

17/03/2023

## CEEV COMMENTS TO

### Food Standards Australia New Zealand (FSANZ) PROPOSAL P1059

#### Energy labelling on alcoholic beverages

#### A. FRAMEWORK

By way of introduction, CEEV - Comité Européen des Entreprises Vins ([www.ceev.eu](http://www.ceev.eu)) represents the EU wine companies in the European Union. It brings together 25 national organizations from 13 EU countries plus Switzerland, Ukraine and United Kingdom and a consortium of 4 leading companies. The companies represented by CEEV, mainly SMEs, produce and market the vast majority of quality European wines, both with and without a geographical indication, and account for over 90% of European wine exports.

CEEV thanks Food Standards Australia New Zealand (FSANZ) for the [opportunity to comment](#) on the amendment of the Australia New Zealand Food Standards Code to provide energy (kilojoule) labelling information on alcoholic beverages.

While we support the general approach of the proposal, we would like to share some comments to improve and facilitate the presentation of the information.

We strongly encourage FSANZ to continue in the efforts already made to adopt a proposal that better fits consumers and wine producers interests.

#### B. DETAILED COMMENTS

##### Presentation of the energy content per portion

For most of wine products, the portion would be 100mL, which would oblige to put two identical columns, as the regulation does not contemplate this situation.

CEEV requests FSANZ that, if the portion equals to 100ml, it will not be necessary to duplicate the same information in 2 columns.

##### The international symbol of Energy “E”

CEEV recommends FSANZ to authorize the use of the international symbol of the Energy (E) for the presentation of the energy value.

The recognition of the symbol “E” for energy declaration has already been accepted in the European Union<sup>1</sup> and is under positive consideration by the International Organisation of Vine and Wine (OIV)<sup>2</sup>.

<sup>1</sup> REGULATION (EU) 2021/2117 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 2 December 2021

<sup>2</sup> OIV PROVISIONAL DRAFT RESOLUTION ECO-DROCON 20-676 Et5

To be noted that no OIV Member State has raised concerns during the official process of consultation of draft resolutions neither during the ulterior March 2023 OIV working session where the draft resolution at stake was discussed.

**E. Introduce a new article 4.9.4**

The indication of energetic value may be presented as a numerical value followed by the units of measure. The numerical value of energy may be preceded by the international symbol "E".

Image 1: Extract of PROVISIONAL DRAFT RESOLUTION ECO-DROCON 20-676 Et5

### Graphical presentation

CEEV requests FSANZ to authorize the use of a graphical presentation for the communication of the number of portions included in a bottle.

Graphical presentation is an efficient way to communicate to consumers and, if combined with the use of the symbol "E" allows for language free communication. Language free communication is a fundamental asset to facilitate international trade.

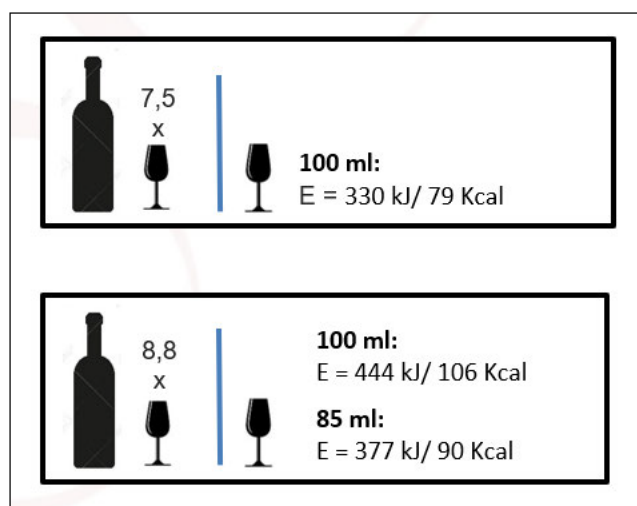


Image 2: Examples of graphical presentation for the communication of energy content