



Spirits New Zealand

Submission – P1049

Carbohydrate and sugar claims on
alcoholic beverages

August 2023

Introduction

Spirits New Zealand is the national trade organisation representing New Zealand's leading producers, distributors, brand owners, importers and exporters of premium spirits and spirit-based drinks. Our members are Asahi, Bacardi, Beam Suntory, Brown-Forman, Diageo, Federal Merchants, Hancocks, Lion, Moet-Hennessy and Pernod Ricard.

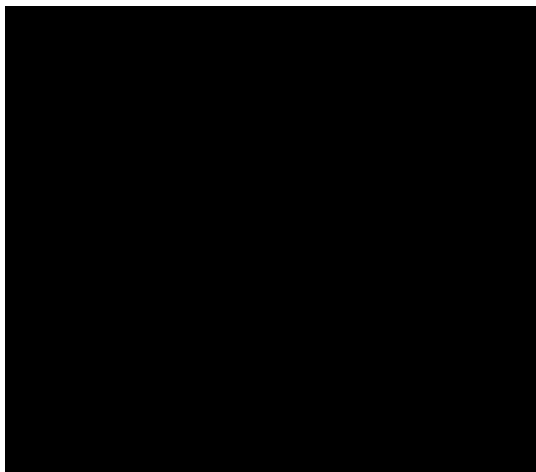
Spirits NZ represents over 96% of spirit industry interests in New Zealand. This submission also represents the views of Distilled Spirits Aotearoa Inc. DSA represents the growing and vibrant New Zealand distilling industry.

We thank you for the opportunity to submit on Proposal P1049. We note and accept comments made under *Section 2.2 – Related Proposals* with regard the impact and timing for P1059 – Energy labelling on alcoholic beverages and P1058 – Nutrition labelling about added sugars and subsequent announcements regarding P1062 – Defining added sugar for claims.

We acknowledge that all attempts are being made to progress other proposals with labelling implications in such a way so as to minimise any concomitant impacts on industry. We thank FSANZ for this consideration.

Our submission follows below.

Thank you.



Submission

1. In summary our position and comments on proposals detailed in the submission document are –

- a. We support FSANZ's position to adopt Option 2 as described in summary on page 25 of the submission document and in more detail in Appendix D. We do not support Option 3 as there are no grounds for the removal of claims from alcoholic beverages.
- b. We support the amendments to standards as detailed in Attachment A of the submission document.
- c. We acknowledge that in drafting the amendments to existing standards FSANZ is proposing to –
 - i. Clarify the use of/definition of "sugar".
 - ii. Allow for the use of "carbohydrate" specifically but not any subset of this term (e.g. such as "fibre").
 - iii. Allow for other claims as specifically listed in the proposed standard.
- d. We note that in undertaking the background analysis on the consumer impact of claims FSANZ has found -

There is no clear evidence to suggest that sugar and carbohydrate claims affect consumers' level of consumption of alcoholic beverages.¹

2. We now answer the specific questions as put in the submission document.

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?

(b) level of physical activity?

(c) general food intake?

Other than what we (or our members) have already supplied during the consultation process on this matter we are not aware of any additional information or evidence.

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?

Other than what we (or our members) have already supplied during the consultation process on this matter we are not aware of any additional studies.

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.

We do not support Option 3. If this option was being considered we would want to examine the labelling costs more closely and understand the methodology used to create them. We acknowledge that FSANZ has standardised such methodology and has used, in part, industry-supplied data to do this.

¹ Page 19 submission document.

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?

Other than what we (or our members) have already supplied during the consultation process on this matter we do not have any additional information on this topic.

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

In principle yes.

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

Other than what we (or our members) have already supplied during the consultation process on this matter we do not have any additional information on this topic.

Ends