

# P1059 Energy labelling on alcoholic beverages

**Response to consultation  
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## **Recipient**

[alcohol.labelling@foodstandards.gov.au](mailto:alcohol.labelling@foodstandards.gov.au)

## **Dietitians Australia contact**

[po1@dietitiansaustralia.org.au](mailto:po1@dietitiansaustralia.org.au)

Dietitians Australia acknowledges all traditional custodians of the lands, waters and seas that we work and live on across Australia. We pay our respect to Elders past, present and future and thank them for their continuing custodianship.

The leading voice in nutrition and dietetics

**A** PO Box 2087 Woden ACT 2606 | **T** 02 6189 1200

**E** [info@dietitiansaustralia.org.au](mailto:info@dietitiansaustralia.org.au) | **W** [dietitiansaustralia.org.au](http://dietitiansaustralia.org.au)

Dietitians Association of Australia | ABN 34 008 521 480

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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 the people and communities we serve.

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 play an important role in the prevention of chronic diseases, including those related to alcohol intake.

This submission was prepared by members of the Dietitians Australia staff in collaboration with members following the [Conflict of Interest Management Policy](#). Contributors include Dietitians Australia members with wide ranging expertise in areas including public health and chronic disease.

## Summary

Dietitians Australia welcomes the opportunity to provide a submission to the Food Standards Australian and New Zealand (FSANZ) consultation on proposal P1059 regarding energy labelling on alcohol beverages. Dietitians Australia supports the implementation of standardised, mandated, evidence-informed energy labels on alcoholic products to help support Australians to make informed dietary decisions.

Dietitians Australia strongly supports the FSANZ decisions to not permit percentage dietary intake (%DI) information in an energy statement and continues to advocate for the economic burden of alcohol-related harms (in their entirety) to be considered in the cost and benefit assessment for the proposed energy label.

## Response to consultation questions

**Questions 1.** Do you have any comments about the findings of the consumer research?

**Response:** Dietitians Australia welcomes the transparency in results provided, however notes the inclusion of using the term ‘serving size’ as a concern given there is no standard unit measure for serving size for alcoholic beverages nor is there is a safe amount of alcohol that does not affect health.<sup>1-2</sup>

The World Health Organization states: currently available evidence cannot indicate the existence of a threshold at which the carcinogenic effects of alcohol “switch on” and start to manifest in the human body. Moreover, there are no studies that would demonstrate that the potential beneficial effects of light and moderate drinking on cardiovascular diseases and type 2 diabetes outweigh the cancer risk associated with these same levels of alcohol consumption for individual consumers.<sup>3</sup>

**Question 2.** Do you have any comments on the proposed revised format for energy labelling on alcoholic beverages?

**Response:** Dietitians Australia supports FSANZ’s proposal that standardised energy labelling be introduced on all alcohol product labels on a mandatory basis.<sup>1</sup> Dietitians Australia support the label header (Energy Statement) and inclusion of a standardised reference amount (100ml).

Dietitians Australia, however, advocates for reconsideration of the inclusion of standard drinks information in the energy statement, inclusion of serving size and servings per package.

Dietitians Australia has also called for energy labels to be included on all layers of packaging.<sup>4</sup> When outer layers of multipack packaging are discarded - whether by retailers or individuals, consumers are unable to access information at point of purchase or use and therefore unable to make informed decisions. To mitigate this, energy labelling requirements should be applied to individual beverages in addition to the outer layers of packaging.

**Question 3.** Do you have any information or views about the costs and benefits associated with the revised format for the energy statement? Please provide as much evidence or reasoning as you can to support your views.

**Response:** Dietitians Australia advocates for the economic burden of alcohol-related harms, in their entirety to be considered in the cost and benefit assessment for the proposed energy label. There are over 200 health conditions that are linked to alcohol use, ranging from liver diseases, road injuries and violence, to cancers, cardiovascular diseases, suicides, tuberculosis, and HIV/AIDS.<sup>5</sup>

All of these harms as well as the disproportionate impacts on young people and vulnerable populations<sup>6</sup> should be considered in the cost and benefit assessment.

**Question 4.** Do you have any comments on the proposed approach to remove the requirement for a NIP when a nutrition content claim about energy is made?

**Response:** Dietitians Australia supports the proposed approach to remove the requirement for a NIP when a nutrition content claim about energy is made.

**Question 5.** Can you offer any information or data about the number of SKU's of alcoholic beverages currently making an energy content claim?

**Response:** N/A

**Question 6.** Do you have any comments on the proposed approach to not permit %DI information in an energy statement?

**Response:** Dietitians Australia strongly supports the proposed approach to not permit %DI information in an energy statement.<sup>4</sup>

**Question 7.** Can you offer any information or data about the number of SKU's of alcoholic beverages currently labelled with %DI information?

**Response:** N/A

**Question 8.** Do you have any comments on the proposed approach to remove the permission for the voluntary provision of a NIP on alcoholic beverages?

**Response:** Dietitians Australia supports the proposed approach to remove the permission for the voluntary provision of a NIP on alcoholic beverages.<sup>4</sup>

**Question 9.** Do you agree with FSANZ’s estimation of SKU’s of alcoholic beverages available that are currently voluntarily labelled with a NIP? Please provide as much evidence or reasoning as you can to support your views.

**Response:** N/A

**Question 10.** Do you have any additional comments on the proposal for requiring energy labelling of alcoholic beverages?

**Response:** Dietitians Australia supports the work of FSANZ and acknowledges the robust action undertaken to date on this important proposal which will benefit the health of all Australians.

## References

1. Anderson BO, Berdzuli N, Ilbawi A, Kestel D, Kluge HP, Krech R, Mikkelsen B, Neufeld M, Poznyak V, Rekve D, Slama S, Tello J, Ferreira-Borges C. Health and cancer risks associated with low levels of alcohol consumption. *Lancet Public Health*. 2023 Jan;8(1):e6-e7.
2. Burton R, Sheron N. No level of alcohol consumption improves health. *Lancet*. 2018 Sep 22;392(10152):987-988. doi: 10.1016/S0140-6736(18)31571-X.
3. World Health Organization. (2023). No level of alcohol consumption is safe for our health. World Health Organization; (<https://www.who.int/europe/news/item/04-01-2023-no-level-of-alcohol-consumption-is-safe-for-our-health>, accessed 30 November 2023).
4. Dietitians Australia. (2023). FSANZ Proposal P1059 Alcohol Energy Labelling. Dietitians Australia; (<https://dietitiansaustralia.org.au/advocacy-and-policy/submissions/fsanz-proposal-p1059-alcohol-energy-labelling>, accessed 30 November 2023).
5. World Health Organization. (2018). Global status report on alcohol and health 2018. World Health Organization; (<https://apps.who.int/iris/handle/10665/274603>, accessed 30 November 2023).
6. Australian Bureau of Statistics. (2023). Alcohol consumption 2020-21 financial year. Australian Bureau of Statistics; (<https://www.abs.gov.au/statistics/health/health-conditions-and-risks/alcohol-consumption/latest-release>, accessed 30 November 2023).