

21 March 2023

RE: FSANZ Proposal P1059 – Energy Labelling on Alcoholic Beverages

The Victorian Health Promotion Foundation (VicHealth) welcomes proposal P1059 by Food Standards Australia and New Zealand (FSANZ) regarding energy labelling on alcoholic beverages. As stated in the proposal, the contribution alcohol makes to energy intake and therefore its contribution to the levels of overweight and obesity in Australia is alarming. This proposal provides a strong opportunity to address this situation.

VicHealth is an independent government authority established under the Victorian *Tobacco Act 1987* with a mandate to promote good health for all Victorians and provide evidence-based policy advice. We are a pioneer in health promotion, working with partners to discover, implement and share solutions to the health problems facing Victorians and Australians. We seek a community where everyone enjoys better health and wellbeing. VicHealth works to keep people healthy, happy and well – preventing chronic disease and reducing the burden of poor health on everyday Australians.

VicHealth therefore has a strong interest in this proposal and its potential to reduce and prevent chronic disease burden. Energy balance is fundamental for maintaining a healthy body weight and reducing the risk of chronic disease related to overweight and obesity. However, alcohol is high in energy content, providing 7kcal/g, making it the second most important source of energy in the diet, surpassed only by fats. One of the most important yet neglected factors related to alcohol consumption is the impact it has on weight gain and obesity, and diet related diseases.

This is particularly pertinent when evidence shows that energy consumption has a direct impact on our community's health. On average, alcoholic beverages contribute approximately 16% of total energy intake for Australian and New Zealand adults on days when alcohol is consumedⁱ. Consumers have little understanding of how alcohol contributes to energy intake and may therefore be inadvertently consuming more than anticipated. This then is a leading contributor to high energy intake which is directly contributing to the crisis of 2 in 3 Australian adults who are overweight or obeseⁱⁱ. If we are to reach the targets set out in the National Obesity Strategy to halt the rise and reverse the trend in the prevalence of obesity by 2030, we need to take strong policy action. The Strategy further recommends that the food regulation system should consider policies or regulations to support people to make healthier food and drink choices such as information on unhealthy ingredients.

The Australian Guidelines to reduce health risks associated with alcohol reports that to reduce risks of harm from alcohol, Australian adults should consume no more than 10 standard drinks a week and no more than 4 standard drinks on any given day. Awareness of consumption recommendations and health impacts are low with 20% of Australians drinking in excess of the guidelinesⁱⁱⁱ. Evidence indicates consumers generally have a poor understanding of the energy content of alcoholic beverages and do not understand

alcohol is the main source of energy in most alcoholic beverages. Despite this, Australians are increasingly becoming concerned with the risks associated with alcohol use. More than 4 in 5 Australians believe they have a right to know about the long-term health impacts associated with regular alcohol use^{iv} and 76% of Australians support health warnings on alcohol products^v.

Additionally, the prevalence of alcohol related harm in Australia is widespread. Nearly 6,000 lives are lost each year due to alcohol and more than 144,000 people are hospitalised^{vi}. With alcohol use contributing to 4.5% of the total burden of disease in Australia in 2018^{vii}, alcohol use remains one of our greatest health challenges. The energy labelling process has strong potential to reduce the consumption of alcohol which would not only flow on to people having healthier diets but reduce the risk of other alcohol related harm.

The goal of energy labelling on alcohol products should be to inform consumers and support them to reduce alcohol use and, consequently, energy intake from alcohol. It is of fundamental importance that the design and application of alcohol energy labelling does not in any way promote increased use, undermine consumer understanding and use of standard drinks or present alcohol as a safe or 'healthier' choice or as a part of a healthy diet. Reduced alcohol use should be the primary aim both from an obesity prevention perspective, and from the perspective of reducing broader alcohol harm. To achieve this, we recommend FSANZ undertakes consumer testing on proposed and alternate labels.

