approach and does not lead to an overestimation of MoU implementation.

## Executive Summary

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In June 2019, spiritsEUROPE formalised its ambition to lead voluntary action on spirits labelling in Europe, with a strong focus on energy information. In the original MoU commitment<sup>2</sup>, the sector committed to an ambitious, teared roll-out plan to seek comprehensive consumer information to be presented on spirits bottles as follows:

- 25% by 31 December 2020
- 50% by 31 December 2021
- 66% by 31 December 2022.

From the outset, the Memorandum of Understanding on the provision of nutrition information and ingredient listing of spirits drinks sold in the EU (MoU) incorporated digital solutions, reflecting an early recognition of the role that e-labelling could play in providing accessible and multilingual consumer information, and preventing barriers to the internal market and international trade. Since then, spiritsEUROPE and its members have pursued a structured and transparent approach to improving and clarifying consumer information on spirits products, with a particular focus on ingredient listing and energy information and the use of digital tools.

This 5th MoU implementation report focuses on progress made between 1 January and 31 December 2025, based on data reported by spiritsEUROPE's corporate members and a representative sample of national spirits trade associations - complemented by market validation exercises. **In summary, in 2025, corporate members of spiritsEUROPE achieved a compliance rate of 91 % of energy on-pack energy labelling in volume of products sold in the EU. In some cases, these companies who have committed to implement the MoU, reported 100% compliance.**

Since 2019, spiritsEUROPE has reported annually on the implementation of the MoU. This continued reporting goes well beyond the original commitment period of 3 years (2020, 2021 and 2022) and reflects a sustained effort to monitor progress and share evidence with public authorities and stakeholders.

Our latest report confirms the continued rollout of energy information among participating companies, engagement by national associations, and growing consumer familiarity with consumer information on label as well as digital information tools across Europe. In addition, the report sets out methodological caveats and outlines actions planned for 2026 to further strengthen implementation and evidence gathering for upcoming reports, which will be issued annually, always for the past calendar year.

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<sup>2</sup> spiritsEUROPE's Memorandum of Understanding on the provision of nutrition information and ingredient listing of spirit drinks sold in the EU - [here](#)

## 1. Introduction and Scope

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### EU Regulatory Context

The MoU operates as a voluntary, self-regulatory initiative by the spirits sector, complementing the EU's legal framework on consumer information while addressing areas where specific obligations for alcoholic beverages remain limited. Under the Food Information to Consumers (FIC) Regulation, core requirements exist for ingredient listing and nutrition information, but these provisions are not fully developed for spirits, and Member States retain some flexibility in interpretation and enforcement. The MoU leverages language-free on-pack labelling and digital solutions to ensure that consumers across all EU markets have access to consistent, reliable, and multilingual energy and ingredient information, without imposing additional administrative burden on businesses. By doing so, it reinforces the free movement of goods, reduces regulatory fragmentation, and aligns with broader EU objectives of harmonisation and proportionality. Moreover, the initiative complements recent EU developments, such as the endorsement of digital labelling options for the provision of mandatory information for wine under Regulation (EU) No 2117/2021, demonstrating that voluntary, sector-led approaches can support regulatory objectives while enabling scalable, cost-efficient consumer information solutions.

### The MoU

With the signature of the Memorandum of Understanding (MoU) in June 2019, the spirits sector, through spiritsEUROPE, established a voluntary and forward-looking framework to improve consumer information, notably on energy content and ingredient listing, while preserving the integrity of the Single Market by promoting language free on-label options and digital options where language free labels would not work, such as ingredient listing. Technology, notably geo-localisation, makes it possible to identify the location of the (potential) consumer and provide the information in the national – or any other EU – language.

As part of this commitment, spiritsEUROPE undertook to publish a series of annual implementation reports documenting rollout progress during the initial implementation phase covering the years 2020, 2021, 2022, 2023 and 2024.<sup>3</sup> While this initial phase formally concluded on 31 December 2022, spiritsEUROPE, following consultations with all signatories and the European Commission, decided to continue implementation of the MoU and to report on progress on an annual basis – voluntarily. This report therefore constitutes the 5th Implementation Report, covering rollout progress from 1 January to 31 December 2025.

