

20 March 2023

Email: submissions@foodstandards.gov.au

**Submission to Food Standards Australia New Zealand
On Proposal P1059: Energy labelling on alcoholic beverages**

DB Breweries is a wholly owned subsidiary of HEINEKEN NV, and manufactures beer, cider, and ready-to-drink products (RTDs) at facilities in Ōtāhuhu, Nelson, Paraparaumu, and Timaru.

We believe it is important that consumers are well-informed about alcohol, our products and how they can be enjoyed responsibly. We make sure to emphasise this on our packaging, in our advertising and promotions and through our partnerships.

DB submits the following comments on the proposal.

DB Breweries supports the proposal to amend the Australia New Zealand Food Standards Code to require energy (kilojoule) content information to be provided on packaging for beverages containing alcohol that are currently exempt from the requirement to be labelled with a NIP, being:

- standardised alcoholic beverages and
- beverages containing no less than 0.5% alcohol by volume (ABV) that are not standardised alcoholic beverages.

We agree that mandatory energy labelling would provide greater coverage and consistency for consumers to make informed choices.

In line with HEINEKEN's global labelling policy and commitment to transparency, DB is working to provide ingredient and nutritional information, including energy, on all company (non-)alcoholic beers, ciders, and other beverages by 1 January 2024.

DB already displays a NIP on more than 95% of our products and will reach 100% compliance with the HEINEKEN policy by July 2023.

We therefore support the proposal to retain permission for the voluntary provision of a NIP on the label of beverages containing alcohol.

We also strongly support the proposal to exempt alcoholic beverages that are already labelled with a NIP in accordance with Standard 1.2.8 from the scope of energy labelling requirements.

Position on labelling

DB provides a nutrition information panel in a tabular format that consumers are familiar with on more than 95% of our products, whether they make a claim or not.

We support the recommended format to provide energy information in kilojoules and on a 100mL and per serve basis as this aligns with our current practice. We also provide information in kilocalories. We support the proposal that percentage daily intake may be included voluntarily using the prescribed format.

We believe it is important to have a common reference measure of 100mL for ease of comparison for New Zealand and Australian consumers.

Primary label

Nutrition Information
Servings per package: 1
Serving size: 330 mL

	Average Qty per Serving	Average Qty per 100 mL
Energy	581 kJ (139 Cal)	176 kJ (42 Cal)
Protein	1.3 g	LESS THAN 1 g
Fat, total	LESS THAN 1 g	LESS THAN 1 g
- saturated	LESS THAN 1 g	LESS THAN 1 g
Carbohydrate	10.6 g	3.2 g
- sugars	LESS THAN 1 g	LESS THAN 1 g
Sodium	7.3 mg	2.2 mg

NATURAL INGREDIENTS:
WATER, MALTED BARLEY, HOP EXTRACT.
WWW.HEINEKEN.COM

RAISED BY
THE WORLD

18+

ENJOY RESPONSIBLY

GLASS

FOR ALCOHOL & HEALTH
INFORMATION SCAN
QR-CODE OR VISIT
HEINEKEN.COM

Help us recycle

APPROX.
1.3

Standard
Drinks™

2205525

Secondary pack

15 x 330mL • 5% ALC/VOL

15 x

APPROX.
1.3

 Standard
Drinks™

BEER

NATURAL INGREDIENTS: WATER, MALTED BARLEY,
HOP EXTRACT

Nutrition Information
Servings per package: 15
Serving size: 330 mL

	Average Qty per Serving	Average Qty per 100 mL
Energy	581 kJ (139 Cal)	176 kJ (42 Cal)
Protein	1.3 g	LESS THAN 1 g
Fat, total	LESS THAN 1 g	LESS THAN 1 g
- saturated	LESS THAN 1 g	LESS THAN 1 g
Carbohydrate	10.6 g	3.2 g
- sugars	LESS THAN 1 g	LESS THAN 1 g
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ENJOY RESPONSIBLY

18+

Help us recycle

BREWED UNDER SUPERVISION OF HEINEKEN BROUWERIJEN,
AMSTERDAM, THE NETHERLANDS BY DB BREWERIES LTD.,
1 BAIRDS ROAD, AUCKLAND, NEW ZEALAND. FOR CONSUMER
INFORMATION (WITHIN NEW ZEALAND) CALL 0800 102 337.

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A NIP is a recognised format for sharing nutritional information in global markets. Displaying ingredients and nutrition information, including energy, on all packaging also aligns with EU legislation.

Given the global nature of alcoholic beverage SKUs produced in New Zealand and Australia (as well as the many brands imported from Europe and the UK), DB recommends that the energy labelling mandate align with this EU position.

HEINEKEN is the world's most global brewer, with operations in more countries than any other brewer. As such, HEINEKEN's position is a good indication of international labelling trends.

DB also provides a nutritional table for all our products on our website and, as part of HEINEKEN's commitment to transparency, we will provide further resources to consumers to learn more about the impact of alcohol on their health. This will be completed by 1 January 2024.

We will provide this information through a QR code on all consumer facing packaging on all alcoholic beverages, non-alcoholic beers and ciders and non-alcoholic line extensions of alcoholic brands.

The QR code will be accompanied by specific wording that indicates the QR code leads consumers to information about alcohol and health.

To enhance consumer awareness and understanding, DB supports the proposal to develop a targeted, government-led education and communication campaign as an important strategy to support energy labelling on alcoholic beverages.

Timing

DB has already introduced NIP information on more than 95% of products and will reach 100% in mid-2023 so our portfolio will comply with the proposed introduction of mandatory energy labelling.

Retaining the ability to voluntarily display a NIP will significantly reduce cost as DB will be compliant with the changes and will not need to update packaging.

We request that Food Standards Australia New Zealand considers aligning any changes to labelling with other proposals currently under consideration.