

4 September 2023

Food Standards Australia New Zealand
PO Box 5423
KINGSTON
ACT 2604
AUSTRALIA

By email: submissions@foodstandards.gov.au

Dear Sir/Madam

Call for submissions - Proposal 1049 – Asahi Beverages

On behalf of Asahi Beverages, one of Oceania's leading beverage companies, we thank you for the opportunity to provide comments in response to the *Call for Submissions – Proposal 1049 – Carbohydrate and sugar claims on alcoholic beverages*.

Asahi Beverages proudly employs 4,500 Australians and New Zealanders, across our alcohol and non-alcohol businesses, including Carlton & United Breweries. We have 17 production facilities across Australia and one in New Zealand.

We have contributed to Food Standards Australia and New Zealand's (FSANZ) work on a number of recent Proposals and look forward to continuing to work constructively with FSANZ as it develops its P1049 and other Proposals.

As a member of the Brewers Association of Australia, and Spirits Council of New Zealand, Asahi Beverages supports the Brewers Association and Spirits Council NZ submissions.

In supporting the submissions, we want to emphasise our business' desire to ensure our drinkers have access on our product packaging to important information that they need to make informed decisions about the products they consume.

Support for FSANZ draft variation

Across our Australian and New Zealand business we have dozens of SKUs that make a sugar or carbohydrate claim. Most of those claims are made on our Ready to Drink (RTD) and cider products with only 13 carbohydrate claims made on our beers.

We believe FSANZ's draft variation, supporting Option 2, strikes the right balance by allowing producers to make accurate statements concerning the level of sugar and carbohydrates in their products, that provide useful and transparent information to consumers.

Our drinkers tell us they want the option of no or low sugar and carbohydrate products and want to see this type of accurate and transparent information displayed on the label. We continue to reject the assertions that alcoholic products which make accurate statements about sugar and carbohydrate content are confusing drinkers. Quite the opposite, we are

aware that drinkers are sophisticated in their buying decisions and that no and low sugar and carbohydrate products allow them to drink a product that fits in with their dietary preferences.

The prevalence of no or low sugar and carbohydrate claims on our products continues to increase because consumers are demanding products, which have no or low sugar and carbohydrates. Preventing consumers having clear information on packaging about products that have no or low sugar or carbohydrates would run counter to consumer demands for more information and transparency about the products they consume.

Alcohol consumption trends

We also believe that Australians seeking more options in respect of limiting their intake of sugar and carbohydrates through beverages is consistent with the broader trends of alcohol consumption.

Australians have heeded the moderation message, with alcohol consumption having reduced by more than 25% per capita since the 1970s.

More Australians have embraced the moderation message. They are also seeking to limit their sugar and carbohydrate consumption. The information we, and other producers, provide to those consumers is pivotal in their ability to assess what works for them.

Ultimately, if a consumer wishes to drink, for example, a beer, then it's entirely appropriate that the consumer is able to access information that accurately distinguishes a lower carbohydrate beer from a regular beer. We submit FSANZ's draft variation Option 2 achieves this.

Again, we thank you for the opportunity to contribute to FSANZ's Call for submissions. Should you wish to discuss our contribution in further detail, please don't hesitate to contact me on [REDACTED]

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