

Food Standards Australia New Zealand
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By email: submissions@foodstandards.gov.au

Submission to Food Standards Australia New Zealand on Proposal P1049 Carbohydrate and sugar claims on alcoholic beverages

We welcome the opportunity to provide a submission to the consultation on the Food Standards Australia New Zealand (FSANZ) proposal to clarify requirements in the Food Standards Code with respect to claims about carbohydrate and sugar content on alcohol products.

We are pleased to advise FSANZ that a piece of highly relevant research is currently under review and we will share the research with FSANZ at the earliest opportunity following the peer review process.

We conducted a survey with 497 Australian women to explore alcohol attitudes and behaviours, with a specific focus on alcohol products and marketing. The manuscript under review reports on women's attitudes towards 'better for you' alcohol products which are specifically promoted as being 'low calorie' or 'low sugar'. The findings provide further basis for concerns that such claims can contribute to a 'health halo' effect whereby the products are perceived as being healthier and less risky, and may encourage increased consumption of products believed to be healthier.

On the basis of our research and understanding of other relevant literature (e.g., Cao et al., 2023¹ and Keric, Myers & Stafford, 2022²), we support the adoption of Option 3, removal of the permission in the code to make nutrition content claims on alcohol products.

We will provide a copy of our research to FSANZ as soon as possible following peer review.

Sincerely,

[Redacted signature block]

¹ Cao, S, Tang, C, Carboon, I, Hayward, C, Capes, H, Chen, YJM, Brennan, E, Dixon, H, Wakefield, M & Haynes, A 2023, 'The health halo effect of 'low sugar' and related claims on alcoholic drinks: an online experiment with young women', *Alcohol and Alcoholism*, vol. 58, no. 1, pp. 93-9.

² Keric, D, Myers, G & Stafford, J 2022, 'Health halo or genuine product development: Are better-for-you alcohol products actually healthier?', *Health Promotion Journal of Australia*, vol. 33, no. 3, pp. 782-7.