



Australian Government

Wine Australia

Wine Australia for Australian Wine

4 September 2023

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
AUSTRALIA

By email: submissions@foodstandards.gov.au

Dear Sir / Madam,

Submission to Food Standards Australia New Zealand (FSANZ) re Proposal P1049: Carbohydrate and sugar claims on alcoholic beverages

Wine Australia welcomes the opportunity to make a submission in relation to the proposed amendments to the *Australia New Zealand Food Standards Code* (**Code**) articulated in the call for submissions document released by FSANZ for Proposal P1049 dated 24 July 2023 (**FSANZ Proposal**).

About Wine Australia

Wine Australia is a Corporate Commonwealth entity that operates in accordance with the *Wine Australia Act 2013* (**Act**). Wine Australia is not an advocacy body. Accordingly, this submission is intended to highlight the considerations that ought to be taken into account in further developing the FSANZ Proposal, rather than proffering a recommended outcome.

In accordance with section 3 of the Act, Wine Australia's objects include:

- to support grape or wine research and development activities
- to support the growth of the wine industry, and other industries that make wine
- to support the growth of international wine tourism, and services, products and experiences that complement international wine tourism
- to control the export of grape products from Australia
- to promote the consumption and sale of grape products, both in Australia and overseas, and
- to enable Australia to fulfil its obligations under prescribed wine-trading agreements and other international agreements.

Wine Australia is funded by grape growers and winemakers, through levies and user-pays charges, and the Australian Government, which provides matching funding for research, development and adoption investments.



Comments regarding the FSANZ Proposal

Having considered the FSANZ Proposal, it is understood that FSANZ proposes to amend the Code to:

- clarify the existing permission to make carbohydrate content claims on food that contains more than 1.15% ABV by including an express permission to make nutrition content claims about sugar and sugars
- prohibit nutrition content claims about specifically named/specific types of sugars (e.g. fructose), and
- prohibit nutrition content claims about other components of carbohydrate (e.g. fibre).

Wine Australia further understands that, if the FSANZ Proposal is approved and the Code is varied in the manner proposed, nutrition content claims made in relation to the sugar/sugars content of wine (including, for example, “no added sugar”, etc.) would continue to need to be accompanied by a nutrition information panel in accordance with standard 1.2.8—5(2)(a)(i) of the Code.

Wine Australia is supportive of efforts to clarify the Code and its interpretation via the FSANZ Proposal.

Ancillary comments

Wine Australia encourages FSANZ’s continued consideration of relevant international requirements, given that:

- compliance with differing wine labelling laws in export markets presents significant market access challenges for Australian wine exporters, and
- every labelling change pertaining to wine globally represents a risk that additional trade barriers will ensue, and that additional costs will be incurred.

Wine Australia also encourages FSANZ’s continued dialogue with the grape and wine sector around future amendments of the Code relating to labelling of wine, including regarding proposals related to the FSANZ Proposal:

- P1059 – Energy labelling on alcoholic beverages, and
- P1062 – Defining added sugars for claims.¹

In circumstances where sugar is not a permitted additive for still wine produced in Australia, Wine Australia encourages FSANZ to engage with the grape and wine

¹ As at the date of this submission, Proposal P1062 has not been released for public consultation; however, on the basis of information made publicly available by FSANZ, Wine Australia understands Proposal P1062 will address possible changes to standards 1.1.2, 1.2.7 and Schedule 4 of the Code.



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sector in relation to any changes to the Code that could lead to the absence of added sugar being called out in relation to wine.

We thank you in anticipation of the consideration of this submission and welcome the opportunity to engage in further consultation.

For information about this submission, please contact [REDACTED]

Yours sincerely,

