

Submission to Food Standards Australia New Zealand on Proposal P1059 – Energy Labelling on Alcohol Products

Alcohol Healthwatch is a charity based in Tamaki Mākarau, Auckland, Aotearoa, New Zealand. We take an evidence-based public health approach to reduce alcohol-related harm. Our core services are funded by Te Whatu Ora/Health New Zealand.

Alcohol Healthwatch welcomes the opportunity to submit to FSANZ regarding Proposal P1059 - Energy labelling on alcoholic beverages. In preparing this submission, we have considered the labelling proposal and given regard to the unique harms related to alcohol in Aotearoa and the role alcohol plays in weight gain and obesity through daily energy intake.

2) Support for mandatory labelling

The Alcohol manufacturing industry is currently able to provide energy information as a voluntary measure but has failed to do so. Compulsory labelling will ensure that consumers have access to the information they need to make informed nutritional decisions in regard to alcohol consumption.

Alcohol Healthwatch supports the following proposals.

- the requirement that the energy content is provided in kilojoules on alcohol products.
- that the energy content information on alcoholic beverages be set out per 100mls of the beverage.

4) Alcohol Healthwatch recommendations:

We recommend that FSANZ undertake consumer testing on the energy information panel to understand how consumers will interpret the information that will be available to them.

It is vital that this consumer testing includes how people interpret 'energy' when related to alcohol use and if it may be a driver for adverse impacts. Research shows that consumers were unaware that alcohol is the main source of energy in alcoholic beverages, but tend to focus on sugar (3). Consumer testing will go some way to ensure that energy labelling will work best for consumers. Consumers also shared that their decision regarding which alcoholic products they buy or consume may be influenced by energy labelling, especially if they were restricting energy consumption, or choosing between similar products (3). This research further highlights the need for consumer testing to avoid potential adverse impacts.

We do not recommend that information is included as per serve. This may imply that the serving size is recommended as adopted by the alcohol manufacturer. We believe this could increase the risk to the consumer, and further shows why consumer testing is necessary.

5) Tabular format consistent with Nutrition Information Panel

Alcohol Healthwatch supports the Nutritional Information Panel (NIP) following a standard layout in which the energy content is in kilojoules. We feel that it is vital that consumers understand what they're seeing, and having a standard layout will support this.

We also recognise that visibility is important, and therefore recommend that the table includes a clear heading.

We believe there needs to be more consumer testing regarding whether 'nutritional information' or 'energy information' is more appropriate. Consumer testing would ensure that there are no unexpected adverse impacts from the labelling, which is unique to alcohol and important given the harms from alcohol communities experience.

6) Measurements provided per 100ml and per serving

Alcohol Healthwatch supports the energy information for all alcohol products being provided per 100ml which will ensure familiarity to consumers. It will also ensure that consumers are able to compare alcoholic and non-alcoholic beverages easily, which may highlight that alcohol can be a high energy product.

We **do not support** the NIP having "per serving" on it. We share public health concern that this may give a false perception that there is a healthy or safe serving size of alcohol. Given the harms alcohol causes to communities, we feel that this would be a false perception that may cause harm to consumers.

We also highlight the concerns noted by FSANZ that the use of per serve may imply that is the same as, or excess of a standard drink and therefore unintentionally lead

to higher levels of alcohol consumption, bringing harm not only to the consumer, but those around them too.

It is vital that this energy labelling for alcoholic beverages and products works in support of, rather than, undermining the work of public health experts and their objectives to reduce alcohol harm. Consumer testing regarding “per serving” will ensure there are no negative health outcomes in regard to alcohol consumption.

7) Application of energy labelling

Alcohol Healthwatch does *not support* FSANZ in the proposal of:

- include existing exemptions from the requirement to bear a label for retail sales be applied to alcoholic products.

- the labelling only be required on one layer of packaging, we believe the energy labelling must be included on all layers of packaging.

8) Labelling exclusions

We recommend that the mandatory labelling remains consistent across all alcoholic products. We recommend there are no exclusions to this, products made and packaged on the same premises where they're sold (e.g, wineries, distilleries and breweries) should not be excluded from labelling, and nor should alcoholic products that are delivered as ready to consume (e.g, products bought by consumers and delivered by a liquor retailer)

We recognise that the growth of online sales and delivery of alcoholic products has seen rapid growth over the last 5 years, and continues to grow steadily, therefore it is incredibly important that the energy labelling includes all alcoholic products that can be ordered and delivered online.

Australian research shows that over one-third of Australians who consume alcohol have ordered alcohol online for home delivery (4). This further highlights how important it is for energy labelling to be included on all alcoholic products to ensure that the consumer is as fully informed as possible, and it should not matter where or how those alcoholic products are purchased.

9) Nutrition content claims about energy.

Alcohol Healthwatch suggests that FSANZ implement P1049 which will see the removal of exemptions that allows alcohol manufacturers to make claims regarding sugar and carbohydrates. There is concern that these claims may be misinterpreted by consumers, who may feel that these claims are suggesting that alcoholic products could contribute to more positive health outcomes.

This is problematic as the harms from alcohol are widespread and fall inequitably on some groups in our society and communities, including children and young people, indigenous populations and lower income groups.

Emergent research shows that a ‘health halo effect’ drives alcohol sales. The research shows that over 75% of Australian drinkers have selected low carbohydrate

or low sugar products thinking they were making a healthier, informed decision (5). Research also shows that consumers desire more information on alcoholic beverages when compared with what is normally on products. (3) Alcohol directly causes cancer (6), and other life-shortening diseases. Alcohol Healthwatch believes that consumers should be fully informed about the harms and risks of consuming alcohol, in the same way, consumers who smoke cigarettes are. We look forward to working with FSANZ to ensure consumers are fully informed by labelling on alcoholic products.

[REDACTED]

References:

1. Rehm J, Gmel GE, Gmel G, Hasan OSM, Imtiaz S, Popova S, et al. The relationship between different dimensions of alcohol use and the burden of disease—an update. *Addiction*. 2017 Jun;112(6):968–1001.
2. Connor JL, Kydd R, Shield K, Rehm J. Alcohol-attributable burden of disease and injury in New Zealand: 2004 and 2007 : research report commissioned by the Health Promotion Agency. Wellington, New Zealand: Health Promotion Agency; 2013.
3. Walker N, McCormack J, Verbiest M, Jiang Y, Lang B, Ni Mhurchu C. Energy labelling for alcoholic beverages in New Zealand: consumer perceptions. Phase 1 report, Focus groups. Wellington, New Zealand: Health Promotion Agency; 2019.
4. Foundation for Alcohol Research and Education. Attitudes and Behaviours 2020 Annual Alcohol Poll [Internet]. 2020 Aug p. 42. Available from: <https://fare.org.au/wp-content/uploads/ALCPOLL-2020.pdf>
5. Haynes A, Chen YJM, Dixon H, Ng Krattli S, Gu L, Wakefield M. Health-Oriented Marketing on Alcoholic Drinks: An Online Audit and Comparison of Nutrition Content of Australian Products. *J Stud Alcohol Drugs*. 2022 Sep;83(5):750–9.
6. Runggay H, Murphy N, Ferrari P, Soerjomataram I. Alcohol and Cancer: Epidemiology and Biological Mechanisms. *Nutrients*. 2021 Sep 11;13(9):3173.