



BREWERS
ASSOCIATION
OF AUSTRALIA & NEW ZEALAND Inc.

Submission to FSANZ
P293 Nutrition, Health and Related Claims
30 March 2012

Executive Summary

The Brewers Association promotes the consumption of beer in moderation. Beer has the lowest alcohol content of the alcohol beverage categories. Beer provides enjoyment and social interaction for many people and can be part of an adult's healthy lifestyle.

The Brewers Association acknowledges that FSANZ seeks to find a balanced position on the difficult issue of health and nutrition claims.

While the Brewers Association remains of the belief that consumption of alcohol in moderation has health benefits for many people, it recognises the concerns which have resulted in the prohibition on health claims for alcohol beverages.

The Brewers Association does not agree with the introduction of standard P293 but if the standard does progress then the Association recommends a number of amendments.

The Brewers Association seeks clarity regarding the use of the term "full strength" in relation to beer, which it understands is permitted under the standard. However this understanding may not be accepted by all and *it is therefore requested that this term "full strength" which is readily understood by consumers be clearly permitted in the final Standard.*

The Brewers Association believes that where there are specific nutritional aspects relating to different beers, these should be able to be communicated to consumers. Some of these have been addressed in the draft Standard, specifically claims relating to energy and carbohydrate. (Part 2, Clause 3), however, other nutrition content claims for example, gluten, are prohibited. We are of the view that gluten should be included.

Introduction

The Brewers Association of Australia and New Zealand (Brewers Association) seeks to provide a response to the request for comment on the P293 draft Standard 1.2.7 Nutrition, Health and Related Claims. This submission is related to Clause 3, of the Draft Guidelines, which limits claims relating to products containing more than 1.15% alcohol.

The Brewers Association does not agree with the introduction of standard P293 but if it does progress then the Association recommends a number of amendments.

The Brewers Association is the association for manufacturing brewers in both Australia and New Zealand with the core purpose to celebrate beer, its contribution to the economy and to social wellbeing through responsible consumption.

Membership of the Brewers Association comprises the Foster's Group, LION, Coopers and DB Breweries. Members of the Brewers Association manufacture well over 90% of beer produced both in Australia and New Zealand.

The Brewers Association promotes the consumption of beer in moderation. Beer has the lowest alcohol content of the alcohol beverage categories. Beer provides enjoyment and social interaction for many people and can be part of an adult's healthy lifestyle.

The Brewers Association concurs with research findings that drinking alcohol in moderation can have beneficial outcomes for many aspects of health.

It is acknowledged by the Brewers Association that there are adverse health risks from immoderate consumption of alcohol. It is also understood from the Brewers Association that effects of alcohol consumption on a person's health are significantly influenced by each individual's lifestyle and genetics. The Brewers Association is, therefore, of the view that any regulatory action needs to consider the balance between the need to discourage the excess alcohol consumption and the need to provide appropriate information to consumers to allow them to make sensible and responsible decisions.

Comment on Clause 3

The Brewers Association acknowledges that FSANZ seeks to find a balanced position on the difficult issue of health and nutrition claims. The balance between ensuring that claims are scientifically sound and allowing innovation is indeed hard to define.

The Brewers Association has however been restricted from making health claims which could well be justified from a review of the medical literature, such as the apparent reduction in cardiovascular risk associated with moderate alcohol consumption.

What it has sought from the development of the Standard is the ability to ensure that consumers have available appropriate information about specific products so that they are able to make informed choices. The draft Standard has permissions for the beverages greater than 1.15% alcohol to use nutrition content claims for energy and carbohydrate.

What is not so clear however is use on labels of terms such as “mid-strength” and “full strength”. These terms are well understood by consumers and it is clearly useful that they continue to be used. It can be argued that “mid-strength” is covered under Clause 5 as a statement relating to moderating alcohol intake. There is no similar interpretation available in the case of “full strength”. It is clearly not the intent with either of these terms to encourage excessive consumption. The terms are to provide the consumer with appropriate information.

The Brewers Association therefore requests FSANZ to ensure that the Standard includes permission for commonly used and understood terms which are not nutrition content claims as such. Such terms include “light”, “mid-strength” and “full-strength”.

The Brewers Association is aware that some brewers are making “gluten” claims. By prohibiting the claim, it is our view that the standard will restrict access to healthy choices for drinkers who are sensitive to gluten. There will be beer drinkers who wish to drink in moderation who will be unable to easily choose the beer most suitable to them.

The Brewers Association therefore requests FSANZ to ensure that the Standard includes permission for “gluten claims” in beer.