

Proposal P1049 Carbohydrate and sugar claims on alcoholic beverages

Response to consultation
September 2023

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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8500 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for the profession and for the people and communities it serves.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians are the qualified and credentialed food and nutrition experts and have an important role to play in sustainable food systems for population and planetary health.

This submission was prepared by Dietitians Australian staff, following the [Conflict of Interest Management Policy](#).

Summary

Dietitians Australia welcomes the opportunity to respond to proposal P1049.

Dietitians Australia strongly support, that Option 3, removal of the permission in the code to make nutrition content claims on alcohol products, is adopted.

Dietitians Australia has worked in collaboration with public health organisations such as the Cancer Council, Foundation for Alcohol Research and Evaluation, Alcohol Change Australia, the Public Health Association of Australia, and The George Institute for Global Health to consider evidence-based recommendations to reduce alcohol-related harms. The group have also considered the potential to mislead consumers about the ‘healthiness’ of alcohol products by permitting carbohydrate and sugar claims.

Dietitians Australia is concerned about the FSANZ assessment that voluntary nutrition content claims about carbohydrate and sugar content on food that contains more than 1.15% ABV will not affect the protection of public health and safety of consumers who choose to consume alcoholic beverages. The evidence presented neither supports nor opposes this assessment.

The evidence, however, is clear that all alcohol products increase the risk of chronic diseases namely, cardiovascular disease, cancer, and poor mental health, and contribute to some 5% of all Australian deaths each year,¹ regardless of their sugar or carbohydrate content. Furthermore, alcohol consumption is identified as one of the seven leading factors contributing to the health gap between Aboriginal and Torres Strait Islander people and non-Indigenous Australians.² Any marketing and promotion of alcohol products in a way that implies a product is ‘healthier’ must not be permitted, with the exception of appropriately identifying zero- or low- alcohol products.

Response to consultation questions

Question 1: Available evidence

The FSANZ consumer literature review criteria for the inclusion and exclusion of studies should be strengthened to increase the transparency and robustness of the review, by considering the following:

- An assessment of the commercial interests of each reference. This should include a review of conflict-of-interest statements, funding sources and the affiliations of authors. It is well

established that in a range of health topics, commercially funded research can influence available research, research design, conduct, and publication.³⁻⁷

- An assessment of the included grey literature. Based on the above assessment existing reports may be impacted, and for other reports, it is good practice, that the original research be sourced and referenced.
- An assessment of the inclusion criteria and review of the decision to include the Colmar Brunton Social Research references.⁸ The research question in this report is “do you think the content of this advertisement should be permitted to be displayed/shown” (page 17). This does not meet the inclusion criteria of the review.
- An assessment of the exclusion criteria and review of the decision to omit studies examining sugar and carbohydrate claims (or sugar and carbohydrate content information) specifically in relation to non-alcoholic beverages and foods. Noting the limited evidence relating to the impact of carbohydrate and sugar claims on alcohol products on consumer understanding and behaviour, there is a significant body of evidence on the impact of nutrition content claims on food labels on consumer understanding and behaviour that would inform the likely impact of carbohydrate and sugar claims on alcohol products.⁹⁻¹²

Question 2: Additional evidence

Dietitians Australia advocates for the inclusion of results from The Shape of Australia Report 2022: Claims on alcohol labels report (available from the Cancer Council). This research demonstrates that claims such as ‘no added sugar’ and ‘low carb’ lead consumers to believe certain types of alcohol are healthier than others and influence purchasing decisions.

Question 3:

Dietitians Australia does not have a position on question 3.

Question 4:

Dietitians Australia does not have a position on question 4.

Question 5:

Dietitians Australia advocates that a whole-of-society approach to costs and benefits is required, given the health, social and economic costs associated with alcohol use (an estimated 66.8 billion in 2017-18¹³) and based on 5.4.2 Subsection 18(1) – protecting public health and safety by considering the short-term and long-term risks when developing food standards.

Question 6:

Dietitians Australia advocates that health, social and economic costs should be included. For example, the estimated productivity losses due to alcohol were around \$4.0 billion (estimated range \$1.4 billion - \$6.6 billion) in 2017, with absenteeism driving 90% of these costs.¹³⁻¹⁴

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