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Hi FSANZ,

I've read through the proposal P1049 for changes to sugar and carbohydrates claims for alcoholic beverages and would like to bring to your attention a few points in relation to the proposal and Food Standards Code 1.2.8, as well as the recent proposal P1059.

Firstly, it would seem that FSC 1.2.8 has no changes proposed as a result of this review.

Currently FSC 1.2.8 specifies the requirement for a nutrition panel to be included if a claim is made for standardised alcoholic beverages (FSC 1.2.8-5 (2)(a)(i)) or beverages containing no less than 0.5% alcohol by volume (FSC 1.2.8-5 (2)(a)(xv)); effectively prescribed beverages as defined within FSC 2.7.1. As such, if a prescribed beverage according to FSC 2.7.1 has a permitted claim on the packaging then subject to the proposed amendments a full nutrition panel would be required. Bearing in mind the proposed revisions to the code for P1059 (where a truncated nutrition panel showing energy only is proposed for prescribed beverages according to FSC 2.7.1), is FSANZ looking at making adjustments to nutrition panel requirements for prescribed beverages according to FSC 2.7.1 when claims are being made? Is it possible that a truncated nutrition panel declaring Energy and other parameters (e.g. carbohydrates and sugar alone) would be acceptable given that alcoholic beverages typically don't have significant components of fats and proteins?

Further to this, the proposal in P1049 outlines in comments the intention to prohibit claims about fibre for alcoholic beverages. However, there is a clause within FSC 1.2.8 that outlines that in the case of a sugar or carbohydrates claim being made that fibre needs to be declared within the nutrition panel (FSC 1.2.8-6(d)(5)). Is this contradictory and does FSC 1.2.8 need to be updated to remove this requirement for alcoholic beverages?

Thanks – 