

TO

Submissions@foodstandards.gov.au
FSANZ

RE: P1049 - ENERGY LABELLING ON ALCOHOLIC BEVERAGES

We take pleasure in forwarding Comments from the FTAA Technical Committee in response to Proposal P1049.

Q1. Do you have or are you aware of any evidence to suggest that nutrition content claims about carbohydrate and/or sugar on alcoholic beverages affect consumers':
(a) level of consumption of alcoholic beverages?

Market trends would suggest that the average consumer is making a more conscious decision to consult the nutritional claims on food products. It would make sense that this consumer activity would apply to alcoholic beverages if nutrient content claims were on alcoholic beverages. We would presume that the level of consumption of carbohydrate dense alcoholic beverages would decrease.

(b) level of physical activity?

We would presume there would not be a relation between level of carbohydrates in alcoholic beverages and level of physical activity.

(c) general food intake?

We do not believe there would be a direct causation between awareness of carbohydrates on alcoholic beverages and general food intake. Perhaps consumers would reduce the carbohydrate content in their food intake. However, there is a prevalent culture of heavy consuming of alcoholic drinks and eating greasy, carbohydrate dense foods.

2. Are you aware of any studies that sufficiently examine the effects of nutrition content claims about carbohydrate and/or sugar on choice between different types of alcoholic beverages?

No

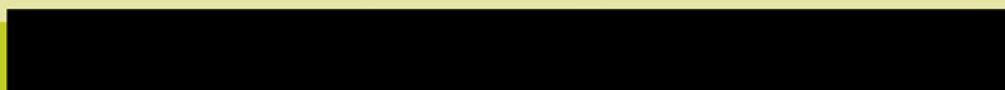
3. Do you agree with the estimates for the average cost of labelling change for option 3 for affected Stock Keeping Units (SKUs) in Attachment D? Please provide evidence to support your position.

N/A

4. Do you have any data on amounts or proportions of SKUs that carry nutrition content claims about carbohydrate and/or sugar and that would be affected by option 3?

No

5. Do you agree with FSANZ's current overall consideration of costs and benefits?





As confirmed previously We do not believe that cost of benefits are appropriate where health is concerned.

6. Are there any other material costs and benefits that you believe should be taken into account in this analysis?

No

Best Regards

