



Food Standards Australia New Zealand
PO Box 5423
KINGSTON
ACT 2604
AUSTRALIA

Via email: submissions@foodstandards.gov.au

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Response from the Brewers Association of Australia to the Call for submissions on Proposal P1059 - Energy labelling on alcoholic beverages

The Brewers Association of Australia welcomes the opportunity to provide this submission in relation to the proposal by FSANZ to amend the Australia New Zealand Food Standards Code to provide energy (kilojoule) labelling information on alcoholic beverages.

Before providing our views on the proposal I would like to express my appreciation to the team at FSANZ for the thorough and rigorous consultation process that has been run.

Brewers Association Support for Mandatory Energy Labelling

The Brewers Association of Australia strongly supports providing kilojoule (kJ) information to consumers and we support the proposal from FSANZ accordingly.

We agree that energy labeling should be mandatory as this will ensure consistency of information to consumers. We also believe that an on-label solution is preferable as this will mean a single, common place for consumers to look to for nutritional and other information on the product.

We agree that a truncated Nutrition Information Panel (NIP) should be used on label to present the kJ information but believe that a slightly different format should be available than the option presented in the call for submissions. We believe that producers should have the option to use a simpler version of the truncated NIP which reflects Examples 3 and 4 in the discussion paper circulated to stakeholders in July 2022:

Example 3: Omit serving information

Nutrition Information		
	Quantity per serving (X mL)	Quantity per 100mL
Energy	kJ (Cal)	kJ (Cal)

Example 4: Omit heading and serving information

	Quantity per serving (X mL)	Quantity per 100mL
Energy	kJ (Cal)	kJ (Cal)

These options present a clear statement of kJ content without any other figures which could confuse consumers and also ensure that consumers do not get confused between servings per package and standard drinks per package (which is already featured on the label).

We note that many beer products already contain information on kJ content either because there is a sugar or carbohydrate claim on the front of the product or because the producer has simply chosen to include it.

We support the timeline for implementation set out in the proposal and believe that a three-year transition period and a stock-in-trade exemption is adequate. We note the comment in the paper that review P1049 into sugar and carbohydrate labelling is being considered in tandem with this review. We believe that successful implementation of the P1049 review and the adoption of mandatory energy labelling should address the issues that led to this being considered and agree it is critical they are managed to the same timeline.

Finally, we agree with the paper that energy labelling is only one step in improving consumer understanding of kJ content. We note the research findings that are cited in the paper as follows:

- *“Results from 22 studies showed that, based on their general knowledge, consumers generally have a poor understanding of the energy content of alcoholic beverages” p.15.*
- *“Results from 16 studies showed that energy labelling (in kilojoule/calorie numerical format) has no effect on consumers’ likelihood of drinking an alcoholic beverage.....it remains unclear whether energy labelling has an effect on other relevant behaviours” p.16.*

Given this challenge we support the idea of an education campaign for consumers on energy set out in 7.2 of the paper and that industry is also engaged in the design and delivery of this campaign along with health professionals and state, territory, Australian and New Zealand governments.

Energy and carbohydrate content in beer

We note the research findings cited in the paper that consumers generally have a low level of awareness that alcohol itself is high in energy and that it is usually the main source of energy in alcoholic beverages.

One consequence of this, as mentioned in the paper, is that “consumers tend to overestimate the relative energy content of beer. That is, beer is mistakenly perceived as being higher in energy compared to other alcoholic beverages.” (p.15).

We also note that the paper cites research conducted by the Victoria Health Promotion Foundation which states that “consumers chose to drink low-carbohydrate beer over other types of beers (including light alcohol strength beer) because they mistakenly believed it to have less kilojoules and to be less fattening”. We note that whilst it is true that the alcohol strength of beer influences the energy content it is also true that low carbohydrate beer is significantly lower in kJs than beer with a regular

carbohydrate content. Carbohydrate content is therefore useful information for beer drinkers who want to consume a full strength beer but want to reduce the carbohydrate content (and therefore the kJ content) of what they are consuming.

Truncated NIP Format and Design

We note the proposed approach to the format of the truncated NIP as set out in 5.3.7.

Many beer producers currently use this full range of information and voluntarily include NIPs on their products.

We are, however, opposed to the mandatory proposed format set out in 5.3.7. The three lines of information at the top of the label are not useful at best, and at worst may actually confuse consumers:

ENERGY INFORMATION		
Servings per package: (insert number of servings)		
Serving size: mL		
	Quantity per serving	Quantity per 100 mL
Energy	kJ (Cal)	kJ (Cal)

The information is not useful because the servings per package of beer will almost always be one. In addition, the serving size in mL is already required to be displayed elsewhere on the packaging.

More importantly, however, we do believe there is a risk that mandating servings per package may confuse consumers who are also using the standard drink labelling on bottles.

We strongly recommend the use of a simpler version of the truncated NIP as proposed in Examples 3 and 4 above.

This would allow a straightforward presentation of kJ content and prevent consumers being confused with multiple different figures on a label.

Nor is it necessary for the proposed NIP to be standardized with NIPs required on other non-alcohol products. As has been argued above, there are key ingredient and regulatory differences between alcohol and non-alcohol products meaning that including information commonly found on non-alcohol NIPs is unnecessary and likely to confuse consumers.

Evidence Assessment – Consumption of Alcoholic Beverages

For the purposes of assessing alcohol consumption trends and patterns in Australia we believe the two key data sources are the Australian Bureau of Statistics Apparent Consumption of Alcohol series and relevant datasets from the National Household Survey by the Australian Institute of Health and Welfare.

To ensure consistency and reliability we believe that these government sources are the best to use.

We note that the paper cites a snapshot of current drinking levels for the purposes of the evidence assessment. We believe FSANZ should also consider the historical trends in consumption levels. These show that alcohol consumption in Australia has been falling for almost 50 years and there has been considerable progress in reducing risky/heavy consumption.

For the purposes of this review it is relevant that Alcohol consumption in Australia peaked at 13.1 litres of pure alcohol per person in 1974-75 and then fell 25 per cent to 9.51 litres per capita in 2017-18

(ABS, Apparent Consumption of Alcohol, 2017-2018). This is a dramatic reduction and would mean a very significant reduction in the kJs consumed through alcohol over this period.

For beer the trend has been even more pronounced. Per capita consumption of pure alcohol from beer has dropped by over 30 per cent in the past 25 and the shift amongst consumers to mid, low and zero strength beers, which now make up over 30 per cent of the beer market, has meant that beer drinkers have reduced their consumption of pure alcohol through beer by around 3 million litres over the past decade (*Research paper by* [REDACTED]).

Yours sincerely,

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