



March 2023

Submission

Proposal P1059 – Energy Labelling on Alcoholic Beverages

Executive Summary

Spirits and Cocktails Australia and Spirits New Zealand support consumers having access to transparent information about energy and nutrition for alcohol beverages. While there are different views about the best way to convey this information at a time when consumers are using new and emerging technological platforms to become informed, we want to ensure that if alcohol beverages are to be labelled, **the format and content of energy labels is meaningful and, importantly, does not undermine messaging that promotes responsible drinking, or cause confusion for consumers about the alcohol content and number of standard drinks within a container.**

We believe the design of the energy label proposed by FSANZ, while attempting to provide meaningful energy information, confuses the message around responsible drinking and standard drinks. This is partly due to format and partly due to the duplication of some information. We are particularly concerned that having different figures for the number of serves per container versus the number of standard drinks per container will complicate information for drinkers. We are also concerned that the 100ml serving size for energy information is inappropriate for full strength spirits, where a 100ml serve could be three, four or more standard drinks, depending on the alcoholic strength of the product.

Within the timeframes allowable, we have commissioned some qualitative analysis¹ from alcohol consumers in New Zealand and Australia about the FSANZ proposed format, and contrasted it with alternative formats, to identify which may present consumers with the clearest messaging about both energy content and alcohol content. While consumers are supportive of energy labelling, they have clearly indicated they prioritise information about alcohol content and standard drinks, and express concern about any proposal for additional labelling around energy that could create confusion about monitoring their own consumption for the purpose of responsible drinking. This confusion was a core and sustained element across all focus group sessions in Australia and New Zealand. It highlights a key issue with using on-label motifs and information as a proxy for actual communication.

The research also identifies levels of confusion and misinterpretation based on both the way the proposed label is constructed as well as how some of the energy information is presented. Importantly this confusion extends to the use of a total serve per container descriptor as it sits alongside total standard drinks.

This confusion was particularly highlighted with full strength spirits.

¹ See appendix 1 for a copy of the full qualitative analysis report.

Initially, when presented with format options for energy labelling, consumers expressed a preference for the familiarity of the FSANZ-proposed formatting, including the 100ml measurement of energy. However, once information was used in practice to compare between spirits and with different categories of alcohol beverage, including beer and wine, it emerged that applying the information was more complicated than initially understood, and it resulted in some participants miscalculating the energy content for spirits. As a result, our participants switched their support to a simpler version than the FSANZ proposal.

As FSANZ has noted, consumers have a poor understanding of the energy content of alcohol; but research has also shown that they have a poor understanding of nutritional information generally. **We believe our research can assist in optimising the proposed format of the FSANZ energy label so that it can be utilised meaningfully by consumers, and so that it doesn't undermine public health objectives around sensible drinking. We have proposed alternative formats we believe meet these objectives.**

We are also prepared, should FSANZ think it would add to their understanding of the matters we raise here, to undertake quantitative research focusing on the issues the qualitative research has surfaced.

About Us

Spirits and Cocktails Australia is the peak body for the Australian spirits industry. Our vision is to promote a safe and vibrant spirits sector, which reflects Australia's mature drinking culture and creates opportunities for sustainable growth and economic development. We represent spirits producers involved in the manufacture, marketing and sale of spirits throughout Australia, from global importers to local distributors. Our supply chain stretches from 'farm to glass', incorporating farmers and primary producers and the hospitality and tourism sectors. Our industry directly supports over 52,900 jobs in spirits manufacturing, retail, wholesale and hospitality, contributing \$11.6 billion in added value to the Australian economy. Eighty per cent of what our members sell in Australia is produced in distilleries and manufacturing plants throughout the country.

Spirits New Zealand is the national trade organisation representing New Zealand's leading producers, distributors, brand owners, importers and exporters of premium spirits and spirit-based drinks. Our members are Asahi, Bacardi, Beam Suntory, Brown-Forman, Diageo, Federal Merchants, Hancocks, Lion, Moet-Hennessy and Pernod Ricard. Spirits NZ represents over 96% of spirit industry interests in New Zealand.

The Australian Distillers Association is a member-based industry body for Australian craft distillers and was founded in 2004. There are now over 350 distilleries across Australia, from Darwin to Davenport and from Margaret River to Manly – a marked increase since 2014, when Australia had just 28 distilleries. Significantly, more than 60% of these businesses are in rural and regional areas, bringing important economic benefits to these communities.

