

# Submission to Food Standards Australia New Zealand (FSANZ) Proposal P1049 - Carbohydrate and Sugar Claims on Alcoholic Beverages

September 2023



## About FARE

The Foundation for Alcohol Research and Education (FARE) is the leading not-for-profit organisation working towards an Australia free from alcohol harms.

We approach this through developing evidence-informed policy, enabling people-powered advocacy and delivering health promotion programs.

Working with local communities, values-aligned organisations, health professionals and researchers across the country, we strive to improve the health and wellbeing of everyone in Australia.

To learn more about us and our work visit [www.fare.org.au](http://www.fare.org.au).

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# Contents

About FARE .....	2
Executive summary .....	4
Introduction .....	5
Concerns regarding the approach to this proposal .....	5
Recommendation.....	7
References .....	14



# Executive summary

Everyone should have the opportunity to be healthy, safe and free from the harms that alcohol causes to families and communities.

At the moment, alcohol causes harm to far too many Australians.

One Australian dies every 90 minutes and another is hospitalised every three and a half minutes because of alcohol.<sup>1</sup> Alcohol-induced deaths are at the highest reported rate in 10 years<sup>2</sup> and deaths from alcohol-related injuries have more than doubled over the past 10 years.<sup>3</sup> Alcohol hospitalisations have also increased by 27% over the past five years<sup>3</sup> and people accessing treatment for alcohol has increased by 37% over the last 10 years.<sup>4</sup> With alcohol use causally linked to over 200 disease and injury conditions,<sup>5</sup> it is one of our nation's greatest preventive health challenges.

Alcohol companies are currently drawing people's attention away from the risk of harm associated with alcohol use by using marketing claims that make their products appear healthy, including 'low sugar' and 'low carb'. There is strong evidence that nutrition content marketing claims like these can create a 'health halo effect' on unhealthy products.

When it comes to alcoholic products, evidence shows that sugar and carbohydrate claims can lead people to assess alcoholic products as healthier and to contain lower alcohol content, and people report that these claims can influence them to buy and drink more alcoholic products; this occurs without regard to the alcohol content of a product. This is particularly concerning when it comes to alcoholic products, given the risks associated with alcohol use regardless of sugar or carbohydrate content.

It is essential that consumers understand that the alcohol content of products is inherently harmful, regardless of the sugar or carbohydrate content of a product. That is why we must ensure that the risk of harm from alcoholic products is clear to people before they purchase or use alcohol. One way we can do this, is by ensuring honest labelling on alcoholic products – labelling free from misleading marketing claims that suggest an alcoholic product is healthier than they are.

To this end, FARE recommends that FSANZ close the loophole currently being exploited by alcohol companies to make sugar claims in relation to alcoholic products. This can be achieved by amending the Australia New Zealand Food Standards Code to prohibit carbohydrate claims being made in relation to alcoholic products. This brings the added benefit of preventing both forms of misleading claims – carbohydrate and sugar claims. This is in line with the original policy intent to prohibit nutrition content claims being made for alcoholic products and puts people's health and wellbeing first.

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We are concerned that the approach taken to developing this proposal has been limited in intent and scope. We are particularly concerned at the disregard for the wider evidence base on the health halo effect of nutrient content claims. We believe the approach has not been in accordance with the original intent of the Australia and New Zealand Ministerial Forum on Food Regulation (now the Food Ministers' Meeting) in their request of this review, founded in concerns about sugar marketing claims on alcoholic products misleading people by positioning alcohol as a healthier choice when the public health advice is to limit alcohol intake.



# Introduction

FARE welcomes the opportunity to provide a submission to the FSANZ consultation on proposal P1049 regarding carbohydrate and sugar claims on alcoholic beverages.

In our response to this consultation, we consider the proposal in relation to the significant harms caused by alcoholic products, and evidence indicating the potential for sugar and carbohydrate claims to mislead people to consider alcoholic products as healthier. We believe that this aligns with the concern initially raised at the Food Ministers' Meeting that these claims may mislead people to believe they are healthier when public health advice is to limit alcohol use.<sup>6</sup>

**We recommend that FSANZ amend the Australia New Zealand Food Standards Code (the Code) to prohibit carbohydrate claims being made in relation to alcoholic products.** We note that in doing so, this would provide irrefutable clarity in the intent of the Code to prohibit the use of sugar claims for alcoholic products.

Our recommendation is based on evidence showing that nutrition content claims lead to a 'health halo effect'<sup>7,8</sup> on unhealthy products alongside recent and emerging evidence that the use of sugar content and carbohydrate claims on alcoholic products leads people to assess alcoholic products as healthier and to contain lower alcohol content.<sup>9</sup> People also report that these claims would influence them to buy and drink more alcoholic products; this occurs without regard to the alcohol content of a product.<sup>10</sup>

We also raise concerns with the limited scope that was taken in the development of this proposal.

