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**SUBMISSION on**

**Energy Labelling of Alcoholic Beverages**

**1. Introduction**

Thank you for the opportunity to make a submission on the Energy Labelling of Alcoholic Beverages Targeted Stakeholders Consultation. This submission is from Consumer NZ, New Zealand’s leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

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**2. Overview**

Our comments on the Energy Labelling of Alcoholic Beverages Targeted Stakeholders Consultation paper provide general feedback and address questions 1, 2, 4, 5 and 7.

**3. General feedback**

Under clause 1.2.8-5 of the Foods Standards Code, standardised alcohol is exempt from the requirement to carry a nutrition information panel. In introducing requirements for nutrition information panels, the Australian and New Zealand governments made it the legal status quo to provide this information. If there is no valid reason for the exemption, alcoholic beverages should be subject to the status quo.  
  
The public submission process must ask what benefits and harms this exemption provides. Those who support the exemption should be asked to provide compelling evidence to support its retention.

**4. Questions in Energy Labelling of Alcoholic Beverages Targeted Stakeholders Consultation paper**

***Question 1.*** *Do you have any further relevant information regarding consumer opinion related to the energy labelling of alcoholic beverages? Where possible, please provide details, examples and/or evidence/references.*   
  
A 2017 Colmar Brunton survey of 1000 people, commissioned on behalf of the Brewers Association of Australia and New Zealand, found 75 per cent of New Zealanders thought nutrition information should be on alcohol bottles.[[1]](#footnote-1)

***Question 2.*** *Do you have any further information regarding any international standards, regulations, voluntary codes or schemes, or policy actions relevant to energy labelling of alcoholic beverages?*  
The European Union has given the alcohol industry a year to develop a suitable self-regulatory scheme to provide energy labelling on alcohol.   
  
BEUC, the European Consumer Organisation, reports different sectors have been unable to agree on the methods and formats to provide this information. As an example, the beer sector supports providing energy per 100ml but the spirits and wine sectors disagree.[[2]](#footnote-2) Such disagreements mean organisations involved in the process do not expect a consensus to be reached before the EU’s 12-month deadline.   
  
It is likely to be a similar story for any self-regulatory scheme in Australia and New Zealand. Different sectors of the alcohol industry are likely to prioritise an approach that puts the best interests of their businesses first, rather than the needs or best interests of consumers.

***Question 4.*** *Do you have any data, information or evidence to inform on the policy linkage between energy information, weight management and alcohol consumption?*   
  
Research into the effects of energy information on purchasing behaviour has tended to focus on food or general meal choice, rather than alcohol by itself.  
  
As an example, a Consumer NZ survey[[3]](#footnote-3) run with Choice in Australia found 63 percent of shoppers thought on-pack nutrition information (the voluntary health star rating scheme) helped them make healthier food choices (this relates to food and drink purchasing in general). Twenty percent disagreed.  
  
The only specific research Consumer NZ is aware of on energy information on alcohol products is a small experiment run by the UK’s Royal Society for Public Health, which found calorie information can impact beverage choice and calorie intake. [[4]](#footnote-4)  
  
According to the 2008/09 New Zealand Adult Nutrition Survey, alcohol contributes more than 400kJ a day to the average adult New Zealander’s energy intake.[[5]](#footnote-5) Any education campaign to advise the public about the energy intake contributed by alcohol is contingent on individuals being able to find out the accurate energy content of their chosen alcoholic beverages.   
  
Benefits from energy labelling are most likely to come from a person substituting a high-calorie alcoholic beverage for a lower-calorie option, and from choosing to reduce overall consumption. Therefore, a consistent, standardised approach allowing a customer to easily and simply compare the information on two products is important.

***Question 5.*** *What types of intervention do you consider appropriate in addressing the identified problem? Please provide details of the intervention options, costs associated with the intervention option(s), and evidence of the effectiveness of the proposed approach.*   
  
Consumer NZ believes mandatory on-bottle labelling would be the most effective intervention to educate consumers about the high kilojoule content of alcohol.   
  
The Alcohol Use in New Zealand Survey 2012/13[[6]](#footnote-6) found 96 percent of New Zealanders who had consumed alcohol in the last year had done so in their home or someone else’s home, locations where they can review bottle labels. Therefore, on-pack labelling is likely to reach the vast majority of alcohol consumers.   
  
The recent initiative of major beer brewers and distributors in New Zealand to voluntarily put nutrition information panels and information on calories per serve and sugar levels on their products shows this can easily be done.[[7]](#footnote-7)   
  
On-pack labels will allow consumers to compare products when they are making a purchase at an off-licence store. Consumer NZ believes the benefits of energy labelling initiatives are likely to come from substituting one product for another and from consumers using the information to reduce consumption overall.   
  
Researching the energy information (in potentially different formats) on the websites of different manufacturers will never be as easy or simple a task as comparing the labels of three or four bottles on a shelf, no matter the age or technological abilities of a consumer.   
  
We do not support beverages containing alcohol using the Health Star Rating system.

***Question 7.*** *What are the impacts for stakeholders that need to be considered in this policy development process? Please provide details.*   
  
Any benefits consumers will get from an energy labelling initiative are contingent on the consistency of the approach. An approach allowing some alcohol producers to display information on-pack while other companies provide this information in another format (or not at all) may result in consumers making assumptions and, therefore, uninformed purchasing decisions.  
  
Mandatory labelling requirements are needed to ensure consumers are provided with comparable information. Labelling should also stipulate where and in which format/s (kilojoules, calories, nutritional information panel for mixed drinks) energy information is provided, based on robust consultation.

Thank you for the opportunity to make a submission on the Energy Labelling of Alcoholic Beverages Targeted Stakeholders’ Consultation. If you require any further information, please do not hesitate to contact me.

Yours sincerely

Olivia Wannan

Consumer NZ

1. http://www.brewers.org.au/media-and-publications/ [↑](#footnote-ref-1)
2. Correspondence with BEUC, 1/7/17. [↑](#footnote-ref-2)
3. https://www.consumer.org.nz/articles/health-star-ratings [↑](#footnote-ref-3)
4. https://www.rsph.org.uk/our-work/campaigns/alcohol-calorie-labelling-.html [↑](#footnote-ref-4)
5. http://www.health.govt.nz/system/files/documents/publications/a-focus-on-nutrition-v2.pdf [↑](#footnote-ref-5)
6. http://www.health.govt.nz/publication/alcohol-use-2012-13-new-zealand-health-survey [↑](#footnote-ref-6)
7. http://www.brewers.org.au/media-and-publications/ [↑](#footnote-ref-7)