Background

Spirits New Zealand and Spirits and Cocktails Australia welcome the opportunity to comment on Food Standards Australia New Zealand's (FSANZ's) call for submissions on the proposal for energy labelling on alcoholic beverages (P1059). We thank FSANZ for providing additional time to allow us to do some initial qualitative analysis of the proposed label with consumers in Australia and New Zealand. We would like to record our appreciation at the ongoing consultation with FSANZ during the development of this proposal.

Our members support the principle that consumers are entitled to have convenient, meaningful and coherent information about foods and beverages, including alcohol beverages, to allow them to make informed choices about their diet and nutritional needs. Many of our global members already provide this information digitally for their products, and some producers in Australia and New Zealand chose to voluntarily display the traditional Nutritional Information Panel (NIP) on their labels.

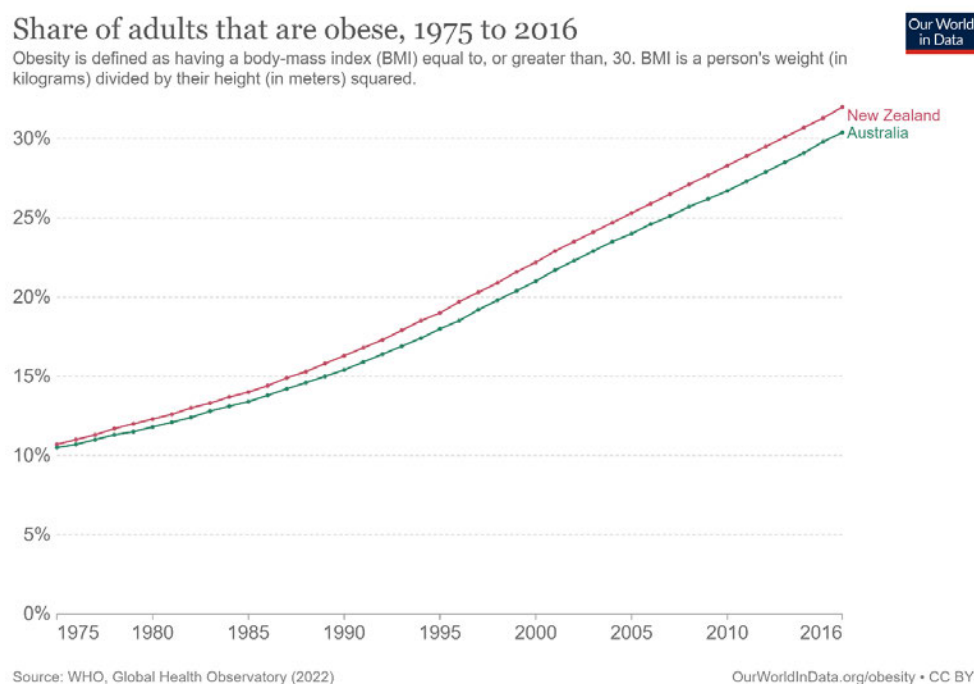
Consumer Research

In the week of 6 March 2023, the research, strategy and communications firm *Insightfully* undertook focus group testing with adults in Australia and New Zealand, to gauge views around various versions of energy labelling for alcohol beverages. We commissioned this research because we had concerns that the format of the proposed energy label might cause confusion and misunderstanding among consumers.

This qualitative analysis was limited to meet the submission deadlines of the FSANZ discussion paper; however, we are prepared to undertake further quantitative analysis based on the initial findings, to add further weight to the research. We attach the full research report as Appendix 1 for FSANZ's information.

Link between Alcohol and Obesity

The FSANZ paper noted that rates of overweight and obesity in the Australian and New Zealand populations have continued to increase in recent decades. In fact, obesity levels in Australia and New Zealand tripled between the mid 1970s and the mid 2010s, with similar increases in overweight people.