The continued implementation and reporting of the MoU demonstrate the spirits sector's sustained commitment to transparent, accessible, and meaningful consumer information. By relying on uniform, language-neutral solutions, including digital tools and e-label platforms, the MoU facilitates the provision of consistent information across borders, helping to reduce administrative complexity, limit unnecessary regulatory fragmentation, and support competitiveness. In doing so, the MoU contributes to the effective functioning of the Single

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<sup>3</sup> These reports can be found [here](#) (2021), [here](#) (2022), [here](#) (2023) and [here](#) (2024).

Market, while responding to consumer expectations and complementing the EU regulatory framework in a proportionate and scalable manner.

spiritsEUROPE and its members consider the provision of information to consumers a serious responsibility, and the MoU was designed as a practical and proportionate tool, capable of being implemented across a diverse sector to deliver meaningful information to consumers.

This report is based on:

- **Data reported directly by spiritsEUROPE corporate members**, covering all participating companies and their product portfolios.
- **Evidence gathered by national trade associations**, including market audits and independent retail checks to validate coverage.
- **Independent audits and publicly available consumer research**, such as the Appinio 2024 survey and the European Commission's Joint Research Centre (JRC) 2023 QR code study, demonstrating consumer engagement and familiarity with digital information.
- **Alignment with global and EU standards**, including GS1 guidelines for QR/2D code readability and the EU wine e-label legislation effective from December 2023, illustrating regulatory convergence and sector preparedness.
- **Estimates how the reported MoU compliance translates into volumes are based on IWSR volume data from 2024.**

All information in this report demonstrates robust implementation, transparency, and consistency, reflecting the sector's leadership in operationalising digital consumer information. The MoU represents a scalable, cost-efficient, and technically feasible approach that supports both consumer choice and the effective functioning of the Single Market, while complementing EU regulatory frameworks in a practical, proportionate manner.

## **2. Backward-Looking: MoU Rollout Since 2019**

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Since the MoU's launch in June 2019, the spirits sector, through spiritsEUROPE, has taken a proactive and voluntary approach to improving consumer information through both on-label and digital solutions. At the time of launch, verified information on energy, nutrition, or ingredients was largely unavailable to consumers, who often had to rely on external, unverified sources. Today, the consumer landscape has changed significantly, with nutritional and ingredient information now widely accessible through a combination of on-pack labels and digital e-labels, providing a reliable, standardised, and easily interpretable source of information.

Progress is evident not only in the annual reports but also in tangible improvements experienced by consumers when purchasing spirits products, as demonstrated by third-party verified data from Spain (see Section 3.1. for detailed results). Nutritional and/or ingredient information is now available for over 90% of products placed on the EU market by

spiritsEUROPE corporate members implementing the MoU, enabling consumers to make more informed choices.

The MoU's approach has been acknowledged through ongoing engagement with the European Commission's DG SANTE and supported by national trade associations across EU Member States, who have actively assisted their members in implementing the commitments. E-label solutions are increasingly recognised as a trusted and reliable source of product information, a trend reinforced by the EU legal requirement for digital labels on wine<sup>4</sup>, which demonstrates regulatory acknowledgment of the value of digital consumer information. Consumer surveys, including Appinio 2024<sup>5</sup> and the JRC 2023<sup>6</sup> study, show high engagement with QR codes, confirming that the initiative is meeting consumer needs in a tangible and measurable way.

These developments highlight the MoU's effectiveness in increasing transparency, supporting responsible consumption, and enhancing the overall consumer experience across EU markets. Although overall spirits sales volumes in parts of the EU have shown modest declines (see Section 6.3), spiritsEUROPE members continue to prioritise consumer information, maintaining significant investment in label updates and digital e-labels. This demonstrates that providing accurate, accessible, and reliable information remains a core sector commitment, even in a challenging market environment.

