Dietitians Australia

Submission to FSANZ Proposal P1059 – Energy Labelling on Alcoholic Beverages

Response to consultation
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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8500 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for food and nutrition for healthier people and healthier communities.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in the food system to support consumers in making healthy food choices.

This submission was prepared by members of the Dietitians Australia Food Regulatory and Policy Advocacy Working Group following the Conflict of Interest Management Policy and process approved by the Board of Dietitians Australia. Contributors include Dietitians Australia members with wide ranging expertise in areas including public health, food systems, food industry and academia.

Dietitians Australia welcome the opportunity to provide a submission to the Food Standards Australian and New Zealand (FSANZ) consultation on proposal P1059 regarding energy labelling on alcohol beverages. Dietitians Australia support the implementation of standardised, mandated, evidence-informed energy labels on alcoholic products to help support Australians to make informed dietary decisions.

Summary

It is the right of consumers to make informed choices about the products they purchase, and it is the obligation of public institutions to ensure consumers are able to do so.

Providing consumers with information about the energy content of alcoholic beverages is a potentially important way of helping them reduce their energy intake. It is not unreasonable that consumers are given this information just as they are for foodstuffs.

Dietitians Australia strongly support the implementation of evidence-based policies to reduce the rates of overweight and obesity in Australia, including the introduction of energy labels. In particular, Dietitians Australia support the following aspects of the FSANZ proposal:

- to require the energy content on alcoholic products be provided in kilojoules,
- to require energy content information be provided on alcoholic beverages per 100ml of the beverage, and
- to apply the information consistently to all categories of alcoholic products.

Dietitians Australia strongly support a government-led mandatory approach to legislation for all food and beverage policies, including mandatory energy labelling on alcoholic products.

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Mandatory standardised on-label energy information for alcoholic products

Dietitians Australia support the FSANZ proposal to mandate standardised on-label energy information for alcoholic products.

Regular alcohol consumption can impact health and well-being and can be a contributor to weight gain, overweight and obesity.[1-7]

The National Obesity Strategy 2022-2032,[8] identifies alcohol consumption as a risk factor for weight gain, overweight and obesity and states two strategies for immediate action:

Strategy 1.5 Improve nutrition information to help consumers make healthier choices at the of purchase; consider other policies or regulations to support people to make healthier food and drink choices (such as information on unhealthy ingredients including added sugar, salt, saturated and/or *trans* fats, alcohol) and,

Strategy 2.1 Improve people's knowledge, skills and confidence to lead active lives and to buy, prepare and enjoy health foods and drinks; provide engaging information, education, and skill-building initiatives, including online, that promote and align with the Australian guidelines for healthy eating, alcohol, physical activity, sedentary behaviour and sleep, with further tailoring of messages and information for priority groups and life stages.

Labelling provides a unique opportunity for governments to disseminate health messages and key information at the point of sale and point of consumption. Placing health information on alcoholic beverages, containers, and packaging targets the appropriate audience (the drinker) at the appropriate time (when purchasing and using the product).[9]

Government-led, mandatory alcohol product labelling may be a valuable public health strategy to mitigate the contribution alcohol has to excess energy intake and consequently may reduce alcohol-related harm. Over 200 health conditions are linked to harmful alcohol use, ranging from liver diseases, road injuries and violence, to cancers, cardiovascular diseases, suicides, tuberculosis and HIV/AIDS.[10] In 2018, alcohol contributed to 4.5% of the total burden of disease and 15% of the overall burden of injury in Australia.[11]

Format of energy labelling

Dietitians Australia support the following FSANZ proposals regarding the format of energy labelling:

- to require the energy content on alcoholic products be provided in kilojoules,
- to require energy content information be provided on alcoholic beverages per 100ml of the beverage, and
- to apply the information consistently to all categories of alcoholic products.

Tabular format consistent with Nutrition Information Panel

Dietitians Australia support the presentation of energy information in the form of a standardised truncated nutrition information panel (NIP) which presents the energy content of an alcoholic beverage in kilojoules.

