

17 March 2023

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

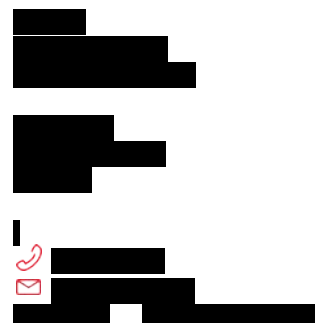
Re: Support for Alcohol Change Australia's Submission on Proposal P1059 – Energy Labelling on Alcoholic Beverages

To Food Standards Australia New Zealand,

The Alcohol and Drug Foundation (ADF) welcomes the opportunity to submit a letter in support of Alcohol Change Australia's (ACA) submission regarding Proposal P1059 on energy labelling for alcoholic beverages. We share ACA's concerns about the proposed energy label and believe that consumer testing is crucial for understanding the potential impacts of energy labelling on a range of health behaviours, including alcohol use.

We concur with ACA's recommendations:

1. Health outcomes associated with energy labels on alcoholic products must be considered holistically. Any impact of energy labelling on health behaviours must consider both the potential impact on overweight and obesity and alcohol use.
2. Energy labels on alcoholic beverages should be standardised, mandated, and evidence-informed. Mandatory labelling should be applied consistently across all products and there should not be exclusions for alcoholic products made and packaged on the premise from which it is sold (e.g., wineries, breweries, distilleries) or for alcoholic products that are delivered packaged and ready for consumption (e.g., orders delivered to consumers by a liquor retailer).
3. Serving sizes on energy labels on alcoholic products should not be determined by producers.
4. Prior to the adoption of an energy label, consumer testing should be conducted to consider the impact of energy information presented in 100mL, container size, and standard drink across a range of products on a range of health behaviours, including alcohol use.



As an organization dedicated to preventing and reducing alcohol and drug-related harm, ADF believes that it is essential to provide consumers with accurate and helpful information about the products they consume. We support ACA's stance on implementing standardised, mandated, and evidence-informed energy labels on alcoholic products to help Australians make informed dietary decisions.

We appreciate Food Standards Australia New Zealand's (FSANZ) efforts to address the issue of energy labelling on alcoholic beverages and urge you to consider ACA's recommendations, which we believe will contribute to the development of a more effective and beneficial labelling policy.

Thank you for considering our views on this important matter. If you have any questions regarding our support for ACA's submission, please feel free to contact us.

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