Looking back to the original MoU commitments<sup>7</sup>, the sector collectively aimed to reach:

- 25% of spirits sold by 31 December 2020
- 50% by 31 December 2021
- 66% by 31 December 2022

These milestones continue to serve as benchmarks when assessing progress over time, providing a clear framework to monitor both uptake and ongoing impact.

Since the MoU's launch, the number of corporate co-signees has grown by 33%, and national trade associations have actively supported their members in implementing the commitments, demonstrating that the initiative has mobilised broad participation across the sector. In parallel, consumer access to reliable digital information has expanded, reflecting both the sector's operational capacity and its commitment to transparency

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<sup>4</sup> Regulation (EU) No 2117/2021 amending wine labelling rules - from 8 Dec 2023, ingredients and nutritional information must be provided either on wine labels or via digital means (QR)

<sup>5</sup> spiritsEUROPE, Appinio 2022 survey of 5 000 consumers across CZ, FR, DE, IT, ES; 75 % had scanned a QR code on a food or drink product, nearly half regularly. [Full results.](#)

<sup>6</sup> JRC behavioural study *Using QR Codes to Access Food Information*, JRC (Nov 2023) - data on consumer QR scanning behaviour in Spain, Germany and Bulgaria. [JRC QR Code Study on Food Information \(EU Publication Office\)](#)

<sup>7</sup> spiritsEUROPE's Memorandum of Understanding on the provision of nutrition information and ingredient listing of spirit drinks sold in the EU - [here](#)

## 2.1 Corporate Member Reporting

In 2026, 10 international companies reported on their individual MoU rollout since the last round of data collection in 2024: Bacardi Limited; Diageo plc; Mast-Jägermeister SE; Pernod Ricard SA; Moët Hennessy; Rémy Cointreau SA; The Edrington Group; William Grant & Sons Ltd; Brown-Forman as well as Suntory Global Spirits & Wine Ltd. Both, MoU co-signees and non-signees contributed to the data collection efforts by spiritsEUROPE.

These companies on average reported 86% energy-on-pack compliance, equivalent to 91% in volumes sold, and in some cases, this reaches 100%.

Reported figures relate to participating companies and their respective brand portfolios. These companies represent a significant share of spirits volumes placed on the EU market, plus Norway, Switzerland and the UK (around 44%) and have played a leading role in operationalising the MoU.

## 3. National Association Reporting and Market-Level Evidence: Spain, France and Ireland and other markets

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In parallel to company reporting, spiritsEUROPE has worked closely with national trade associations to gather complementary evidence on MoU rollout at market level. This approach recognises the important role of national associations in cascading the MoU to smaller producers and distributors.

### 3.1. Spain

Spain is a strategically important market within the EU spirits sector due to its size, consumer base, and exposure to both domestic and international consumption patterns. In 2023, the Spanish spirits market was valued at approximately €2.2 billion, making it one of the largest spirits markets in Europe.<sup>8</sup> Spain welcomed over 85 million international visitors in 2023, further increasing consumer exposure to spirits products in retail and hospitality channels.<sup>9</sup>

The consumer base in Spain is diverse and engaged, with spirits forming a significant part of social drinking and hospitality culture. Despite this, total spirits consumption in Spain declined from 2022 by around 5.9 % to 187 million litres in 2023, reflecting broader shifts in consumption patterns.<sup>10</sup> Importantly, this decline has not affected spiritsEUROPE members' commitment to providing consumers with accurate and accessible product information, with companies continuing to invest in label updates and digital e-labels.

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<sup>8</sup> DBK Observatorio Sectorial (Informa), *Bebidas Alcohólicas* (Dec 2023), estimating the Spanish spirits market at approximately €2.2 billion. [Link](#)

<sup>9</sup> AP News: Spain received over 85 million international tourists in 2023. [Link](#)

<sup>10</sup> Espirituosos de España socio-economic report (2023), showing total spirits consumption fell to 187 million litres, a decline of 5.9 %. [Link](#)

In the context of digital consumer information rollout, Spain provides robust third-party validated evidence of progress, initiated, overseen and financed by Espirituosos España. An independent audit, conducted four times a year under the leadership of the Spanish national association Espirituosos España, found that in November 2025, 46 % of spirits drinks sold already featured a QR code on the label providing online ingredient and nutritional information, up from 17 % in June 2023. In addition, 78 % of products placed on the Spanish market by direct spiritsEUROPE member companies were reported to feature nutritional information on label in line with the MoU.