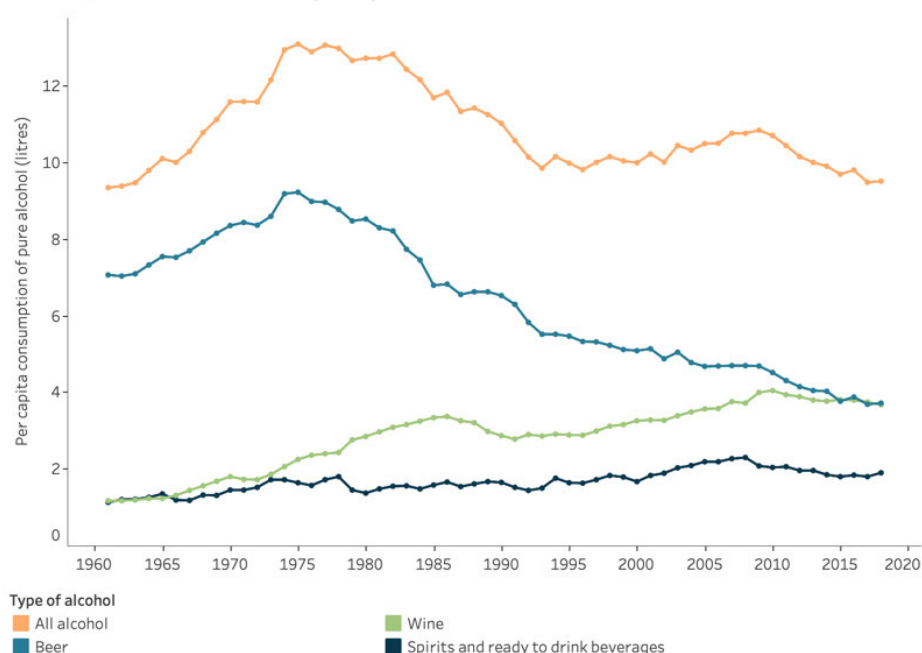


The FSANZ paper further noted that alcohol is “energy dense” and national guidelines in both countries recommended limiting alcohol to achieve “energy balance”. It noted that 80% of adults consume alcohol, and argued that on days in which alcohol is consumed, that alcohol beverages were responsible for approximately 16% of the total energy intake for that day.² This 16% figure could be a little misleading, as only 5% of adults consume alcohol daily, and only 23% of drinkers consume alcohol on three or more days weekly.

While obesity and overweight rates have increased, alcohol consumption in Australia and New Zealand has decreased over the same period. The graph below comes from the Australian Institute of Health and Wellbeing, and shows alcohol consumption peaked in 1975 with 13.1 litres of pure alcohol per capita, falling to 9.5 litres by 2018, a 27% decrease over those years.

² This figure was calculated from an ABS survey undertaken in 2011-12, where participants were asked to recall their food and beverage consumption in the previous 24 hours. The data has not been replicated to this day.

Figure ALCOHOL1: Apparent consumption of pure alcohol available for consumption, by alcohol type, year ended 30 June 1961 to 2018 (litres per capita and total volume)



This is similar to New Zealand where, based on Statistics New Zealand data, consumers are drinking 25% less alcohol per capita today than in late 1970s.

At least at a population level, it would appear difficult to confirm that alcohol beverage consumption has been a driver of increased rates of overweight and obesity, and we note that FSANZ does not argue that it has been.

Consumer Information and Understanding of Energy

The FSANZ paper noted that:

“available evidence indicates consumers generally have a poor understanding of the energy content of alcoholic beverages and do not understand alcohol is the main source of energy in most alcoholic beverages. They do however generally value energy content information on the label of alcoholic beverages.”

We believe that this poor understanding is not limited to alcohol beverages. We note that despite Nutritional Information Panels being mandatory on most foodstuffs for several decades, some public health academics believe the food labelling system “is underperforming” [<https://theconversation.com/clear-nutrition-labels-can-encourage-healthier-eating-habits-heres-how-australias-food-labelling-can-improve-200336>].

A provisionally-accepted Australian article in the Journal of Public Policy and Marketing, “Navigating through Nutrition Label Effects: A Second Order Meta Analysis” [<https://journals.sagepub.com/doi/10.1177/07439156231158115>] has noted:

Both mandated and voluntary changes to labelling efforts come at a considerable cost to society. Thus, there has been much interest in whether the benefits of nutrition labels outweigh the efforts involved in their implementation. However, researchers remain divided on the success of nutrition labelling efforts (Brambila-Macias et al. 2011). Some support the introduction of labelling schemes,

stating that these are useful in encouraging healthy food consumption (Cecchini and Warin 2016; Littlewood et al. 2016), while others argue that without adequate nutrition knowledge or the motivation to process the information, labelling efforts are ineffective (Cowburn and Stockley 2005; Sinclair et al. 2014). In some cases, nutrition labels may even backfire and encourage unhealthy food consumption (Tangari et al. 2019). To date, empirical studies provide inconsistent evidence as to the effectiveness of nutrition labelling efforts.

