

**Alcohol  
and Drug  
Foundation**

4 September 2023

Food Standards Australia New Zealand  
PO Box 5423  
KINGSTON ACT 2604  
By email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Re: Proposal P1049 – Carbohydrate and Sugar Claims on Alcoholic Beverages

I am writing on behalf of the Alcohol and Drug Foundation (ADF) to express our support for the letter submitted by Alcohol Change Australia regarding Proposal P1049 – Carbohydrate and Sugar Claims on Alcoholic Beverages. The ADF is a national organisation that delivers evidence-based approaches to minimise alcohol and other drug harm. We recognise the power of strong and empowered communities and the important role they play in preventing problems occurring in the first place. A community-centric approach is at the heart of everything we do. We appreciate the opportunity to provide our input to this submission.

The ADF supports Alcohol Change Australia's submission and their opposition to Food Standards Australia New Zealand's (FSANZ) proposal to amend the Australia New Zealand Food Standards Code (the Code) to permit nutrient content claims related to carbohydrate and sugar on alcohol products. As an organisation dedicated to reducing alcohol-related harms in the Australian community, we are deeply concerned about the potential repercussions of allowing such claims.

Alcohol is a significant source of harm in our society, contributing to a wide range of physical, social, and economic problems. The existing data underscores this reality, with clear evidence demonstrating the extent of alcohol-related fatalities, diseases, injuries, and negative societal impacts. It is indisputable that alcohol is an inherently harmful substance, and therefore, any claims that promote nutritional value or health benefits only serve to mislead consumers.

Evidence within Alcohol Change Australia's submission demonstrates that claims regarding carbohydrate and sugar content on alcohol products have been shown to create a misleading impression of the 'healthiness' of these products. These claims are marketing tactics, rather than sources of reliable nutritional information. The evidence presented indicates that such claims can lead consumers to perceive alcoholic beverages as less harmful and lower in alcohol content than they actually are. Given the magnitude of alcohol-related harm and the urgent need to address public

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

health concerns, adopting a precautionary approach to alcohol labelling regulations becomes paramount.

We share the concern voiced by Alcohol Change Australia about the quality of evidence presented in the Consumer Literature Review and the potential for bias in the studies cited to support the proposed amendment. It is imperative that the evidence guiding regulatory decisions is independent, transparent, and free from industry influence. Given the harms of alcohol in the Australian community, the ramifications of misleading consumers with nutrition content claims are significant, and decisions on this matter should be made based on rigorous, unbiased research.

In light of the substantial evidence pointing to the misleading nature of carbohydrate and sugar claims on alcohol products, we firmly support Alcohol Change Australia's recommendation for FSANZ to proceed with Option 3. Removing the permission to make nutrition content claims about carbohydrate and sugar on alcohol products containing more than 1.15% ABV is a necessary step to protect the public from misinformation and its potential consequences.

We would like to thank FSANZ for considering our submission and for the opportunity to contribute to this important discussion. Should you require further clarification or wish to discuss our submission in more detail, please feel free to contact us.

Yours sincerely,