## Concerns regarding the approach to this proposal

### Intent and scope of the proposal

FSANZ states that the intended purpose of the proposed amendments is to provide clarity for industry and government about whether the claims are permitted and to provide "information about sugar content to consumers who choose to consume alcoholic beverages to enable them to make informed choices consistent with dietary guideline recommendations about sugars."<sup>11</sup>

We do not believe that this aligns with the concern or direction provided by the Food Ministers who requested this review by FSANZ. We note that this proposal was initiated at the request of Food Ministers because they were concerned that "[sugar] claims on alcoholic beverages are misleading, and that alcohol is being promoted as a healthier choice for consumers when public health advice is to limit alcohol intake."<sup>12</sup> We believe an effective way to address this issue is for an explicit direction to be made in the Code that sugar claims are expressly prohibited for use in relation to alcoholic products, or the removal of the exception for alcoholic products to make carbohydrate claims. In effect, this would leave no room for misinterpretation of the Code regarding the legality of making sugar claims in relation to alcoholic products.

On the matter of providing clarity for industry and government about whether the claims are permitted by the Code, FSANZ has previously concluded in the 2018 Technical Assessment for carbohydrate claims about food containing alcohol that the policy intent was clear that "claims specifically about the 'sugar' content of foods containing alcohol were not to be permitted by Standard 1.2.7." Despite this, alcohol companies have been left for almost five years to continue to make

prohibited sugar content claims, and the existence of these claims is now being used as part of the justification for their continued use.

On the matter of providing information about sugar content to people considering purchasing alcoholic products to enable them to make informed choices consistent with dietary guideline recommendations about sugar, the primary consideration of this proposal should be harm from alcohol use. When considering national health guidelines, both the Australian Dietary Guidelines and the Australian Guidelines to Reduce Health Risks from Drinking Alcohol strongly recommend limiting alcohol use to reduce risk from alcohol harms – this important aspect is disregarded in the proposed amendments. If FSANZ deem providing sugar and carbohydrate information to be important for supporting consumer and public health objectives, then this information should be incorporated into a mandated nutrition information panel along with energy information. This would provide standardised information that a person can use to objectively compare products, as opposed to marketing claims that predominantly occur on the front-of-pack and are more likely to elicit a ‘health halo effect’. This should also be subject to evidence showing that this information presented in a nutrition information panel does not lead to a ‘health halo effect’ for alcoholic products.

## Costs and benefits analysis

**The cost benefit analysis has not considered harm from alcohol use.**

Harm from alcoholic products costs Australia \$66.8 billion annually.<sup>13</sup> Nearly 6,000 people lose their lives and more than 144,000 people are hospitalised from alcohol every year.<sup>1</sup> In 2018, alcohol use contributed to 4.5% of the total burden of disease in Australia.<sup>14</sup> Alcohol is also an addictive substance. In 2019, the National Drug Strategy Household Survey found that 10% of people in Australia who had an alcoholic drink in the previous 12 months were likely to meet the criteria for alcohol dependence when assessed by the Alcohol, Smoking and Substance Involvement Screening Test (ASSIST-Lite).<sup>15</sup>

Nutrition content claims are marketing content, and therefore it is inherent that their use by alcohol companies is to increase purchases of products carrying this marketing. As discussed in the section below, the alcohol industry describes the use of these claims as a way to drive sales. Additionally, the evidence base shows that these claims can influence perceptions and use of products – including alcoholic products. It is therefore a significant gap that the current cost-benefit analysis disregards costs associated with alcohol harms.

**Positioning the provision of sugar information via marketing claims as a key benefit to the proposal is misguided.**

As noted above, we are very concerned that this proposal has moved away from its original intent of assessing potential harms from **alcoholic products** containing misleading sugar claims, to address sugar information provision as the primary topic. Beyond this, the conclusion that this is a key benefit for consumers is flawed, as the information is marketing material – this means that it is not provided in a standardised way across all products. There is no way for people to assess the relative sugar and carbohydrate content of products with these claims.