This frequent audit schedule ensures high-quality, reliable monitoring, capturing both the pace and scale of rollout across different brands and product types. The results demonstrate that the MoU has successfully increased transparency and consumer access to relevant information, even in a market where overall sales volumes have modestly declined. Spain's experience illustrates that digital and on-pack consumer information can be implemented effectively at scale, supporting informed consumer choice and reinforcing the sector's proactive role in responsible consumption.

As already highlighted in the 2024 report, store-check based audits provide a useful indication of market trends while recognising that they capture only a snapshot of products available at a given moment in time. spiritsEUROPE is exploring the feasibility of applying a similar independent validation methodology in other EU markets, in cooperation with national associations.

### **3.2 France**

The French national association has collected preliminary data from its members on the rollout of energy information and digital labelling in line with the MoU. The Fédération Française des Spiritueux (FFS), representing a broad and diverse range of companies active on the French market, has at this stage received responses from 24 member companies (excluding the largest multinational operators). Based on this initial dataset, approximately 35% of spirits volumes already feature energy information and digital access to ingredient and nutritional information. More specifically, around 34.8% of reported volumes include energy information on the label, while 35.7% include a QR code providing online ingredient and nutritional information. Together with the cooperate spiritsEUROPE company members, 74,5% of total spirits volumes sold in France should have either energy information on the label or energy information on the label and a QR code linking to online ingredient and nutritional information.

These findings, while partial, indicate meaningful uptake of the MoU among a broad range of companies operating in the French market, including small and medium-sized producers. They also suggest that implementation is progressing beyond the largest market players, contributing to wider availability of consumer information across different segments of the market.

### **3.3. Ireland**

Ireland represents an important market for assessing the implementation of the MoU, given the strong presence of both domestic and international spirits producers and a well-developed retail and hospitality landscape. The Irish market is characterised by high levels of consumer engagement with spirits products and a competitive environment that mirrors broader EU trends.

Sector estimates indicate that companies representing a substantial portion of the Irish spirits market account for around 81% of the total market share, reflecting broad coverage by the national industry grouping. Based on this representation, it is estimated that approximately 77% of total spirits volumes placed on the Irish market are expected to fall in the scope of MoU implementation.

This high level of participation underlines the capacity of the Irish sector to implement consumer information commitments at scale. The mix of established local producers and major international brands operating in Ireland supports a consistent rollout of the MoU across a diverse set of products available to Irish consumers.

Progress in Ireland therefore serves as a meaningful reference point for understanding how the MoU can deliver accessible and consistent consumer information in a competitive market setting with substantial volumes. It also complements experience in larger markets, such as Germany, by illustrating how coordinated industry action can drive implementation in a smaller but highly active spirits market.

### **3.4. Other Markets**

Although comprehensive data is not yet available for all EU Member States, spiritsEUROPE continues to encourage national associations to collect and share evidence in a structured manner. Over the past five years, the association has supported this process through workshops, webinars, and peer-to-peer exchanges. spiritsEUROPE's efforts extend beyond the formal membership of spiritsEUROPE and, in some cases, beyond the EU, reflecting broader sectoral support for the MoU's approach to consumer information and its relevance across different regulatory and market contexts.

#### **United Kingdom**

The United Kingdom represents a key market for assessing the implementation of the MoU, given its size, diversity, and the strong presence of both domestic and international spirits producers. The UK market is characterised by a highly competitive retail and hospitality landscape, alongside significant consumer engagement with spirits products, reflecting broader European consumption patterns.

Sector estimates indicate that the largest companies account for approximately 65% of total spirits market volume in the UK. Based on this representation, it is estimated that around 56% of total spirits volumes placed on the UK market are expected to fall within the scope of MoU

implementation. Among the largest companies, approximately 86% of their volume is estimated to be in scope.

