



Spirits New Zealand

Submission – P1062

Defining Added Sugars for Claims

October 2023

Introduction

Spirits New Zealand is the national trade organisation representing New Zealand's leading producers, distributors, brand owners, importers and exporters of premium spirits and spirit-based drinks. Our members are Asahi, Bacardi, Beam Suntory, Brown-Forman, Diageo, Federal Merchants, Hancocks, Lion, Moet-Hennessy and Pernod Ricard.

Spirits NZ represents over 96% of spirit industry interests in New Zealand.

We thank you for the opportunity to submit on Proposal P1062. We note with interest the comments made under Section 2.2 – *Related Applications and Proposals* and ask, as we have for other labelling-related submissions, that continued consideration is given to the impact of parallel labelling reviews from an implementation/timing perspective to minimise unnecessary cost to industry and to smaller producers in particular.

We acknowledge that FSANZ has done this in the past.

Our submission follows below.

Thank you.



Submission

1. We support in principle FSANZ's approach to clarify the definition of "sugars" for the purposes of simplifying or strengthening on-label information for consumers with regards to different types of claims. In reviewing the proposal document we have one concern which we discuss here.
2. Our concern is not new as we raised it, along with other industry stakeholders, during the targeted consultation for P1058. It relates, not to the need to define "added sugar" from a technical perspective, but rather to how production processes in the beverage alcohol industry change or eliminate sugars that may be present initially but are certainly not at the time of bottling.
3. We believe there needs to be specific clarification of how (fermented) alcoholic beverages will be treated in this regard. This is, obviously, more immediately relevant to beer and wine but could be relevant to grain and grape-based full strength spirits which, prior to distillation, can start as "beer" or "wine".
4. We do not believe it is FSANZ's intention to capture the likes of cognac, brandy, bourbon and whisky as having "added sugars" when, after fermentation and distillation there are none. But if the definition is meant to purely capture sugars as listed with no regard to what happens to them during fermentation and distillation then we raise this as a concern.
5. FSANZ's consideration of this matter would be appreciated.

Ends