



SUBMISSION TO FOOD STANDARDS AUSTRALIA AND NEW ZEALAND ON PROPOSAL P1059: ENERGY LABELLING ON ALCOHOLIC BEVERAGES

About this submission

The George Institute for Global Health is pleased to contribute a written submission to Food Standards Australia and New Zealand (FSANZ) on Proposal P1059: Energy Labelling on Alcohol Beverages.

As highlighted in FSANZ's documentation on Proposal P1059, overweight and obesity remain a significant factor in ill health and early morbidity in Australia and New Zealand. Diet-related disease and overweight and obesity are two of the top three leading contributors to burden of disease in Australia (1), cause one-fifth of all deaths (1) and lead to billions of dollars in direct (e.g. health care) and indirect (e.g. lost productivity) costs (2-5).

Alcohol consumption accounts for nearly 5% of our total disease burden (6) and causes 6,000 deaths per year (7). While there are favourable downward trends, Australians remain heavy drinkers by world standards, consuming 9.5 litres of pure alcohol each per year (8). It is therefore essential that initiatives to reduce the contribution of alcohol to overweight and obesity in Australia do not inadvertently make alcohol appear to be just another type of beverage. The substantial contribution of alcohol to the burden of disease makes it 'no ordinary commodity' (9).

The ways that foods and beverages are marketed and made available have a significant impact on the overall health and wellbeing of communities. As such, it is imperative that the food regulatory system embark on ambitious policy and mandatory regulations, including improvements to food and beverage labelling, implementing meaningful and mandatory reformulation targets, and eliminating predatory marketing to children, to protect consumers from poor health.

The George Institute joins our public health colleagues and consumers around the country in supporting the implementation of an energy label on alcohol beverages. While there is no safe consumption level for alcohol (10) – a known carcinogen – we support providing consumers with the information they need to make informed dietary decisions that will reduce the burden of chronic disease.

However, The George Institute is concerned that the application of an energy label on alcoholic beverages may also cause a 'health halo' on these products, where consumers can make decisions on energy intake to address overweight and obesity concerns, whilst not being fully aware that even small quantities of alcohol can lead to chronic diseases. The

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George Institute is confident that many of the risks that could lead to a net negative outcome as a result of energy labelling on alcoholic beverages can be addressed by FSANZ through the processes of this consultation and based on evidence provided by public health and consumer colleagues, and in particular by conducting targeted consumer testing.

The George Institute would like to commend the Foundation for Alcohol Research and Education, Cancer Council NSW and Alcohol Change Australia on their leadership on this issue. Where relevant, The George Institute has reiterated recommendations and information featured in their submissions.

We welcome the opportunity to further engage with FSANZ on this important policy area.

About The George Institute for Global Health

The George Institute is a leading independent global medical research institute established and headquartered in Sydney. It has major centres in China, India and the UK, and an international network of experts and collaborators. Our mission is to improve the health of millions of people worldwide by using innovative approaches to prevent and treat the world's biggest killers: non-communicable diseases (NCDs) and injury.

Our work aims to generate effective, evidence-based and affordable solutions to the world's biggest health challenges. We research the chronic and critical conditions that cause the greatest loss of life and quality of life, and the most substantial economic burden, particularly in resource-poor settings.

Our food policy team works in Australia and overseas to reduce death and disease caused by alcohol and diets high in salt, harmful fats, added sugars and excess energy. The team conducts multi-disciplinary research with a focus on generating outputs that will help government and industry deliver a healthier food environment for all. Our alcohol research covers the domains of marketing and supply restrictions, harm-reduction campaigns and industry's efforts to influence policy.

Acknowledgement of Country

The George Institute acknowledges the Gadigal People of the Eora Nation as the Traditional Custodians of the land on which our Australia office is built, and this submission was written.

We pay our respect to Elders past, present and emerging.

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Supported positions

The George Institute for Global Health joins our public health colleagues and consumers around the country in welcoming the implementation of a mandatory energy label on alcohol beverages (11). We make the following recommendations to ensure Proposal P1059 meets its objectives.

