

TO

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FSANZ

RE: P1059 - ENERGY LABELLING ON ALCOHOLIC BEVERAGES

We take pleasure in forwarding Comments from the FTAA Technical Committee in response to Proposal P1059.

1. It is considered that ALL food products should be treated equally, in that all products should be labelled with a Nutrition Information panel and an Ingredient list; albeit there will be exceptions in special cases. However, alcoholic beverages are NOT a special case, as per this Proposal which discusses the relationship of energy intake and obesity.
2. The relationship of the Energy content should be related to the source of the energy. In alcoholic beverages, energy is derived primarily, but not only, from the alcohol content. Many alcoholic beverages have sugar levels (i.e. some beers, wines, etc.) and in specific products (i.e. cream-based liqueurs, Advocaat, etc.) there are fat levels that contribute to the overall energy level.
3. It is strongly suggested that if Alcoholic beverages are to be labelled with Energy levels, then the Energy levels must include in the calculation the presence of all sugars/carbohydrates and fats.
4. Furthermore, the actual levels of fats (37kJ/g), sugars / carbohydrates (17kJ/g) and alcohol (29kJ/g), per serve and per 100mL should be shown in the same panel, so as to relate to the actual sources of the energy. It is appreciated that Protein and Sodium are usually at very low levels in alcoholic beverages and would not contribute significantly to obesity or other health related issues.
5. The Submission calls for comments on costs . We do not believe the use of break even analysis is appropriate in this case. Any costs would be for alcoholic beverage manufacturers and any benefits would be reduction in costs of health treatment for overweight and obesity and may also lead to the reduction of the purchase of Alcoholic beverages (as is happening at present with Zero Alcoholic beer and wine – again affecting the manufacturer with lower sales).

