



20th March 2023

Energy Labelling on Alcoholic Beverages Proposal  
Food Standards Australia & New Zealand  
PO Box 5423  
KINGSTON ACT 2604

Via email to [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

**Response to the call for submissions– Proposal P1059 Energy labelling on alcoholic beverages**

I write to you today, to humbly ask that you reconsider the proposal to introduce energy labelling on alcoholic beverages. My name is James McCall and I am the co-founder and director of brewing operations.

Small craft breweries are a vibrant, entrepreneurial industry that has grown significantly in Australia - 650+ breweries have an economic output of \$1.93 Billion, employing 6,891 people. For every direct job within the industry, 3.8 jobs are created in agriculture, manufacturing, supply and hospitality - meaning the industry supports over 33,000 jobs. Within South Australia, 72 breweries operate; providing just over 2,000 jobs, boosting tourism and supporting local communities.

I would like to echo submissions made by both the national Independent Brewers Association and also the South Australian arm of the IBA, and make the following points.

- The economic climate currently for small breweries is very uncertain. We are experiencing a downturn in spending and patronage, with numbers still well below pre-Covid times. Revenue is dropping and the cost of goods is still increasing at a rapid rate. Any unforeseen costs, like a packaging change will be detrimental to our industry
- Any labelling change unproportionally affects smaller brewers. With smaller volumes runs, any changes to packaging take a long time to recoup. We specialise in many small releases of limited release beers, as well as an ongoing range of core beer. The addition of the mandatory pregnancy logo cost us thousands of dollars in graphic design fees, and ongoing costs of changing repeat labels as new stock is ordered. If this change was to come in, along with other proposed changes it would mean another label info panel redesign, more graphic design fees and ongoing time and costs in replacing the old info panel with the new one for every single SKU we package going forward.
- Reading Section 5 of the proposal, I would submit the economic impact on my business would be detrimental. I currently have 29 SKUs. If each SKU has to be relabelled that would mean a cost of \$509,936. These costs would mean our business is unable to continue employment of key personnel and quite frankly make the business unprofitable and fail.

- Within the FSANZ submission there are references to an education campaign needed to help consumers understand the energy within alcoholic beverages. We would ask that this campaign is started in earnest before a labelling change is proposed.
- We also call for more in depth studies to ascertain the effectiveness of energy labelling, when all studies presented have concluded that there is no significant effect on consumer buying or consuming behaviour. This is a big change for our industry, and we would like to be a part of the consultation process.
- We propose that FSANZ abandon any plans of a full Nutritional Information Panel on labels for craft breweries in order to avoid consumer confusion and reduce consumers' intentions to buy.

If you would like to speak to me in regards to this submission, please find my contact details below.

Kind Regards.

[REDACTED]

[REDACTED]