In their own meta analysis findings, the authors summarise:

Most fundamentally, we identify an unequivocal effect of nutrition labels on changing consumption behaviour. However we show that this effect is dependent on the aim of the intervention reported in the first-order meta-analysis and is qualified by a number of conditions. Specifically, interventions which are framed to encourage consumers to eat more of healthier food items (i.e. promotion focused aim) are, in general, more likely to influence consumers than interventions which are framed to discourage consumers from eating unhealthy food items (i.e. prevention focused aim).

These findings align with our own consumer research. Participants in our qualitative study have expressed comfort with the Nutritional Information Panels (NIPs) that appear on most food and beverages, and understand their purpose is to inform consumers and empower their ability to make choices about consumption. This is mostly perceived at an individual level rather than a population level.

Our research found the vast majority of participants supported nutritional labelling for alcohol beverages, noting that they could not identify a good reason why alcohol beverages should be excluded from labelling. Despite this, the majority of participants said they would be unlikely to use this information themselves. The main reasons for this were that:

- energy information was not used generally in their dietary choices;
- there were more important factors in their alcohol beverage choice – such as taste or alcohol content;
- alcohol beverages were seen as a treat to be enjoyed, and therefore
- health-related information was not relevant.

Many of those participants who wanted energy information because they were currently or previously dieting or counting calories, noted they already obtained this information from relevant dieting apps or websites. (We note that we have previously engaged with FSANZ on the issue of how technology and the ubiquity of smart phones and digital apps have changed the landscape for how people obtain nutrition-related information about their food and beverage choices, and that the increasing use of smart labels and QR codes means we may be seeking to use analogue solutions in a digital world.)

Despite a lack of interest in the practical application of energy labelling, and the confusion it potentially can create for consumers, our members support transparency around energy content of their products so consumers who want to, can continue to make informed decisions about their consumption and their dietary choices.

Hierarchy of Information

Information that is currently mandatory on the labels of alcohol beverages includes information of the alcohol content (ABV) provided as a percentage of alcohol within the entire beverage. The most common ABV for full strength spirits is 40%. This information is also provided in terms of the total number of standard drinks contained in the beverage. This type of information is particularly useful for “single serve” beverages like beers and pre-mixed spirits, where a person might reasonably consume the entire container in one sitting.

The importance of providing standard drink information is to ensure responsible drinking messages are consistent across different alcohol beverages in a way that is meaningful and useful. It relates to the way Australian and New Zealand Governments have been providing guidance on what may constitute harmful drinking. Although countries differ in how they measure a standard drink, it has been consistent within Australia and New Zealand for many years: 10g of ethanol, equating to approximately 12.7ml of pure alcohol.

Our consumer research has found that participants unequivocally identified ABV and the number of standard drinks per container as a significantly higher priority than energy or nutrition labelling (or other label components for that matter). As articulated by one participant in the study:

‘It’s a bad thing to change that emphasis. We’re meant to be looking at alcohol content. We’re drinking more than the calories. These health campaigns (have taught us that) I think we’re meant to look at how many standard drinks we’re having. You want to know how many standard drinks you’ve had so you can legally drive. (But) if you’re being served more than a standard drink, and if you’re counting (a serve) as a standard drink you’re going to get in trouble.’

Focus group discussions found that participants thought any label which confuses the messaging around responsible drinking and intoxication undermined the primary purpose of the label.

Proposed Label Format

Given these findings, it’s important that additional energy labelling on alcohol beverages is not presented in a way that could potentially confuse consumers about energy content within and between categories or undermine the aims around responsible drinking. Therefore, we tested different versions of the proposed energy label format with consumers.

Format A – FSANZ proposed format

ENERGY INFORMATION		
Serv ings per package: 23.3 Serv ing s ze: 30 mL		
	Quant ty per serv ng	Quant ty per 100 mL
Energy	260 kJ (62 Ca)	870 kJ (208 Ca)

Format B – Industry version one

	Quant ty per serv ng (30 mL)	Quant ty per 100mL
Energy	260 kJ (62 Ca)	870 kJ (208 Ca)

Format C – Industry version two (full strength spirits only)

	Quant ty per serv ng (30 mL)
Energy	260 kJ (62 Ca)

We have a number of concerns with Format A, the format of the label proposed by FSANZ. First, given the limited space on a beverage container, we believe it's important to relay the information that consumers find meaningful, without the need to use information that may be redundant or irrelevant for the audience. We note that information found in Format A is also found in Formats B & C, such as the fact that this information relates to energy, or the size of the recommended serving (30ml). We argue that both the servings per package (generally) and the energy information per 100ml for full strength spirits not only do not provide meaningful information, but also result in consumer confusion.