1. The George Institute supports mandatory application of information across all categories of alcoholic beverages (12-15).
2. The George Institute supports the presentation of energy information to be provided in a standardised energy information panel.
3. The George Institute supports the requirement for energy content to be provided in kilojoules.
4. The George Institute supports the requirement of energy information to be provided per 100ml.
5. The George Institute supports the requirement for energy information to be provided on all layers of packaging.

Unsupported positions

While The George Institute for Global Health joins our public health and consumer colleagues in welcoming the implementation of a mandatory energy label on alcohol beverages, we are concerned about a number of key aspects of the FSANZ proposal. We make the following recommendations to overcome potential adverse outcomes resulting from Proposal P1059.

1. The George Institute does not support producers being permitted to make any reference to the terms 'serve' or 'serving' on alcohol products. There is no 'safe' intake level of alcohol intake, hence the 'low-risk' wording in Australia's alcohol guidelines. Consumers are accustomed to 'serves' being recommended intake levels, which does not apply in the context of alcohol.
2. The George Institute does not support exclusions for alcohol products made and packaged on premises (e.g., wineries) (16).
3. The George Institute does not support exclusions for alcoholic products delivered packaged and ready for consumption (17-19).
4. The George Institute does not support the inclusion of percentage of daily intake or a full Nutrition Information Panel (NIP). These options have the potential to communicate a 'health halo' to consumers, which is not appropriate in the alcohol context.
5. The George Institute does not support energy-related claims being permitted on the labels of alcoholic beverages, including those referring to sugar and carbohydrates.
6. The George Institute does not support the addition of standard drinks on the energy table. This information must be standalone to enhance salience.
7. The George Institute does not support the ability of manufacturers to report calories on front of packaging and kilojoules in the energy information panel.

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Q1. For the declaration of energy content information only, is the heading Nutrition and/or Energy Information appropriate for alcoholic beverages?

The George Institute supports the use of 'Energy Information Panel'. It is not appropriate to use the term 'nutrition' because alcohol does not provide dietary nutrition.

Q2. Are the additional lines in the header (i.e. servings per package, serving size) necessary when declaring energy content information only?

The George Institute does not support use of the terms 'serve' and 'serving' appearing anywhere on the package. These can be interpreted as endorsing alcohol consumption when there is no safe intake level.

There is evidence from the food domain that consumers find serving sizes difficult to understand and apply (20). Instead, "Studies suggest that the addition of a second column presenting nutrient and calorie information for an entire package, rather than per serving, might be more helpful for the consumer" (20). Energy per container for beverages consumed in a single sitting is likely to be a useful addition, however The George Institute recommends consumer testing is conducted to ensure consumers interpret this information correctly.

Q3. Do you support the proposed quantities to be declared i.e. per 100 ML and per serving (as determined by the manufacturer)?

The George Institute supports the declaration of energy per 100 ml.

The George Institute does not support the term 'serving' being used anywhere on alcohol packages due to the potential for this to generate a health halo for alcohol products.

The George Institute does not support the ability for manufacturers to specify serving sizes. This has been an acknowledged failure in the food domain (20-21), and in the alcohol domain there is the added complication of consumers becoming confused about the difference between a standard drink and a serving.

Q4. Are the proposed quantities to be declared suitable for all categories of alcoholic beverages e.g. wine, spirits etc?

The George Institute supports the proposed quantities to be declared suitable for all categories of alcoholic beverages.

Q5. Should energy content information on spirits be declared on a per serve (e.g. 30 mL) basis only?

The George Institute does not support energy content information on spirits be declared as per serve. The 100 ml information is required to enable consumers to compare across products. The terms 'serve' and 'serving' should appear nowhere on alcohol products as this may encourage consumption of alcoholic beverages.

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Q6. Can you offer any information or views about the costs and benefits that should be considered?

The use of paper labels is on the wane, with many alcohol producers now using digital labelling. This can be verified by a quick walk around a local alcohol store. The costs of making changes to alcohol labels have therefore decreased substantially.

In terms of benefits, consumers have a fundamental right to information about the foods and beverages they consume. This right exists at the intersection of the United Nations' human rights of health (Article 25) and education (Article 26). These rights are immeasurable and invaluable.

Contact

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