**Costs to industry to remove labelling that is prohibited under the Code should not be a leading factor in the cost-benefit analysis.**

Costs to industry to remove sugar content claims from their labels and associated marketing should be disregarded from the cost-benefit analysis. Alcohol companies have been using this marketing when the policy intent of the Code is clear that carbohydrate and sugar claims are regulated

separately, and therefore alcohol companies are prohibited from using them. FSANZ made this conclusion in 2018 and alcohol companies have since continued to proliferate products making sugar content claims. It is therefore disingenuous to incorporate the costs to remove this marketing in the cost-benefit analysis when companies should not have been making these claims. Furthermore, alcohol companies and their lobby groups have made highly inflated cost claims previously in relation to the introduction of warning labels. The claims of costs made by companies was significantly higher than several independent cost studies.

## Recommendation

**We recommend that FSANZ amend the Australia New Zealand Food Standards Code to prohibit carbohydrate claims being made in relation to alcoholic products.** This would also provide irrefutable clarity in the intent of the Code to prohibit the use of sugar claims for alcoholic products and have the added benefit of removing misleading carbohydrate claims. We make this recommendation because sugar and carbohydrate claims are increasingly used in relation to alcoholic products, and this can mislead people to believe alcoholic products are healthier than they are.

Nutrition content claims mislead people to believe alcoholic products are healthier than they are.

Health-oriented marketing, such as nutrition content claims, can distract from the key ingredient of health concern in alcoholic products – the alcohol content – through a ‘health halo effect’. The ‘health halo effect’ is where people perceive an inherently unhealthy product to be healthier than it actually is based on one or more favourable attributes (e.g., low carbohydrate, ‘no additives’, etc.).<sup>7,8</sup> The potential for a health halo effect from sugar and carbohydrate claims is particularly concerning when it comes to alcoholic products, given the risks associated with alcohol use regardless of the sugar or carbohydrate content.

The use of health-oriented marketing and the associated ‘health halo effect’ has been well documented for food and beverages, including ready-to-drink non-alcoholic beverages. A number of studies show that people believe a product is healthier if it carries a health or nutrition related claim<sup>16-21</sup> and a meta-analysis has concluded that health and nutrition claims have a substantial effect on dietary choices.<sup>22</sup> In the case of beverages, research similarly shows that ready-to-drink non-alcoholic beverages with health-oriented marketing are perceived as healthier alternatives than beverages without health-oriented marketing, even when these products contain similar levels of ingredients of concern (i.e., sugar content).<sup>21,23</sup> The research also shows that even when people generally consider a beverage to be unhealthy, favourable beverage characteristics can increase perceptions of beverage healthfulness.<sup>21</sup> Specific to sugar content, an Australian study with young adults (18-25 years old) found that a primary assessment of a non-alcoholic beverage is through considering the sugar content, in such way that if a beverage is considered to be lower in sugar content, it is considered healthier.<sup>23</sup>

Emerging evidence is indicating that health-oriented marketing similarly creates a ‘health halo effect’ for alcoholic products. Findings from the 2021 nationally representative LiveLighter annual Shape of Australia Survey shows that over 75% of Australian adults with alcohol use in the past year believe that health-oriented marketing claims (such as ‘low carb’, ‘no added sugar’, ‘low calorie’, ‘natural’ and ‘organic’) meant that an alcoholic product was better for them than an alcoholic product without these claims.<sup>24</sup>



We are also aware of emerging data that has been shared with FSANZ, which should be taken into consideration in this proposal. This includes:

- Data from the national 2022 Shape of Australia Survey which shows that more than half of Australians believe an alcoholic product with ‘no added sugar’ means an alcoholic product is better for their health and over a third of Australians would be influenced to buy an alcoholic product which made a ‘no added sugar’ claim.
- Data from a nationally representative survey conducted by Alcohol Change Australia which shows Australians assess an alcoholic product containing a ‘low carb’ or ‘low sugar’ claim as healthier than an otherwise identical alcoholic product and that the use of either a ‘low carb’ or ‘low sugar’ claim led to a reduction in Australians assessing an alcoholic product as unhealthy. The data further shows that a ‘low sugar’ claim would lead a proportion of people to drink more of that alcoholic product.<sup>10</sup>

The ‘health halo effect’ can also work in such way that marketing for one favourable attribute (e.g., low carbohydrate or low sugar), can result in consumer misperception that a product has another favourable, but objectively unrelated attribute (e.g., low alcohol). For example, research has found that foods perceived to be environmentally friendly, organic, or natural are also perceived to be healthier and lower in energy than alternatives despite that being untrue.<sup>8,25,26</sup>

A recent experimental study with Australian women aged 18-35 years old tested perceptions between alcohol products with marketing claims about sugar content (e.g., ‘low’, ‘zero’, ‘no added’ sugar, etc.) compared to products without these claims.<sup>9</sup> The research found that participants viewing alcoholic products with a sugar claim not only perceived alcoholic products as healthier, less harmful to health, and lower in sugar, but as also containing a lower alcohol content, despite each product being labelled with the same standard drink content.<sup>9</sup> Similarly, previous Australian research exploring perceptions of low-carbohydrate beers has found that there are misperceptions among the general community<sup>27</sup> and people who drink low-carbohydrate beer<sup>28</sup> that ‘low-carbohydrate beer’ is healthier than ‘full strength beer’; this again disregards consideration of the alcohol content of a product.

