

# Food Standards Australia New Zealand Science

## Submission in response to “Proposal P1059 – Energy Labelling on alcoholic beverages”



**SOUTH AUSTRALIAN WINE INDUSTRY**  
ASSOCIATION INCORPORATED

**SUBMISSION OF:** SOUTH AUSTRALIAN WINE INDUSTRY  
ASSOCIATION INCORPORATED

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Submissions by 20 March 2023 to:  
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## **ABOUT THE SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION INCORPORATED**

The South Australian Wine Industry Association (SAWIA) is an industry employer association representing the interests of wine grape growers and wine producers throughout the state of South Australia.

SAWIA is a not-for-profit incorporated association, funded by voluntary member subscriptions, grants and fee for service activities, whose mission is to provide strong leadership, effective advice and support to South Australian grape and wine businesses to prosper and grow within a dynamic, diverse industry.

SAWIA membership represents approximately 96% of the grapes crushed in South Australia and about 40% of the land under viticulture. Each major wine region within South Australia is represented on the board governing our activities.

SAWIA has a strong track record as an industry leader and innovator in many areas. SAWIA proactively represents members and the greater wine industry with government and related agencies in a wide variety of aspects of business in the wine sector.

## **ABOUT THE SOUTH AUSTRALIAN WINE INDUSTRY**

The South Australian wine industry is worth about \$2.58 billion to the state’s economy<sup>1</sup>.

South Australia has 18 distinctly named wine regions with at least three having international recognition.

South Australia has 76,153 hectares under wine grapes<sup>2</sup>, representing about 52% of Australia’s vineyards comprising 77% red wine grape varieties and 23% white varieties.

The total wine grape crush in 2022 in South Australia was 805,851 tonnes, 46% of Australia’s crush. For South Australia, this was 6% above the 10-year average.

South Australian wine regions are responsible for producing about 590 million litres of wine – about 60% of Australia’s wine production<sup>3</sup>.

South Australia is a premium wine producer using viticultural practices leading to higher quality and lower than average yields.

In the twelve months to December 2022, South Australia exported 367 million litres for a value of \$1.32 billion (about 70% of Australia’s total value). South Australia’s major export markets are currently USA, Hong Kong, Canada, UK, Singapore and New Zealand.

Of international exports with a label claim from the regions of South Australia, about 70% are in bottled format, comprising over 90% of the value.

Wine is currently South Australia’s fourth largest single export sector. South Australian wine businesses export to about 100 countries.

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<sup>1</sup> Primary Industries Scorecard 2020-21.

<sup>2</sup> SA Winegrape Crush Survey 2022, Wine Australia

<sup>3</sup> Wine Australia, Production, Sales and Inventory Report 2020-21



In South Australia there are approximately 1,250 licensed<sup>4</sup> wine producers (including about 600 processing facilities, 340 cellar doors<sup>5</sup>) and 3,246 registered vineyard owners<sup>6</sup> who directly employ around 8,990 persons<sup>7</sup> and indirectly support another 81,900 jobs<sup>8</sup>.

Taking into account other occupations, the numbers employed in connection with the wine industry would add many thousands of job occupations.

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## 1 Introduction

The South Australian Wine Industry Association Incorporated (SAWIA) appreciates the opportunity to respond with our views on “Proposal P1059 – Energy labelling on alcoholic beverages” (the proposal) that was published on the website of Food Standards Australia New Zealand (FSANZ)<sup>9</sup>. We note that Australian Grape and Wine, the national industry representative body, has been extensively engaged in the consultation processes in developing the proposal.

SAWIA has a strong track record as an industry leader and innovator in many areas. SAWIA proactively represents members and the greater wine industry with government and related agencies in a wide variety of aspects of business in the wine sector.

Of particular relevance are SAWIA’s previous development of guidance and template documents for implementation of food safety management in wineries, and providing support to members in improving wine packaging sustainability as part of their participation in the Australian Packaging Covenant.

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<sup>4</sup> Consumer and Business Services SA

<sup>5</sup> The Australian and New Zealand Wine Industry Directory

<sup>6</sup> SA Winegrape Crush Survey 2021, Wine Australia

<sup>7</sup> Census 2021, Australian Bureau of Statistics

<sup>8</sup> Derived from Economic Contribution of the Australian Wine Sector 2019, AgEconPlus. Wine Australia [website](#)

<sup>9</sup> Proposal P1059 - Energy labelling on alcoholic beverages; accessed online at:

<https://www.foodstandards.gov.au/code/proposals/Pages/Proposal-P1059---Energy-labelling-on-alcoholic-beverages.aspx>

## 2 Overview

Broadly speaking, SAWIA concurs with the position on the proposal put forward by Australian Grape and Wine (AGW). We provide some comments on specific aspects below.

SAWIA would like to point out that this and other recent changes (i.e. Pregnancy warning) to wine labelling regulations are increasingly ‘cluttering’ wine labels with mandatory information that are not part of the label’s main intended purpose and have caused significant disruption to wine business practices in respect of label design and production costs. Hence, we encourage FSANZ to avoid considering further changes in the near future that might increase the ‘clutter’ of information on wine labels.

We note that the proposal may also require labelling of outer cartons depending on the circumstances in which they are used – for example as a retail and display pack versus a shipping carton (see Table 1 on page 30 of the proposal). Such complexity creates the potential for confusion and we encourage FSANZ to further consider the practical impacts on wine producers, especially at the smaller scale, when finalising the requirements.

## 3 Discussion

### 3.1 The proposed Nutritional Information Panel

Whilst we maintain a preference for a modern off-label digital solution, SAWIA supports the concept of using a truncated Nutritional Information Panel (NIP) for displaying energy content on wine labels. We prefer such a truncated panel to be clear, unambiguous and as small as possible, whilst maintaining compatibility with similar requirements in our major export markets, such as the EU. In respect of the example energy information panels given in the proposal, we support the suggestion made by AGW to remove the headings and serving information, and further suggest that the panel display the energy content only on the basis of a volume of 100 mL. We believe this is important in order to avoid consumer confusion that might arise by introducing a ‘serving size’ that will be different in volume to the already familiar concept of a ‘standard drink’ that is an important element in fostering responsible service and consumption of wine.

### 3.2 Calculation of energy content

SAWIA supports the concept of allowing wine producers to refer to a standard table of typical energy values for wine when calculating the energy content as this may avoid unnecessary administrative effort. We understand that this was proposed by AGW and the reference energy values were developed in consultation with the Australian Wine Research Institute (AWRI).

### 3.3 Implementation

SAWIA supports the three-year transitional arrangement proposed by FSANZ, which is consistent with Proposal P1050 – Pregnancy warning labels on alcoholic beverages. SAWIA also supports the request of AGW for an exemption for cellar-reserve and museum stock that are already packaged at the time of implementation of the changes.

In conclusion, SAWIA generally supports the current proposal for energy labelling of alcoholic beverages, but cautions against further changes in labelling requirements in the near future.

End of submission