



8 October 2023

Email: submissions@foodstandards.gov.au

Submission to Food Standards Australia New Zealand on Proposal P1062: Defining added sugars for claims.

1. Introduction

- 1.1 DB Breweries “DB” is a wholly owned subsidiary of HEINEKEN NV, and manufactures beer, cider, and ready-to-drink products (RTDs) at facilities in Ōtāhuhu, Nelson, Paraparaumu, and Timaru.
- 1.2 As an alcoholic beverage company, we believe it is important that consumers are well-informed about alcohol, the nutritional content of our products, and how they can be enjoyed responsibly.
- 1.3 Our [global labelling policy](#) helps to ensure that consumers know what they are drinking, as well as when not to drink. We make sure to emphasise this on our packaging, in our advertising and promotions and through our partnerships.
- 1.4 We are committed to providing clear and transparent consumer information on our products: from ingredient lists and full nutritional values, to standardised recycling information, to simple symbols that show those who should not drink. As well as providing full nutritional information panel (NIP) information on all our products (whether they make claims or not) DB also provides product nutritional tables for all products on our website.
- 1.5 As part of our commitment to transparency, we will also provide further resources to consumers to learn more about the effect of alcohol on their health. We will provide this information through a QR code on all consumer facing packaging on products. The QR code will be accompanied by specific wording that indicates the QR code leads consumers to information about alcohol and health. This will be completed by January 2024.

2. Position

- 2.1 DB welcomes the opportunity to provide input into the call for submissions documents (CFS) for proposal P1062 regarding the definition of added sugars for claims. In line with our [global labelling policy](#), DB is committed to providing clear and transparent information on our products so consumers can make well-informed choices.
- 2.2 But we believe the proposed variation to Table to S4—3 dealing with "Sugar or sugars" is inconsistent with FSANZ's rationale for making the change and we are concerned about the effect it would have on beer. Using malt and malt extracts to brew beer does not constitute adding sugar. Further, dietary guidelines do not identify malt and malt extracts as concerning.
- 2.3 Malt and malt extracts are key ingredients in beer, and the sugars they may contain are consumed during fermentation. Almost all the sugar in malt and malt extracts is used during fermentation, leaving beer with significantly less sugar than a 'low sugar' claim requires (2.5 g/L or 2.5%). Any residual sugars will be oligosaccharides (DP4-10) at levels less than 1% by weight.
- 2.4 Implementing the proposed amendment could unjustifiably affect the status quo – an established regulatory status regarding 'no added sugars' labelling for beer.
- 2.5 We are similarly concerned with the proposed variation affecting other fermented beverages, including wine and fruit wine. DB believes the definition of 'added sugars' presented in the CFS will have implications beyond 'no added sugars' claims. This could affect how 'added sugars' are interpreted in future proposals related to labelling added sugars in the nutrition information panel (NIP).
- 2.6 It is vital that the definition of added sugars is applied consistently to fermented products like beer and wine, so that consumers can make informed choices. Given there are several interlinked proposals currently under consideration this is especially important. For example, if a low sugar claim were to be made on a product where the sugar from malt was fermented into alcohol but there is a requirement for malt to be called out as an added sugar based on its pre-fermentation level, consumers may be confused by the low sugar statement.
- 2.7 Essentially, DB believes that any sugar source used in the production of fermented foods should only be regarded as an "added sugar" if it has been added as an ingredient after the process of fermentation has completed and the sugar has not been consumed. Including fermented carbohydrates as "added sugars" will only make it harder for consumers to make informed choices.
- 2.8 We therefore submit that the proposed definition of 'added sugars' in the CFS is amended to specifically exclude carbohydrate sources used in the fermentation of alcoholic beverages.
- 2.9 DB supports a three-year transition period for implementing any changes that come from this proposal to comply with new claim conditions. This aligns with the transition proposed for P1049.