

## Submission

September 2023

### FSANZ Proposal 1049 – Carbohydrate and sugar claims on alcoholic beverages

Spirits and Cocktails Australia and the Australian Distillers' Association support the proposal by Food Standards Australia New Zealand (FSANZ) to amend the Standard 1.2.7 to clarify what content claims about carbohydrate and sugar for alcohol beverages are permissible.

As FSANZ noted in its consultation document, alcohol beverages with sugar and carbohydrate claims have been in the market for many years, and increase consumer choice. We note that in preparation for this proposal, FSANZ undertook a technical assessment of studies around the effects of these types of claims on consumer behaviour, and found no conclusive evidence that these claims would change the total volume consumption of alcohol.

We note that while these types of claims have been established as a common part of the market over the last 20 years for beer, cider and pre-mixed spirits drinks in Australia and New Zealand, at the same time there has been a significant reduction in per capita alcohol consumption across both nations. At the same time, there is an increasing concern by consumers, backed by World Health Organisation messaging, that reducing the consumption of sugar will reduce the risk of certain non-communicable diseases.

For pre-mixed spirits, even when the alcohol content is the same, there is a significant difference in both the energy content and sugar content of these beverages, depending on whether they contain sugar-free or low sugar mixers (cola, tonics and other sodas), as evidenced in Table 1 of the FSANZ consultation paper. By highlighting these differences with low sugar or low carbohydrate claims, these products are giving consumers informed choices about different product options within categories, depending on their nutritional preferences. As FSANZ noted, consumers value these claims, particularly when considering dietary guidelines around sugar consumption.

We do not wish to raise any concerns with the proposal to prohibit nutrition claims about specifically named sugars, nor about the components of carbohydrates (other than sugar/sugars). We support Option 2, and agree it represents the greatest net benefit to the community.

We note that this proposal has been prepared in the broader context of the ongoing work being undertaken on P1059 – Energy labelling on Alcoholic Beverages. As noted in that process, Spirits and Cocktails Australia and the Australian Distillers Association support the labelling of energy information on beverage containers, and will continue to work with FSANZ as it considers the most optimal labelling format to provide consumers with information in a meaningful way that allows for informed choices. We believe that future energy labelling requirements will address some of the stakeholder concerns raised that led to the creation of Proposal 1049 in the first instance.

For more information on this submission, please contact

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