### Nutrition content claims and other health-oriented marketing claims for alcoholic products are increasing.

Alcohol companies are increasingly investing in health-oriented marketing that positions alcoholic products as healthier or better-for-you choices to capitalise on increasing consumer health consciousness; this includes marketing via label design and product innovation strategies.<sup>29</sup> There has been a fast rise of alcoholic products marketed as healthier or better-for-you, both through claims regulated under the FSANZ Code (such as energy content, sugar content and carbohydrate claims), and non-regulated claims (such as claims about alcoholic products containing ‘pure’, ‘fresh’, ‘organic’ and ‘natural’ ingredients).<sup>30-32</sup>

Two published studies provide insight into the use of nutrition content claims on alcoholic products. One study audited the website of the largest Australian liquor retailer in 2020 for health-oriented marketing of alcoholic products and found low sugar claims were present for 6.9% of alcohol products while 3.7% and 3.3% of alcohol products presented low carbohydrate and low energy claims respectively.<sup>33</sup> The second study audited the labels of 850 alcoholic products sold in the largest store of the leading alcohol retail chain in Melbourne, Australia, in 2021 for nutrition-related information and found 10.1% of products audited carried nutrition content claims on the label; 5.9% of products carried low carbohydrate and low sugar claims, while 4.8% carried low energy claims.<sup>34</sup> Both studies found that all three claims (low sugar, carbohydrate, and energy) were most frequently displayed on



ready-to-drink premixed drinks (RTDs), with approximately 1 in 5 RTDs being marketed with sugar claims.<sup>33,34</sup>

We are also aware of a recent study under peer-review for publication which has been shared with FSANZ on the use of nutrition-related claims on RTDs which shows a significant amount of products display a nutrition-related claim, including approximately a third of RTD alcoholic products making sugar content claims. This indicates that the use of these claims is increasing.

The rise of contemporary RTDs being promoted as better-for-you alcoholic products through the use of nutrition content claims and other health-oriented marketing has similarly been reported in industry news. Alcohol companies particularly view young people as a target audience for RTDs marketed as better-for-you (e.g., through low sugar claims and natural ingredients), as they are becoming an increasingly health-conscious target audience.<sup>29,35</sup>

The use of carbohydrate and sugar claims in conjunction with other health-oriented claims and marketing techniques is an important matter that should be considered in this proposal. Carbohydrate and sugar claims comprise two components of broader health-oriented/better-for-you marketing techniques that are being used to promote alcohol as a healthier choice when the public health advice is to limit alcohol intake. Recently published research shows that 52.7% of alcohol products use health-oriented marketing that is not regulated as nutrition content claims.<sup>33</sup> While we understand that health-oriented marketing other than sugar and carbohydrate claims are beyond the scope of this proposal, it is important to consider the combined effect of this marketing to position alcoholic products as healthy. The currently permitted claims of energy content claims, gluten claims, and carbohydrate claims are commonly presented together with sugar content claims. Alongside these claims, are claims about alcoholic products containing 'pure', 'fresh', 'organic' and 'natural' ingredients. The combined effect is a product and associated marketing campaign which is positioned as a healthier alcohol product. The below images illustrate some of the ways in which this marketing is currently being displayed.





Image: Alcoholic product advertised making sugar and energy content claims, gluten free claims, and claims about containing electrolytes.





Images: Alcoholic product advertised on social media with sugar and energy content claims, gluten free claim, and claims about being 'naturally brewed'.



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Image: Alcoholic product marketed as high strength alongside carbohydrate and gluten free claims, and reference to 'natural flavours'





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Image: Alcoholic product marketed with sugar and carbohydrate content claims, reference to 'keto' diet and 'worry less' slogan.

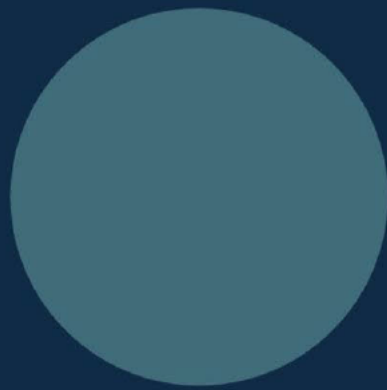
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