We therefore believe that Format B should be used generally for alcohol beverages (including pre-mixed spirits), and Format C should be used for spirits-based beverages that are great than 20% ABV, with a prescribed serving size of 30ml.

Servings per package v standard drinks per package

You will note that Versions B and C do not carry the “servings per package” detail. This is because we are concerned about the requirement of providing information about the total number of serves per container, when the number of standard drinks per container is already mandatory.

For full strength spirits, particularly those who do not have the standard 40% ABV, it is likely that these two figures will be different. A higher strength whisky or gin may still have a serving size of 30ml, but a much higher number of standard drinks. We tested with consumers how they interpreted having both numbers presented on label.

Feedback from participants in the qualitative testing confirmed our hypothesis that having different numbers for the standard drinks per container and servings per container resulted in confusion.



Even when respondents understood that standard drinks were based on alcohol content and serving size was a conventional pour of that type of alcohol, the ability to apply the information and potentially convert calories to standard drinks resulted in a reluctance to engage with the information at all.

When looking at the mocked label (Format A) to the left, responses from participants included:

"I'm confused. What's the difference between servings per package and the 8 standard drinks?"

'So... servings per package varies from the standard drinks...?'

'Yeah, I definitely don't understand the difference between the two (serving size and standard drinks).'

100ml serve for full strength spirits

We also have strong concerns about presenting energy information in a 100ml measurement for full strength spirits. We note that for spirits, 100ml might represent three, four or even more standard drinks in that measurement, depending on the alcoholic strength of the beverage. Given the drinking guidelines from the National Health and Medical Research Council, we believe it may cause confusion for consumers to provide energy information in this format.

The qualitative analysis found there was broad agreement among participants in both Australian and New Zealand that 30ml was the standard serving size for spirits, and that spirits were unique (contrasted with beer and wine) in that size. When shown the energy information in both 100ml and 30ml, participants expressed familiarity with the 100ml size, and said they would find it useful to compare among different spirits.

However, when utilised to compare energy information with beer and wine, there was a shift. When considering this 100ml measure of energy, there was evidence that about one in four respondents would misinterpret the information, resulting in the consumption of more calories than anticipated. This misinterpretation occurred when respondents were asked to compare the energy intake from one drink of spirits to another alcohol beverage.

Participants looked at the 100ml of spirits, wine and beer, noting the energy content, and thought spirits had the highest number of calories. They misunderstood that the size of typical serves for different drinks were substantially different, and therefore miscalculated their actual calorie consumption.

Additionally, some respondents also indicated the inclusion of the energy information per 100ml indicated to them that 100ml was a suitable serving size.

After thinking through and describing the steps they would use in real life to make comparisons within and across alcohol categories, these spirits drinkers eventually dismissed the idea that they would use the 100ml information to compare beverages.

Instead, respondents quickly shifted to using the *per serve* energy information as their point of comparison, particularly when comparing across drinks categories.

Ultimately, after considering all the options, respondents preferred Format C - the label that contained only energy information relating to Serving size (30ml) - as this was the information that would be used most effectively. Reducing the amount of information provided on labels to the most important and utilised components aids in reducing the 'noise' and cognitive loads for the consumer, increasing the likelihood that the information will be processed and shifted to long-term memory.

Please refer to Appendix 1 for further details in the research.

Energy claims and the full Nutritional Information Panel

The FSANZ paper clearly states that:

The current requirement to label beverages containing alcohol with a NIP if a nutrition content or health claim is made would remain in place.

Our question is should a producer simply want to make an energy claim (e.g. “Only 68 calories per can”) would this require the full Nutritional Information Panel?

Our view is that if the nutrition or health claim is limited to energy, there is no reason why the energy information panel should not suffice to be provided, instead of the full NIP.

Alignment with other FSANZ proposals

In the FSANZ paper, it was noted that there were two additional proposals currently in progress that are related to this proposal: P1049 – Carbohydrate and Sugar Claims on Alcoholic Beverages; and P1058 – Nutrition Labelling about Added Sugars. FSANZ has noted that for P1049:

If P1049 results in changes to the permissions for carbohydrate and/or sugar claims about alcoholic beverages, the labels (and advertising) of some alcoholic beverages may need to be changed. Consequently, this proposal is being progressed in tandem with P1059 to minimise the potential impact on industry of having to make multiple label changes and to consider the implication of any label changes on consumers ability to make informed choices.

