



## **Call for submissions – Proposal P1059 Energy labelling on alcoholic beverages**

---

Submission by the Queensland Mental Health Commission

Deadline for submission: 20 March 2023 at 6pm (Canberra time)

Send by email to: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

## The Queensland Mental Health Commission

The Queensland Mental Health Commission (the Commission) is an independent statutory agency established under the Queensland Mental Health Commission Act 2013, (the Act). It was established to drive ongoing reform towards a more integrated, evidence-based and recovery-oriented mental health and substance misuse system. Under the Act, the Commission must focus on systemic mental health and substance misuse issues.<sup>1</sup>

The Commission takes account of the issues affecting people who are vulnerable to or are at significant risk of developing mental ill-health, problematic alcohol and other drug use and experiences associated with suicide. The Commission works in four main ways:

- developing a whole-of-government strategic plan for improving individual and community mental health and wellbeing, suicide prevention and limiting the harm associated with problematic alcohol and other drug use
- undertaking reviews and research to inform decision making, build the evidence base, support innovation, and identify good practice
- facilitating and promoting mental health awareness, prevention and early intervention
- establishing and supporting collaborative, representative, transparent and accountable state-wide mechanisms.

The Commission promotes policies and practices aligned to the vision of *Shifting minds: Queensland Mental Health, Alcohol and Other Drugs Strategic Plan 2018-2023 (Shifting minds)* for a fair and inclusive Queensland, where all people can achieve positive mental health and wellbeing and live their lives with meaning and purpose.

### Overview

The Queensland Mental Health Commission welcomes the opportunity to make this submission. We have considered all three options presented in the proposal and confirm we support *Option 3: Require energy content information to be provided in a prescribed format*.

In exercising its functions under the Act, the Commission takes into account the reasons for Food Standards Australia New Zealand (FSANZ) preparing the proposal, which include:

- that the prevalence of obesity in Australia continues to increase; and
- that energy content information on the label of alcoholic beverages would equip consumers with the knowledge required to make better choices about their energy consumption.

The Commission relies on the evidence presented in the *National Obesity Strategy 2022-2032* regarding the link between obesity, mental wellbeing, and disordered eating which states that “Poor mental health and wellbeing can contribute to overweight and obesity... in turn, being overweight or obese and having poor nutrition can also negatively affect a person’s mental health. This includes the impacts that weight-related stigma and discrimination can have on a person’s self-esteem, mental wellbeing and feelings of inclusion.”<sup>2</sup>

---

<sup>1</sup> Section 11(2)(a) of the Queensland *Mental Health Commission Act 2013*

<sup>2</sup> *National Obesity Strategy 2022 – 2032*, p 12

Our submission will focus on responding to questions 3 and 4 as the primary questions that link with the Commission's objectives and guiding principles.

**Question 3. Do you have any views on whether the estimates we have used for the costs of overweight and obesity are appropriate? If you have alternative studies you would like us to consider please provide references to them.**

- We rely on Table 1 of PwC's 2022 study "Weighing the cost of obesity: A case for action" (referenced in Proposal P1059) which notes that it has taken a conservative approach to calculating the cost of obesity in Australia with a list of direct and indirect costs taken into account. Despite some questions about the causal link between a lack of energy labelling on alcoholic beverages and the detrimental effects of obesity, we form the view that your proposal will better equip the public to make informed decisions around energy intake. Furthermore, we see limited, unintended consequences of the proposal.
- However, we support the view that energy labelling will be ineffective without further education about energy requirements to limit excess energy intake. The Australian Dietary Guidelines<sup>3</sup> should be promoted and consumers should be equipped with information to calculate<sup>4</sup> their appropriate intake of energy.

**Question 4. Do you agree with the use of break-even analysis in this situation? If not can you provide alternative evidence about potential causal links between labelling change and potential health benefits?**

- We rely on the FSANZ estimate of Stock Keeping Units (SKUs) for packaged alcoholic beverages and their associated labelling change costs identified in Table 2 of the Proposal. However, we note there is no explanation or reference to methodology of how this estimate came to be provided (71,269 SKUs of packaged alcoholic beverages in Australia and New Zealand). The associated one-off cost of \$260 million therefore comes into question.
  - Should the estimate of SKUs be supported by referencing appropriate sources of information or methodology, we agree with the use of break-even analysis in this situation.

## Moving Forward

The Commission acknowledges the prevalence of obesity throughout Australia and the evidence supporting a link between obesity, poor nutrition, and mental health.<sup>5</sup>

Both of the Commission's strategic plans: "*Shifting Minds: Queensland Mental Health, Alcohol and Other Drugs Strategic Plan 2018 – 2023*" and "*Achieving balance: The Queensland Alcohol and Other Drugs Plan 2022 – 2027*", seek to equip consumers with the knowledge and skills

---

<sup>3</sup> [https://www.eatforhealth.gov.au/sites/default/files/2022-09/n55\\_australian\\_dietary\\_guidelines.pdf](https://www.eatforhealth.gov.au/sites/default/files/2022-09/n55_australian_dietary_guidelines.pdf)

<sup>4</sup> <https://www.eatforhealth.gov.au/nutrition-calculators/daily-energy-requirements-calculator#>

<sup>5</sup> Jacka FN, O'Neil A, Opie R, et al. A randomised controlled trial of dietary improvement for adults with major depression (the 'SMILES' trial). BMC Medicine. 2017;15(1):e23.

required to support their own mental health and wellbeing. *Focus area 2* in *Shifting Minds* proposes strategies to strengthen mental health and wellbeing by identifying problems early in order to prevent mental ill-health and problematic alcohol use. Similarly, *Priority 5* in *Achieving balance* proposes harm reduction strategies to reduce harm before behaviours or risks become problematic and impact upon health. These plans are consistent with the reasons for preparing the proposal identified in section 1.2 of the proposal.

We note alcohol campaigns in various Australian states have developed some creative ways to educate consumers about responsible alcohol consumption as well as the unintended effects of alcohol use.

In Queensland, an alcohol campaign called “Keep an eye on your drinking” seeks to educate consumers about the effects of alcohol consumption and recommends a particular number of standard drinks on any given day or week. The education provided by this alcohol campaign is aligned with Proposal P1059 and therefore the Commission recommends that you consider reaching out to Queensland Health for the purpose of collaborating your efforts with the alcohol campaign.

## Conclusion

The Proposal presents a practical approach to reducing unintended harm from alcohol consumption. Providing consumers with clear and consistent energy content information will make it possible for consumers to make better choices regarding their alcohol intake. The commission commends FSANZ on their approach to this issue which articulates the associated costs and benefits of implementation and includes targeted consultations with the alcohol industry, public health, and consumer groups. The Proposal aligns with the Commission’s harm reduction approach to policies regarding alcohol consumption.