Evidence indicates consumers generally have a poor understanding of the energy content of alcoholic beverages and do not understand alcohol is the main source of energy in most alcoholic beverages. There is, however, demand among consumers to receive this information.[12-17]

Unit of measure

Dietitians Australia support energy information being provided for all alcoholic products per 100ml. Providing energy content per 100ml for all alcoholic products will enable standardised and direct comparison across alcoholic products, in a format that people are familiar with. It will also enable standardised comparison between alcoholic and non-alcoholic products, which may facilitate understanding that alcohol is high in energy.

Given the World Health Organization guidance when it comes to alcohol consumption, is that: there is no safe amount that does not affect health,[18] Dietitians Australia support the concerns noted in the proposal regarding energy information 'per serving'.

Percentage Dietary Intake

Dietitians Australia do not support the inclusion of percentage daily intake (%DI). While this is an effective tool used on food items and menus in Australia to highlight energy contribution to overall daily intake for an adult, it is not appropriate for use in the context of alcohol and is inconsistent with national alcohol guidelines.[19]

Providing reference to a product's contribution to overall energy intake is inconsistent with national alcohol guidelines and may imply equivalence with nutritious foods that should comprise daily energy intake.

Use of the average reference value of 8700kJ for adults presents a higher risk for overconsumption for some adults, particularly those with lower-than-average body weight and women who are more susceptible to alcohol-related brain damage and heart disease than men. Studies show women who have one drink a day increase their risk of breast cancer by 5% to 9% compared with those who abstain.[20-22]

There is little evidence to support the provision of %DI, particularly given consumers find this information difficult to understand.[23]

Application of energy labelling

Dietitians Australia recommend that there should be no exemptions for energy labelling of pre-packaged alcohol products – for example: cellar doors, breweries, delivered packaged and ready for consumption.

The growing digitalisation of food environments has increased convenience and access to foods and beverages via online services offering contact-free delivery. The online delivery service sector of the alcohol market accounts for approximately 5% of all sales and is increasing by at least 10% annually.[24] Moreover, alcohol e-commerce in Australia reportedly experienced an increase of over 500% in sales after the onset of COVID-19, relative to the previous year.[25] Given the growth of alcohol delivery services in Australia, these services should not be exempt from mandatory energy labelling requirements.

Application to different types of packages for retail sale

Dietitians Australia advocate for energy labels to be included on all layers of packaging. When labelling is only included on one layer of packaging, there is potential for information to be lost, as is often the case with multipacks where the outer layer of packaging is discarded. Of concern, purchases of multipacks may have increased in popularity during COVID-19 in relation to stockpiling behaviours observed.[26] In a Nielsen report, sales of 24-packs were reported to have increased by 24% in 2020.[27] Moreover, ability to buy alcoholic products in bulk may be enhanced through alcohol delivery services.

When outer layers of multipack packaging are discarded - whether by retailers or individuals, consumers are unable to access energy information at point of purchase or use and therefore unable to make informed decisions. To mitigate this, energy labelling requirements should be applied to individual beverages in addition to the outer layers of packaging.

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Consideration of costs and benefits

Dietitians Australia strongly support the proposed benefits of energy labelling on alcoholic beverages for weight gain, overweight and obesity prevention. However, there is recognition that the proposal could be further strengthened by considering the benefits of reducing other alcohol-related harms. Over 200 health conditions are linked to harmful alcohol use, ranging from liver diseases, road injuries and violence, to cancers, cardiovascular diseases, suicides, tuberculosis and HIV/AIDS.[10]

The provision of energy labelling on alcoholic beverages may lead to a decrease in alcohol consumption or preference for products with a lower alcohol content by consumers. These subsequent actions may be beneficial for preventing excess energy intake and therefore weight gain, overweight and obesity. However, total reduction in alcohol consumption can also lead to a lower blood alcohol content, which can reduce alcohol-related harms.[28]

Conclusion

Alcoholic beverages benefit from special treatment. At present, they are exempted from international conventions that govern all other psychoactive substances and from key food legislation that requires labelling of ingredients and nutritional information. Among the various tools and policy options that could be implemented to raise awareness of the risks of alcohol use – including weight gain, the World Health Organization have long called for the consideration of mandatory content and nutritional labelling. This call is now also articulated in the National Obesity Strategy.

Dietitians Australia strongly support the work of FSANZ and acknowledge the robust action undertaken to date on this important strategy which will benefit the health of all Australians.

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