



Submission to Proposal P1059 – Energy labelling on alcoholic beverages

A. Name and contact details:



B. For organisations, the level at which the submission was authorised

Business Owner

C. Summary

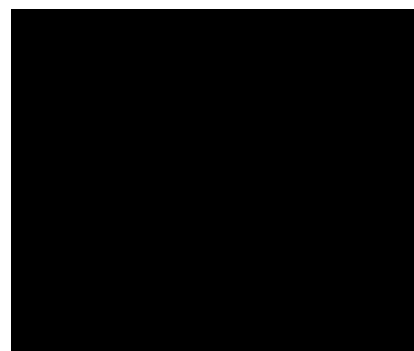
Mollydooker Wines does not agree with making energy statements on labels mandatory and supports the existing process of statements being voluntary or only required if making health statements.

We do not agree with the prescribed format for displaying energy information in an NIP table as it is not in keeping with other overseas legislations and will only create confusion on what are already overly mandated labels. We ask that consideration be taken to review the proposed format for energy labelling and re-consider a standard statement (and not a printed table) should it become mandatory.

Comments to specified sections of P1059 Call for Submissions report:

D. Format for energy labelling (Section 5.3)

We believe that providing the required energy content in a formal NIP table is unnecessary, will take up needed space on labels for other mandatories and may create confusion for the consumer.





The EU, is making energy statements mandatory by Dec 2023. They have stated that a simple “*kJ or kcal per 100 mL*” statement on labels is suitable with a NIP and list of ingredients available electronically.

The USA has clearly stated that they will be using the same simple energy statement format as they work through their legislative processes.

Using a different format may create additional costs for smaller producers who use the same back label for multiple sales markets or create the need for additional rework of labels.

As already recognised by FSANZ, alcoholic beverages do not have nutritional content and do not require anything more than a simple energy statement. By placing the data in a table with serving size information consumers are likely to become confused by the differences between serving size and standard drinks values which is mandatory on labels.

Having recently made pregnancy warning statements on labels mandatory, it suggests that the consumers have a greater need to understand the alcoholic content of products and its effects on health. By creating any confusion between alcoholic content of products and its energy content would be counterproductive to the aims of what FSANZ is wanting to do.

A simple statement of energy as suggested by EU and USA legislative bodies meets the aims and scope of what FSANZ is wanting to achieve without creating confusion for consumers or producers.

Enabling the use of electronic labels or QR codes to provide consumers with additional NIP or ingredient information would be in keeping with the developing Overseas legislations.

E. Calculation of Energy Content (Section 5.6.1)

We support the use of a simple calculation to determine average energy content.

Studies completed by AWRI and referenced by FSANZ show that a standard calculation can be used for wine products and agree that laboratory analysis should not be mandated.

