



**National Heart Foundation of Australia:
Submission to Food Standards
Australia New Zealand on P1049
Carbohydrate and sugar claims on
alcoholic beverages**

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For further information please contact:

[Redacted contact information]

About the Heart Foundation

For more than 60 years the National Heart Foundation of Australia (Heart Foundation) has led the battle to save lives and improve the heart health of all people living in Australia. Through the generosity of our donors the Heart Foundation advocates to improve public health and nutrition and is guided by the below nutrition principles:

- Be grounded in a strong evidence base; both the contemporary evidence for dietary patterns, foods and nutrients in reducing cardiovascular risk and improving health outcomes, along with implementation evidence for effective activities which help to reduce, and not widen, inequities in nutrition-related health status for all Australians.
- Enable transparent labelling of food on packaged food products, alcoholic beverages and a nationally uniform mandatory labelling of kilojoules for foods purchased outside the home.
- Establish and implement supportive food and nutrition policies that place a strong emphasis on healthy food and drink environments outside the home, which include; reformulation, portion size and the price, promotion and marketing of unhealthy and healthy foods.
- Improve equitable and reliable access to affordable, nutritious food for those living in remote and non-remote Australia to minimise dietary related risk factors for cardiovascular disease and other chronic diseases.
- Ensure transparent governance, monitoring, reporting and surveillance of dietary intake and nutritional status of the Australian population, including regular National Nutrition Surveys.

Introduction

The Heart Foundation welcomes the opportunity to provide a submission to Food Standards Australia New Zealand (FSANZ) on proposal P1049 regarding carbohydrates and sugar claims on alcoholic beverages.

The Heart Foundation acknowledges the context for which FSANZ were requested to consider carbohydrate and sugar claims on alcoholic beverages. Proposal P1049 was prepared in 2018 to clarify the Australia New Zealand Food Standards Code (the Code) with respect to potentially misleading claims. This was in response to Food Ministers' concerns that '% sugar-free', 'lower carb' or 'low in sugar' claims are misleading, and that alcohol is being promoted as a healthy choice for consumers.

The concerns by Food Minister's echo the concerns of public health organisations. An emerging trend in Australia are alcoholic beverages marketed as 'better-for-you', whereby nutrient content claims are promoted on product labels to create an illusion of healthfulness.¹ Nutrient content claims of carbohydrates and sugar on alcoholic beverages are marketing techniques used to distract from the harmful health implications of alcohol consumption. Permitting nutrient content claims on alcoholic beverages is in the detriment of public health.

Summary of submission recommendations

- 1 FSANZ removes the permission in the Code which enables nutrient content claims on alcoholic beverages.
- 2 FSANZ prioritises high quality evidence and includes the impact of nutrient content claims and their influence on consumer purchasing and behaviour.
- 3 Alcohol-related harms are considered in cost-benefit analysis.

Alcohol consumption and cardiovascular disease

The relationship between alcohol consumption and cardiovascular disease is well established to be harmful.² The risk for most cardiovascular diseases, including hypertensive heart disease, atrial fibrillation, cardiomyopathy, and stroke, increases with alcohol consumption.³

New research has strengthened the body of evidence on the negative impacts of alcohol consumption on cardiovascular outcomes. There is strong evidence that alcohol intake increases the risk of hypertension, a major risk factor for cardiovascular disease and stroke.⁴ Even small amounts of alcohol increase the risk of atrial fibrillation and haemorrhagic stroke and may also increase the risk of heart failure and coronary heart disease.⁵

Mendelian randomisation studies, a robust analytical method used to examine the causal effects of modifiable risk factors on disease, have questioned the scientific validity of a perceived cardioprotective effect, concluding that previous research findings may have been biased by confounders or reverse causality bias. Conclusions from mendelian randomisation studies have found that alcohol consumption of any amount was associated with increased cardiovascular disease risk.^{6,7}

These risks, and the association between alcohol and other serious health conditions, including several types of cancer,⁸ is strong enough to not recommend a safe level of alcohol consumption.⁹

The Heart Foundation does not recommend that people drink alcohol for heart health. For people who don't drink alcohol, the advice is to not start drinking. For people who choose to drink alcohol, drinking less lowers the risk of cardiovascular disease. This aligns with the latest recommendations from the World Heart Federation (2022) and reflects the current evidence on alcohol use and cardiovascular disease.¹⁰

Recommendation 1: FSANZ removes the permission in the Code which enables nutrient content claims on alcoholic beverages.

The Heart Foundation strongly opposes the permission within the Code which allows carbohydrate and sugar nutrient content claims on alcoholic beverages. The proposed amendments to the Code do not address the primary concerns Food Ministers raised in 2017.

Enabling marketing and advertising of varying quantities of carbohydrate and sugar content within alcoholic beverages continues to mislead consumers in making incorrect assessments on the healthiness of alcoholic beverages. A clarified understanding of carbohydrates and sugar content does not outweigh the negative impact of alcohol content.

Consequently, allowing nutrient content claims on alcoholic beverages undermines national and international guidelines which recommend limiting alcohol. The Heart Foundation recognises that FSANZ has considered both alcohol and sugar guideline recommendations in their evidence assessment. However, the strengthened evidence associating any alcohol consumption and cardiovascular disease outcomes demonstrates preferential, if not sole, weighting must first be given to guideline recommendations which seek to reduce alcohol consumption.

