

## **AMA submission to Food Standards Australian and New Zealand consultation on P1059 – Energy Labelling on Alcoholic Beverages**

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### **Summary**

The Australian Medical Association (AMA) is pleased to make a submission to this consultation regarding the proposed changes to energy labelling on alcoholic beverages. As outlined in the Food Standards Australian and New Zealand (FSANZ) consultation paper, current public health efforts are not helping to curb the prevalence of obesity in Australia. Energy intake is a major contributing factor to maintaining good health and reducing the risk of chronic disease related to unhealthy body weight. Australians drink a large volume of alcohol overall, and many drink at harmful levels, including teenagers and young adults. A range of factors can contribute to harmful alcohol use, including the marketing and glamorisation of alcohol, the social acceptability of hazardous use, the ready availability of alcohol and its affordability, this is where preventative measures such as appropriate labelling can help the consumer to make better health choices.

The AMA supports the proposed addition of energy labelling on alcoholic beverages, to further inform consumers on the energy content contained in these beverages. This is an important step in regulating and standardising how consumers are informed on energy contents across the food and beverage industry. The AMA is committed to Australia achieving the greatest possible reduction in the harmful effects of excess alcohol consumption. The AMA believes these harms are best reduced through targeted prevention, which includes appropriate labelling of alcoholic beverages, and educating the community on how best to understand and make choices around their consumption of alcoholic beverages.

### **The Health Impacts of Energy Consumption in Alcoholic Beverages**

Alcohol consumption can have negative impacts on mental and physical health, as well as social and economic impacts. It is important to acknowledge that there is never a 'safe' level of alcohol consumption, without risk of health harms. Combatting the risks of alcohol consumption must be a whole of society approach, and it is encouraging to see FSANZ looking to address some of the harms surrounding the energy content of alcohol. In the AMA's [position statement](#) on Alcohol Consumption and Alcohol-Related Harms (2012), we state that the harms of excess alcohol use are significant and warrant serious measures, especially regarding adolescents and

youth. The AMA believes these harms are best reduced through targeted prevention and early intervention, and fully resourced best-practice treatment.

As FSANZ's consultation paper acknowledges, alcohol is high in energy, with alcoholic beverages containing alcohol, sugars and carbohydrates that add to the energy content of the beverage. An individual's energy intake is one factor that can lead to obesity, with certain energy dense products containing no additional nutritional benefit, instead only adding to the chronic disease crisis, that can be linked with obesity in Australia.

The AMA welcomes the inclusion of brewed soft drinks with  $\geq 0.5\%$  alcohol, into the scope of this energy labelling. The AMA has modelled the health benefits and cost savings that can be achieved through preventative health measures, such as the AMA's [Sickly Sweet](#) campaign, calling for a tax on sugar sweetened beverages.

### **The Value of Energy Labelling on Alcoholic Beverages from a Health Perspective**

It is concerning to the AMA that consumers do not understand that alcohol is the main energy component of an alcoholic beverage, as suggested in the [FSANZ 2021](#) consumer findings. However, it is encouraging that the same consumers say they would value having the energy content of alcoholic beverages displayed on the labels. The suggested nutrition information panel (NIP) template for the labels is in-line with other energy labels found in Australia and New Zealand, and this continuity of design is important to the public's understanding and usage.

If these labelling changes become mandatory, it will allow for the alcohol industry to be regulated in line with the rest of the food and beverage industry, regarding the energy content of their products. This allows consumers more clarity and consistency around their purchasing and health choices. The suggested labelling will help to improve health literacy relating to alcohol.

### **Educating and Regulating Energy Labelling on Alcoholic Beverages**

The AMA supports measures to enhance consumer understanding that drives informed and healthy choices. As these energy labelling changes are introduced, FSANZ must make concentrated efforts to ensure the public is aware of the changes and are educated on how to interpret the information presented to them.

The AMA encourages FSANZ to develop a public education campaign to support the labelling changes to raise awareness. The AMA reported in [2012](#) that young people are highly susceptible to marketing and alcohol consumption, this is a trend that continues to be evident across digital platforms as content development has evolved over the last 10 years.

Appropriate regulation through FSANZ must also be maintained, to ensure that alcoholic beverage producers are adhering to the standards of labels needed, found under the proposed energy labelling regulations in proposal P1059. This must also be appropriately regulated in line with nutrition content claims as per section 5.6.3 of the consultation paper. This will ensure that nutritional claims meet compositional limit standards and are not confusing for consumers.

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