This level of participation highlights the ability of a significant share of the UK spirits sector to implement consumer information commitments at scale. The presence of both major international groups and well-established domestic producers supports a consistent and coordinated rollout of the MoU across a wide range of products available to UK consumers. In markets such as the United Kingdom, large manufacturers have continued to take action to provide consumer information on-label in line with the MoU. This has further catalysed the longstanding efforts of The Portman Group and reinforces the role that sector associations and self-regulatory organisations can play in driving implementation.

Progress in the United Kingdom therefore provides an important reference point for understanding how the MoU can be implemented in a large and highly competitive market. It complements developments observed in other markets by demonstrating how industry coordination can drive meaningful uptake even in complex and dynamic commercial environments.

#### **4. Consumer Engagement with Digital Information**

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The behavioural study *Using QR Codes to Access Food Information*, published by the European Commission's Joint Research Centre (JRC) in November 2023, found that a substantial share of consumers in key EU markets have experience with QR codes. Around two-thirds of respondents reported having scanned a QR code on a food product at least once, with 66 % in Bulgaria, 69 % in Germany, and 83 % in Spain indicating they had done so.

The study further showed that consumers across these countries expressed a positive attitude toward the presence of QR codes on food products, and that scanning behaviour was not significantly influenced by education, age, income, or place of residence, underscoring broad familiarity with digital access to product information.<sup>11</sup>

These findings support the relevance of digital solutions as a complement to on-pack information. In parallel, consumer, regulatory and market developments suggest that demand for accessible product data will continue to grow among EU consumers.

In the EU regulatory context, new labelling rules for wine have introduced mandatory provision of ingredients and full nutritional information either on the physical label or through digital means such as a QR code. As of 8 December 2023, Regulation (EU) No 2117/2021 requires that all wines and aromatised wine products marketed in the EU include a list of ingredients and a full nutrition declaration either on-label or via an electronic label accessed by QR code.<sup>12</sup> This change makes the online provision of detailed product information an expected and increasingly widespread consumer practice.

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<sup>11</sup> JRC behavioural study *Using QR Codes to Access Food Information*, JRC (Nov 2023) - data on consumer QR scanning behaviour in Spain, Germany and Bulgaria. [JRC QR Code Study on Food Information \(EU Publication Office\)](#)

<sup>12</sup> Regulation (EU) No 2117/2021 amending wine labelling rules - from 8 Dec 2023, ingredients and nutritional information

Anticipating this trend, the European spirits sector, working proactively through spiritsEUROPE and in cooperation with the European wine sector represented by the Comité Européen des Entreprises Vins (CEEV), remains committed to facilitate the use of QR-codes amongst its members, for instance by *U-label* by ScanTrust. The platform, pioneered and developed hand in hand by wine and spirits representatives, continues to enable companies of all sizes to create tailored, multilingual e-labels that provide EU consumers with comprehensive product information accessible via a QR code on the bottle. The platform is designed to be simple, secure and cost-efficient. In line with spiritsEUROPE's commitment to responsible and consumer-focused information, SMEs are specifically catered for in terms of pricing and support materials.<sup>13</sup>

Since the launch of U Label in September 2022, the platform has supported the creation of a total of 113,503 labels across 2,687 companies, including 3,821 spirits codes generated by 292 spirits companies and 109,682 labels for wine and aromatised wine from 2,395 companies. This aggregated data demonstrates the rapid uptake of digital labelling and the sector's ability to operationalise QR codes and e-labels at scale. The adoption of e-labels across both spirits and wine illustrates the technical capacity, commitment to transparency, and focus on providing consumers with reliable, accessible energy and ingredient information in a cost-efficient and scalable manner.

