

20 March 2023

## Call for submissions

### Proposal PI059 - Energy labelling on alcoholic beverages

Public Health Services, Department of Health, Tasmania (PHS) appreciates the opportunity to comment on Proposal PI059 – Energy labelling on alcoholic beverages.

FSANZ considered three options:

1. Maintain the status quo
2. Permit energy content information to be provided voluntarily in a prescribed format
3. Require energy content information to be provided in a prescribed format

FSANZ considered Option 3 had the largest net benefit and is the preferred option.

PHS supports in principle a mandatory approach to energy labelling on alcoholic beverages to ensure greater coverage and consistency in provision of information enabling consumers to make an informed choice. This is in line with the Ministerial Policy Guideline on *Food Labelling to Support Consumers to Make Informed Healthy Choices* that states Ministers expect 'food labels to provide adequate information to enable consumers to make informed food choices to support healthy dietary patterns recommended in the Dietary Guidelines'. It is also consistent with the 2011 Labelling Logic: Review of Food Labelling Law and Policy that recommended energy labelling be displayed on all alcoholic beverages and is supported by Food Ministers.

FSANZ is proposing to amend the Code to require:

- energy content information to be provided for standardised alcoholic beverages and beverages containing no less than 0.5% ABV that are not standardised alcoholic beverages
- tabular format with borders
- heading: ENERGY INFORMATION
- the number of servings of the beverage in the package
- the average quantity of the beverage in a serving, in mL
- average energy content, to be expressed:
  - in kilojoules or both kilojoule and in kilocalories
  - to no more than 3 significant figures
  - as the quantity per serving and quantity per 100mL
- percentage daily intake would be permitted
- not proposing to require mandatory labelling on beverages containing alcohol in small packages

- the energy content information for beverages containing alcohol for retail sale would only be required on one layer of packaging.
- Retain voluntary provision of a NIP in the label
- No changes to nutrition content claims about energy

PHS supports the use of the wording **ENERGY LABELLING** and that energy content be provided on alcoholic beverages and beverages containing no less than 0.5% ABV.

PHS remains concerned about the inclusion of servings per package and serving size and how this aligns (or doesn't) with standard drink sizes. The proposed approach for serving size to be determined by the manufacturer may further add to consumer confusion if manufacturers choose varying serve sizes for similar beverages.

PHS considers there is insufficient evidence on consumers understanding of the relationship between servings and standard drinks to determine whether to support kilojoule labelling per 100mL, per serving, or per standard drink. To ensure that labelling changes do not undermine messages to reduce risky alcohol consumption PHS recommends that FSANZ consult with the NHMRC Alcohol Guidelines Project Team. This will enable further exploration of the impact of specific labelling policies on purchase and consumption of alcoholic beverages and ensure both dietary and alcohol guidelines are working synergistically.