With regards to sugar, the proposal considers Australian and New Zealand dietary guidelines which recommend choosing foods with the lowest amount of added sugar by comparing the sugar content on food labels. However, this recommendation should not be considered in this proposal, as the recommendation relates to food, not alcohol. To ensure appropriate

comparisons between food labels, the Code mandates key nutrients identified in a prescribed manner in a nutrition information panel.

Enabling carbohydrate and sugar nutrient content claims on alcoholic beverages highlights two major labelling flaws:

1. The current inconsistency between mandated versus voluntary nutrition information panels does not enable consumers to make appropriate comparisons across alcoholic beverages. A mandatory nutrition information panel is only stipulated when a nutrient content claim has been made, otherwise it remains voluntary. Research conducted in Victoria, Australia, concluded that most alcoholic beverages sampled (80.2%) did not voluntarily provide a nutrition information panel.¹¹
2. Should proposal P1059 Energy labelling on alcoholic beverages proceed in accordance with FSANZ's call for submission,¹² further inconsistencies are created, whereby some alcoholic beverages will feature a truncated energy panel, and others a full nutrition information panel.

Mandating a nutrition information panel on certain alcoholic beverages which make nutrient content claims, contrasts with the rationale proposed for mandatory energy labelling across all alcoholic beverages. Proposal P1059 specifies an information panel read 'Energy Information' rather than 'Nutrition Information' to delineate between alcoholic beverages and food and non-alcoholic beverages. The inconsistencies are made further apparent by commentary which noted that labelling of alcoholic beverages nutritional composition was deemed of minimal significance, except for alcohol and energy.¹² On this basis, carbohydrates and sugar claims are not necessary.

Enabling carbohydrate and nutrient content claims on alcoholic beverages does not address Food Minister's concerns of misleading claims and inadvertently creates further labelling confusion. National and international guidelines recommend limiting alcohol consumption and strengthened evidence reveals there is no safe level of alcohol consumption. Enabling nutrient content claims shifts consumer focus to carbohydrate and sugar content which detracts from the harmful health implications of alcohol consumption.

Recommendation 2: FSANZ prioritises high quality evidence and include the impact of nutrient content claims and their influence on consumer purchasing and behaviour.

In 2018, Food Ministers raised concerns around sugar claims on alcoholic beverages, and following a technical assessment found issues extended to carbohydrate claims. An outcome of the Food Minister's Meeting in June 2018, was recorded in the meeting communique, stating: "FSANZ has agreed to raise a proposal... in line with the original policy intent that prohibits claims on alcoholic beverages in relation to sugar and carbohydrate."

Marketing, label design and product innovation strategies which includes the use of nutrient content claims are being used by the alcohol industry to promote certain beverages as healthier choices.¹³

There is extensive use of nutrition-related claims on alcoholic beverages in Australia, particularly on ready-to-drink products such as hard seltzers.¹⁴ Despite the Code currently permitting only carbohydrate and sugar content claims on alcoholic beverages, on products making claims prevalence data has recorded claims referring to naturalness (32%), sugar content (32%) and energy content (32%).¹⁴

Low sugar and related claims on alcoholic beverages generates a health halo effect, whereby consumers generalise a favourable attribute such as low sugar to misperceive

other favourable health-related attributes, including low alcoholic content.¹⁵ The extension of favourable attributes include less harmful to health, lower in kilojoules, suitable for weight management and a healthy diet. Most importantly, when compared to identical drinks participants perceive drinks with low sugar claims to be lower in alcohol, despite equivalent alcohol content.¹⁵

This data is corroborated by findings from a recently conducted online survey assessing Australians' perceptions of carbohydrate and sugar claims on alcoholic beverages, and the impact of these claims on consumption. Alcoholic beverages containing a low carbohydrate or sugar content claim were perceived as healthier when compared to the identical counterpart.¹⁶ Participant's understanding that alcohol is unhealthy, reduced when nutrient content claims were added, from 48% to 40% (carbohydrate) and 37% (sugar). Concerningly, one in five people reported their intention to consume more when a low sugar claim was on an alcoholic beverage.¹⁶

Recommendation 3: Alcohol-related harms are considered in cost-benefit analysis.

Any amendments to the Code regarding labelling of alcoholic beverages must consider alcohol-related harms.

The cost-benefit analysis applied to this proposal underestimates the benefit from removing promotional labelling on alcoholic beverages by not considering the impact of reduced alcohol consumption, alcohol attributed health outcomes, and alcohol-related harms. Research has identified that labelling interventions to alter choice have been associated with decreased alcohol use.¹⁷ Policies which aim to decrease population-level alcohol consumption must be prioritised. Small reductions in health-related harms from low alcohol consumption greatly outweigh the increased risk of other health-related harms, such as cancer.¹⁸

The Australian Institute of Health and Welfare estimated social costs of alcohol use to be \$66.8 billion in 2017–18.¹⁹ The cost benefits from reduced alcohol consumption warrants stricter labelling approaches and stronger variations in the Code, including the removal of the permission to make carbohydrate and sugar content claims on alcoholic beverages.

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