Evidence from a representative consumer survey commissioned by spiritsEUROPE in 2022 (Appinio, 5,000 respondents across Czechia, France, Germany, Italy, and Spain) shows that 75% of respondents have scanned a QR code on a food or drink product, with nearly half doing so regularly<sup>14</sup>. The survey indicates that QR codes are widely recognised as convenient, readable, and useful tools for accessing detailed product information, including nutrition and ingredients. Around half of respondents also use apps to access product data, demonstrating a broader shift toward digital engagement.

The survey further highlights strong consumer support for regulatory clarity: 87% of respondents would welcome clear rules to ensure that digital product information is accurate and trustworthy, underscoring the MoU's role in providing a harmonised and reliable system for digital consumer information across the spirits sector.

Also globally, digital consumer information is becoming increasingly important. GS1 has set an ambition that retail point-of-sale systems worldwide should read 2D barcodes, including QR codes, by 2027 (*Ambition 2027*).<sup>15</sup> Pilots in over 48 countries show strong industry support for using QR codes to provide consumers with product data efficiently and reliably.<sup>16</sup>

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must be provided either on wine labels or via digital means (QR)

<sup>13</sup> spiritsEUROPE & [CEEV U-label initiative](#) - sector-driven platform developed to support multilingual, marketing-free e-labelling, offering a scalable solution for spirits and wine producers.

<sup>14</sup> spiritsEUROPE, Appinio 2022 survey of 5 000 consumers across CZ, FR, DE, IT, ES; 75 % had scanned a QR code on a food or drink product, nearly half regularly. [Full results](#).

<sup>15</sup> GS1, *Ambition 2027 for Retail – 2D barcode readiness*, GS1.org

<sup>16</sup> GS1, *Industry support for QR codes with GS1 standards*, GS1.org

This aligns closely with the spirits sector’s MoU, which has already operationalised QR codes and e-labels to provide energy and ingredient information in a scalable, cost-efficient way. The *U-label* platform allows companies to deliver verified, multilingual product information via QR code, anticipating both consumer expectations and emerging global standards.<sup>17</sup>

Independent retail audits in 2024 found that around 30% of spirits products sampled carried a QR code<sup>18</sup>. While company-reported rollout under the MoU is higher, QR code presence and MoU coverage can be influenced by supermarket shelf depletion, as older stocks without codes may still be available. This highlights the value of company reporting complemented by third-party verification, ensuring a more accurate picture of consumer access to digital information – as elaborated on in section 5.

## **5. Forward-Looking: Priorities for 2026**

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The spirits sector remains firmly committed to providing reliable, accessible, and harmonised consumer information, enabling informed food and beverage choices across the Single Market. Building on the progress achieved to date, spiritsEUROPE will focus in 2026 on measures that strengthen consistency, comparability, and transparency in MoU implementation while avoiding unnecessary national divergences or duplication.

Building on the progress achieved to date, spiritsEUROPE intends to focus on activity-based measures in 2026:

- Continue and expand the number of co-signees to the MoU, including additional companies and national associations across the EU and EU+ markets, to reinforce a coordinated sector-wide approach.
- Continue and expand market-level validation beyond Spain to additional Member States, providing independently verified evidence of rollout and ensuring cross-market comparability.
- Supporting national associations in collecting more consistent and harmonised data, including both on-label and digital information, facilitating standardised reporting across the Single Market.
- Continued engagement with corporate members through technical exchanges, preparing separated reporting streams for EU and EU+ markets while avoiding redundant national requirements.
- Further development and promotion of digital labelling tools, including support materials such as instructional videos, to enable cost-efficient, secure, and consistent deployment of both on-label and e-label information across the sector.

These initiatives are designed to deliver measurable benefits to consumers, providing clear, accurate, and comparable information whether accessed directly on the product label or via digital tools, regardless of where products are sold in the EU. Results from expanded

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<sup>17</sup> GS1, *2D Barcodes at Retail Point-of-Sale Implementation Guideline*, GS1.org

<sup>18</sup> Kokole D, Neufeld M, Correia D, Rehm J, Pettigrew S, Paradis C, et al. *Beyond the label: analyzing the presence and information behind the QR codes on alcohol containers in 13 European countries*. *International Journal of Drug Policy*. 2025; 142:104862. <https://doi.org/10.1016/j.drugpo.2025.104862>

validation and engagement activities are expected to be reported in early 2027, contributing to a harmonised, transparent, and scalable consumer information framework across European markets.

