20 March 2023

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604

By email: submissions@foodstandards.gov.au

Proposal P1059 – Energy labelling on alcoholic beverages

We welcome the opportunity to provide a submission to the consultation on Food Standards Australia New Zealand's (FSANZ) proposal to provide energy labelling information on alcoholic beverages. Alcohol Change Australia supports the implementation of standardised, mandated, evidence-informed energy labels on alcoholic products to help support Australians to make informed dietary decisions. However, in the absence of any consumer testing, we have concerns about the introduction of the proposed energy label outlined in Proposal P1059. Our submission highlights that there is an urgent need for consumer testing to understand the potential impacts of energy labelling on a range of health behaviours, including alcohol use.

About Alcohol Change Australia

Alcohol Change Australia (ACA) is a group of health and community organisations working to prevent and reduce alcohol harm in Australia. Formerly the National Alliance for Action on Alcohol, ACA encourages policy change to improve the health and wellbeing of our community.

Alcohol takes a significant toll on our communities, fuelling violence, injuries, and deaths. Every day, 15 people die from alcohol-related harm in Australia.[1] In 2018, alcohol contributed to 4.5% of the total burden of disease and 15% of the overall burden of injury.[2] Alcohol use is causally linked to over 200 disease and injury conditions,[3] and causes at least seven types of cancer. Prenatal exposure to alcohol increases the risk of Fetal Alcohol Spectrum Disorder, the leading cause of preventable developmental disabilities in Australia.[4] Some of those most at harm from alcohol include children and young people, those living in rural and remote areas, high risk drinkers and people living with mental illness.

The introduction of energy labels on alcoholic beverages must consider impacts on alcohol use as well as dietary behaviours

We understand that the driver for the introduction of energy labels on alcoholic beverages is to help address increasing rates of overweight and obesity and support Australians to make informed dietary decisions. Despite the significant levels of alcohol-caused harm the Australian community experiences, the impact of

[1] Lensvelt, E et al. Estimated alcohol-attributable deaths and hospitalisations in Australia 2004 to 2015. National Alcohol Indicators, Bulletin 16. 2018. Perth: National Drug Research Institute, Curtin University.
[2] Australian Institute of Health and Welfare. Alcohol, tobacco & other drugs in Australia, Health impacts - Australian Institute of Health and Welfare. December 2022. Available from: https://www.aihw.gov.au/reports/phe/221/alcohol-tobacco-other-drugs-australia/contents/impacts/health-impacts
[3] Rehm J et al. The relationship between different dimensions of alcohol use and the burden of disease—An update. Addiction. 2017;112(6):968-1001.
[4] Foundation for Alcohol Research and Education. What you need to know about Fetal Alcohol Spectrum Disorder. 2021. Available from: https://everymomentmatters.org.au/resources/

energy labelling on alcohol use has not been considered. It is important that health outcomes associated with energy labels are considered holistically. Any impact of energy labelling on people's health must consider both the potential impact on overweight and obesity and alcohol use. It is essential that provision of energy information for alcoholic products supports rather than undermines the important public health objective of reducing alcohol harm.

Energy labelling on alcoholic beverages should be standardised, mandatory and evidence-informed

ACA supports the implementation of evidence-based policies that work to reduce rates of overweight and obesity in Australia, including the introduction of energy labels. In particular, ACA supports the following aspects of FSANZ's proposal:

- to require the energy content on alcoholic products be provided in kilojoules,
- to require energy content information be provided on alcoholic beverages per 100ml of the beverage to enable comparison between products, and
- to apply the information consistently to all categories of alcoholic products.

While we support the provision of energy information per 100ml to enable comparison between products, per 100ml should be presented as one of two measures on the energy label. As discussed further below, the presentation of energy information in a range of formats across a range of products should be tested with consumers to identify the most appropriate measure to include.

ACA strongly supports a mandatory energy label on alcoholic products. We agree with FSANZ's position that a mandatory approach would ensure greater coverage and consistency of energy labels. The labels should apply to all categories of alcoholic beverages, and there should not be exclusions for alcoholic products made and packaged on the premise from which it is sold (e.g. wineries, breweries, distilleries) or for alcoholic products that are delivered packaged and ready for consumption (e.g. orders delivered to consumers by a liquor retailer).

Consumer testing of proposed energy labels is needed

We have several concerns regarding FSANZ's proposal. Firstly, we do not support FSANZ's proposed approach that permits producers to determine what a 'normal' serving size is for their products. We are concerned about the provision of energy information 'per serving' as it may create a perception that there is a 'safe' or 'healthy' serving of alcohol, which is highly problematic for a product that causes substantial harm to the community. We share the concerns noted in FSANZ's proposal that the use of a per serving measure may imply a recommended serve of alcohol in excess of a standard drink, which may unintentionally lead people to drink more. For example, the proposed approach would permit an alcohol producer to apply an energy label to a bottle of spirits that lists a serving size of 40ml. People may drink this amount assuming the serving size listed is a standard drink, when in fact a standard drink is the equivalent of 30ml of spirit. This potential for confusion works directly against efforts being invested to increase community awareness and understanding of standard drinks and the NHMRC Australian guidelines to reduce health risks from drinking alcohol.

Secondly, we do not support the introduction of an energy label that has not been tested with consumers for potential intended or unintended consequences related to alcohol use. The proposal notes that the current body of evidence only examines the effect of energy labelling on people's likelihood of consuming a single alcoholic beverage. It is not known what effect energy labelling has on other relevant health behaviour, such

as the number of drinks consumed over time. No studies have examined the effect of providing energy content information based on different quantities i.e. per 'serving size', per standard drink, or per 100 mL.

Without any consumer testing, it is unknown how Australians will interpret the proposed labels. For example, there is the potential that the proposed label could lead to people believing that particular quantities are 'recommended', or create confusion with standard drinks. Given the rapid systematic review undertaken by FSANZ indicates that consumers generally have a poor understanding of the energy content of alcoholic beverages, ACA has concerns with progressing with an energy label that has not been tested with Australian consumers.

ACA strongly encourages FSANZ to conduct consumer research to understand how Australians will interpret the energy information panel. Energy information presented in 100mL, container size, and standard drink across a range of products should be tested to identify any unintended consequences when it comes to alcohol use.

Recommendations

We make the following recommendations:

1. Health outcomes associated with energy labels on alcoholic products must be considered holistically. Any impact of energy labelling on health behaviours must consider both the potential impact on overweight and obesity and alcohol use.
2. Energy labels on alcoholic beverages should be standardised, mandated, and evidence-informed. Mandatory labelling should be applied consistently across all products and there should not allow be exclusions for alcoholic products made and packaged on the premise from which it is sold (e.g., wineries, breweries, distilleries) or for alcoholic products that are delivered packaged and ready for consumption (e.g., orders delivered to consumers by a liquor retailer).
3. Energy labels on alcoholic products should not present energy information in a 'per serving' measure that is determined by producers.
4. Prior to the adoption of an energy label, consumer testing should be conducted to consider the impact of energy information presented in 100mL, container size, and standard drink across a range of products on a range of health behaviours, including alcohol use.

Thank you once again for the opportunity to make a submission to this proposal. Any questions regarding our submission, please contact Hannah Pierce, Executive Officer – Alcohol Change Australia, at hannah.pierce@adf.org.au.

Yours sincerely,

Dr Erin Lalor
Chair, Alcohol Change Australia

Hannah Pierce
Executive Officer, Alcohol Change Australia