Accepting FSANZ proposal P1059 energy labelling on alcoholic products will assist consumers to understand the health impacts from alcohol and its associated increased energy intake by displaying the energy content in the nutrition information panel (NIP). Energy consumption related to alcoholic products is not widely understood nor the contribution it makes to our diets. **This is why VicHealth strongly supports mandatory standardised on-label energy information for alcoholic products and therefore supports much of the proposal FSANZ has put forward regarding energy labelling on alcoholic beverages.**

On this occasion, **VicHealth would also like to endorse the submission put forward by the Obesity Policy Coalition (OPC) on proposal P1059.**

In particular, VicHealth strongly agrees with the following put forward by OPC:

- the requirement that the energy content on alcoholic products be provided in kilojoules,
- the requirement that energy content information be provided on alcoholic beverages per **100ml of the beverage and per container**,
- that there should be no labelling exclusion for alcoholic products made and packaged on the premise from which it is sold (e.g., in wineries and breweries) and for alcoholic products that are delivered packaged and ready for consumption,
- energy labelling should be required on both individual packaging and outer layer packaging,

- to apply the information consistently to all categories of alcoholic products.

The FSANZ proposal P1059 to amend the Australia New Zealand Food Standards Code (the Code) to provide energy (kilojoule) content information on beverages containing alcohol is long overdue. Its implementation has enormous potential to create a positive change for consumers by enabling them to make healthy choices about the products they consume. FSANZ must take this opportunity to deliver a strong robust label which is why an approach for per 100ml and per container is the recommended approach.

We strongly oppose FSANZ's proposal to allow alcohol companies to determine their own serving size and to display this as a 'per serve' column in addition to the per 100ml content. Allowing companies that produce and/or sell a harmful product to determine a 'normal' serving is problematic and is unlikely to result in the best outcome for public health. Instead, alcohol companies are most likely to choose the option that best serves their interests of increasing profit.

While we strongly oppose the alcohol industry determining a serving size for alcohol products, we do not support the inclusion of per serve labelling for alcohol even if it was determined by FSANZ. This is because the display of a serving amount on alcohol implies that the amount listed is a normal, safe or recommended amount for consumption, and this is problematic when applied to alcohol, a harmful product, that is a known carcinogen.

For some time now, many policies, strategies and guidelines have recognised the contribution alcohol makes to energy content and the lack of transparency on alcohol products. The importance of The Australian Dietary Guidelines, The Eating and Activity Guidelines for New Zealand Adults, The National Alcohol Strategy, The National Preventative Health Strategy and The National Obesity Strategy all stating their support for energy (kilojoule) labelling as outlined in FSANZ proposal P1059 should not be dismissed.

In 2011, the Food Ministers meeting supported the inclusion of energy content on the labels of all alcoholic beverages and it is imperative that there is no further delay to implementing this change. Ultimately VicHealth strongly supports the proposal for on-label energy information for alcoholic products and recommends its speedy implementation.

Should you wish to discuss this submission further, [REDACTED]
[REDACTED]

Kind regards

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ⁱ <https://www.foodstandards.gov.au/consumer/labelling/Pages/Energy-labelling-of-alcoholic-beverages.aspx>

ⁱⁱ <https://www.health.gov.au/resources/publications/national-obesity-strategy-2022-2032?language=en#:~:text=The%20National%20Obesity%20Strategy%20is,to%20live%20their%20healthiest%20lives.>

ⁱⁱⁱ Bowden, J.A., Delfabbro, P., Room, R. et al. 2014. Alcohol consumption and NHMRC guidelines: has the message got out, are people conforming and are they aware that alcohol causes cancer? Australian & New Zealand Journal of Public Health 38(1) 66- 72.

^{iv} <https://fare.org.au/annual-alcohol-poll-2019-attitudes-and-behaviours/>

^v <https://fare.org.au/annual-alcohol-poll-2019-attitudes-and-behaviours/>

^{vi} Lensvelt E, Gilmore W, Liang W, Sherk A, T. C. Estimated alcohol-attributable deaths and hospitalisations in Australia 2004 to 2015. Perth: National Drug Research Institute, Curtin University, 2018.

^{vii} <https://www.aihw.gov.au/reports/burden-of-disease/abds-2018-interactive-data-risk-factors/contents/alcohol-use>