### ANNEX 1: CAVEATS AND LIMITATIONS

The interpretation of figures in this report should consider:

1. Changes in spiritsEUROPE membership and company portfolios over time
2. Differences in geographic scope used by companies when reporting
3. Market context — spirits sales volumes

#### 6.1. Changes in spiritsEUROPE membership and company portfolios over time

The composition of spiritsEUROPE's membership and the brand portfolios of its corporate members naturally evolve over time due to factors such as market entry and exit, mergers, acquisitions, and product line adjustments. These changes can influence the reported coverage of energy and ingredient information on spirits products. While such shifts may affect the absolute number of products or the geographic coverage included in the MoU reporting, the sector's overall commitment to providing consumers with transparent and consistent information remains unchanged. spiritsEUROPE continues to monitor these dynamics and adapts its reporting guidance to ensure that comparability and reliability of data are maintained across years.

#### 6.2. Differences in geographic scope used by companies when reporting

Within the MoU, some companies report rollout data for EU-27 markets only, while others include additional territories such as the UK, Switzerland, and Norway. These differences reflect company-specific internal processes and accounting practices. spiritsEUROPE recognises the importance of consistency and comparability in reporting and will continue to engage with its members to encourage a more uniform approach to data submission. While these variations do not affect the overall trends or the sector's commitment to the MoU, harmonised reporting will improve transparency and support more accurate monitoring of rollout progress across the EU.

#### 6.3. Market context — spirits sales volumes

In parts of the EU, overall spirits sales volumes have shown modest declines or pressure in recent periods, which should be considered when interpreting percentage-based rollout indicators. Short-term industry data indicates that EU spirits category volumes were down ~-2.9%<sup>19</sup> in the latest reported periods, with national data (e.g., Germany) showing volume sales down ~-5.5% in 2024<sup>20</sup>. What is the base year for the % decline?

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<sup>19</sup> NielsenIQ / CITI: European spirits volumes down -2.9% overall (Sep 2025) - [here](#)

<sup>20</sup> NielsenIQ: German spirits volumes down -5.5% (2024) - [here](#)

Independent beverage market research also highlights a -1.8% <sup>21</sup> slip in alcoholic beverage sales value across major European markets, while non-alcoholic categories grew. Long-term sector analysis shows a decline in total spirits volumes over the past decade.<sup>22</sup> These trends reflect shifting consumer behaviour and moderation in alcohol consumption and may influence the interpretation of rollout figures but do not undermine the implementation efforts under the MoU.

spiritsEUROPE remains committed to transparency and to continuously improving the robustness of the evidence base underpinning the MoU.

## **ANNEX 2: METHODOLOGY AND ACKNOWLEDGEMENTS**

### **Monitoring and Validation Methodology**

Implementation data in this report are derived from corporate member reporting and market-level audits conducted by national associations. While company-reported figures cover broad product portfolios, independent audits (for example, in Spain) provide additional verification. Differences in methodology, sample timing, and geographic scope mean that figures should be interpreted as indicative rather than fully comprehensive.

spiritsEUROPE continues to work with national associations to expand independent market-level validation across additional Member States, improving transparency, comparability, and confidence in reported rollout progress.

### **Use of AI tools**

AI-based tools were employed to support text structuring, summarisation of survey findings, and language clarity. All figures, data interpretations, and conclusions are based on verified sources and company-provided information, and the final content was reviewed and approved by spiritsEUROPE staff.

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- External partners and research providers, including Appinio, U-Label by Scantrust and the European Commission's Joint Research Centre (JRC), for providing survey data referenced in this report.

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<sup>21</sup> Circana: European alcoholic beverage sales slipped -1.8% while non-alcoholic grew - [here](#)

<sup>22</sup> spiritsEUROPE: Long-term EU+ spirits volume decline >5% (2008–2019) – [here](#)