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FSANZ
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SUBMISSION on P1049 Carbohydrate and sugar claims on alcoholic beverages

1. Introduction

Thank you for the opportunity to make a submission on P1049 Carbohydrate and sugar claims on alcoholic beverages. This submission is from Consumer NZ (Consumer), an independent, non-profit organisation dedicated to championing and empowering consumers in Aotearoa. Consumer provides fair, impartial and comprehensive consumer information and advice.

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2. General comments

Consumer NZ does not support FSANZ's preferred option to permit nutrition content claims about carbohydrates and sugars on alcohol products. This option does not align with healthy eating guidelines.

The New Zealand Eating & Activity Guidelines for adults states there is no safe level of alcohol and if you drink alcohol, keep your intake low.

The reasons given for the recommendations is that drinking alcohol increases:

- the risk of accidents and violence

- risk of becoming overweight or obese
- risk of cancers of the mouth, throat, larynx, oesophagus, large bowel, rectum, breast and liver
- likelihood of developing non-communicable diseases including heart disease and liver disease.

One of the recommendations to decrease the potential impacts of drinking on health in the short and long-term is for adults to drink low-alcohol or non-alcohol drinks. There are no recommendations about drinking lower-carbohydrate or lower-sugar alcoholic beverages in the guidelines.

Consumer NZ is also concerned that FSANZ's preferred option is not consistent with its position on P1059 (Energy Labelling on alcoholic beverages).

P1059 states the nutrition composition of alcoholic beverages is of minimal significance, except for alcohol and energy content. This was the rationale used by FSANZ to justify why a full nutrition information panel was not considered relevant for alcohol labels. It is unclear why the position taken by FSANZ with respect to P1049 differs.

Consumer NZ is also concerned that FSANZ's preferred option has the potential to mislead consumers about the "healthiness" of products carrying these claims.

A recent nationally representative sample of 1,000 Australian adults aged 18 years and over in August 2023, was conducted by Alcohol Change Australia. The key findings were that carbohydrate and sugar claims on alcohol products create a "health halo" and mislead Australians about the "healthiness" of alcohol.

The survey found one-third of respondents rated a product with low carb or low sugar claims as healthier than the identical product with no claim. The proportion of people who understood that alcohol is unhealthy fell from 48% to 40% when a low carb claim was added, and to 37% when a low sugar claim was added. There is also potential for low sugar claims to lead to an increase in alcohol use – one in five people reported if they saw a low sugar claim on an alcoholic drink, they would drink more of that product.

3. Preferred option

Option 3 – remove the permission in the Code to make nutrition content claims about carbohydrate on products that contain more than 1.5% ABV.

Consumer NZ strongly supports Option 3. Option 3 is the only option that protects consumers from being misled about carbohydrate and sugar claims on alcohol products. This support is consistent with the recommendations of many public health groups during the earlier targeted consultation.

Option 3 is the only option that aligns with the Policy Guideline on Food Labelling to Support Consumers to Make Informed Healthy Choices endorsed in 2020. The wider intent of the policy is to “support healthy dietary patterns recommended in the Dietary Guidelines.” Promotion of alcohol by displaying nutrition claims does not help consumers follow these guidelines.

4. Additional questions

Question 5: Do you agree with FSANZ’s current overall consideration of costs and benefits?

Consumer NZ does not agree with this consideration. The cost-benefit analysis provided only considers cost to industry of removing the current permissions. It fails to consider the burden of health and social costs associated with alcohol use.

Thank you for the opportunity to provide comment.

ENDS