

ACKNOWLEDGED

24 May 2011

SCANNED

Standards Management  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra ACT 2601

ENTERED IN SMS / CDS

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

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Dear Sir / Madam

**RE: Applications A1026 – Minimum Alcohol Content for Wine**

Woolworths welcomes the opportunity to provide comments in relation to the application of the Winemakers' Federation of Australia (WFA) to reduce the minimum alcohol content permitted in Standard 4.5.1 for wine and sparkling wine produced in Australia from 8% to 4.5%.

Woolworths supports this proposal.

Woolworths is a major operator of packaged liquor outlets in Australia operating more than 1,100 liquor stores across Australia under the Woolworths Liquor, BWS and Dan Murphy's brands. Woolworths fully accepts that it has a key responsibility to work with the Government, industry and the community to minimise harm to individuals and local communities. It is for this reason that we continue to operate our liquor business beyond the required standards of legal compliance and have implemented a wide range of voluntary product and service control initiatives across our stores which are focussed on responsible supply and promotion of alcohol (many of which have been subsequently adopted by other industry participants). These initiatives include:

- launch of the ID25 program supported by staff training and point-of-sale material. Under this program, if a customer looks under the age of 25 our staff will ask to see proof of age identification prior to selling alcohol to that customer;
- launch of "Don't Buy It For Them" Secondary Supply Program supported by staff training and point-of-sale material;
- launch of the Woolworths Liquor Group responsible buying charter incorporating ranging prohibitions on products that are packaged and marketed irresponsibly and de-ranging all RTD products that contain more than two standard drinks in a single serve container; and
- ongoing point-of-sale information campaigns on responsible drinking. Examples include explanations of standard drink icons, a campaign to encourage consumers to measure rather than free-pour spirits and a specific campaign targeted at Schoolies areas.

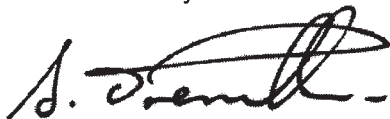
In addition to these initiatives, Woolworths is committed to providing customers with choice in relation to the types of alcohol products they can purchase including providing options for those customers who are looking to reduce their alcohol consumption through lower alcohol products. It has been Woolworths' recent experience that customers are increasingly interested in purchasing lower alcohol products and, to respond to this, Woolworths has in recent years introduced a range of liquor products in our stores to support these choices – this has included a range of wine based beverages which have a lower alcohol content than 8%. As FSANZ would be aware, where these products have an alcohol content below 8%, these products must be labelled "wine product".

Whilst customers are looking for lower alcohol products, Woolworths believes that a number of customers have been unwilling to sample and purchase products labelled "wine product". Woolworths understands that that is due to a customer perception that, because it is not labelled wine in the traditional sense, the product is either of inferior quality or does not have the same taste attributes as other wine products. In other words, the fact that these lower alcohol products cannot be labelled wine is acting as an inhibitor to customers purchasing such products (even though wine with a similar alcohol content imported from overseas is labelled wine). Woolworths believes that the amendment of Standard 4.5.1, allowing such products to be labelled wine, will be a positive step in overcoming this issue. Retailers will be better able to market lower alcohol wine products as an alternative to customers supporting customer choice and growing the customer market for such products. This will, in turn, enable a greater range of similar products to be introduced to store.

We believe this will be a positive development as Australian customers will have a greater choice of lower alcohol products. This is consistent with the Federal, State and Territory Government's respective harm minimisation and responsible consumption policy objectives.

We trust the information contained in this letter will assist FSANZ with its consideration of this application. Should you require any further information regarding this submission, please do not hesitate to contact Charlie Beasley, Public Policy Manager on 02 8885 9133 or at [cbeasley@woolworths.com.au](mailto:cbeasley@woolworths.com.au).

Yours sincerely



**Shane Tremble**  
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**Woolworths Limited**