

4 September 2023

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604



Submitted via: submissions@foodstandards.gov.au

Dear Sir/Madam

Re: Proposal P1049 – Carbohydrate and sugar claims on alcoholic beverages

Thank you for the opportunity to comment on Proposal P1049.

Cider Australia's primary interest in this matter relates to 'no added sugar' claims, which are sometimes used by producers to differentiate ciders made with 100% juice and ciders containing sucrose.

Cider Australia **supports** the draft variation **subject to** the definition of sugar and sugars relevant for 'no added sugars' claims being that outlined on page 7 of the consultation paper (as currently defined in Schedule 4 of the Australia New Zealand Food Standards Code).

I note however that FSANZ has separately raised a new process P1062 – Defining added sugars for claims' which would appear to impact the reforms in P1049. Cider Australia could not support a definition of 'added sugars' that includes single strength fruit and vegetable juice as has been put forward by FSANZ in relation to P1058 – Nutrition labelling about added sugars. While Cider Australia support reforms to improve the information provided to consumers including ingredient labelling, tighter health claim rules and nutrition labelling about sugar content, the definition of 'added sugar' must be meaningful for the product in question.

Please [REDACTED]
[REDACTED]

Yours sincerely

[REDACTED]

[REDACTED] || [REDACTED] || [REDACTED]
[REDACTED] || [REDACTED] || [REDACTED] || [REDACTED]