It also noted for P1058:

Reviewing existing exemptions for a NIP, including that for alcoholic beverages, is out of scope of P1058. However any changes to labelling requirements for added sugars may apply to alcoholic beverages.

Meaning that for alcohol beverages that continue to use the full NIP after the implementation of energy labelling, changes may be required to amend labels with respect to added sugars, which could affect pre-mixed spirits beverages and liqueurs.

It is our view that the implementation period for labelling changes for all three proposals should be aligned, to minimise the cost to businesses.

We also note that individual Australian states and territories are also considering changes with respect to beverage containers that are within scope of their respective container deposit schemes. Full strength spirits bottles are currently being considered for inclusion in schemes in several states, and if so included, would require label changes to note that these bottles are eligible for refund under the various state and territory schemes. Ideally, the timing of these label changes would also align to the FSANZ labelling changes, to sure cost-efficiency for businesses.

We would further argue that given these proposed changes, on top of the recent change to include a revised format for the pregnancy-related messaging and logo, has imposed significant cost and disruption for business, including the large number of new and emerging distillers across both countries, there should be a moratorium on further label changes for a period of at least 10 years.

Conclusion

While consumers should have a right to access information which helps them make informed decisions about their nutritional needs, how do we determine that this proposal has led to benefits when it comes to addressing increased rates of overweight and obesity in Australia and New Zealand? Members of our associations would note there is no proposed indicator of how it might be assessed that this labelling change, should it be implemented, would be considered successful. FSANZ noted the lack of evidence around the effectiveness of nutritional information labelling on behavioural change, and our research confirms that while consumers want this information, it is unlikely to be used in any meaningful way.

We note in March 2023, the Australian Department of Prime Minister and Cabinet released an “Australian Government Guide to Policy Impact Analysis”, which includes seven impact analysis questions. The last of these questions was “How will you evaluate your chosen option against the success metrics?” This has not been addressed in the FSANZ discussion paper.

The relationship between overweight and obesity and individual categories of foods or ingredients in foods is complex, and how consumers obtain, understand and utilise information evolves with technology, opportunity and education. We are concerned, from a global perspective, that on-label information is seen as a solution to information or behaviour-related consumer issues. This is simply not the case and, as our research for this submission shows, although the intention is sound, the outcome of trying to convey complex sets of overlapping information is more likely to be confusion or, worse still, unintended behaviours such as the promotion of excessive consumption.

As we stated when responding to the pregnancy warning label consultations and as acknowledged by officials during this process, unless accompanied by a broader consumer campaign highlighting the key issues to be addressed, the impact of on-label information will be negligible. And no matter how much labelling initiatives are aligned the changes sought will come at significant cost to business and, in particular, smaller operators.

We urge FSANZ to consider this need as part of its deliberation on all labelling matters.

With specific regard to energy labelling we have made it clear that our concerns are three-fold –

1. The proposed FSANZ label is unnecessarily too large and needs to be simplified.
2. The use of the 100ml option as a “standard” comparison to help the consumer does the opposite, for full strength spirits.
3. The use of the number of serves per container along with number of standard drinks causes unnecessary confusion with the consumer giving hierarchical preference to standard drinks (and ABV) over any other measure.

We therefore ask that FSANZ consider changing its preferred option to our proposed version B for all categories of alcohol except full strength spirits of 20% ABV and above. In this case we ask FSANZ to adopt our version C for use on these products.

For more information on this submission, please contact



STRATEGIC MEMORANDUM	
To:	Jonathan Chew, Spirits & Cocktails Australia Robert Brewer, Spirits New Zealand
From:	Leanne White
Subject:	Spirits Energy Labelling Focus Groups
Date:	15 March 2023

Background, Objective & Summary Methodology

As Spirits & Cocktails Australia and Spirits New Zealand prepare to respond to Food Standards Australia & New Zealand's proposal for energy labelling on alcohol beverages including spirits, they need a detailed understanding of how Australian and New Zealand spirits consumers' interpret energy information on variations of package labels, including in comparison to other alcohol beverages.

The aim of this qualitative research is to understand how energy information is most effectively used by consumers of alcohol beverages, specifically in spirits. The study takes into account the difference between spirits and other alcohol beverages and the impact of including the 100ml energy information. It also considers the impact of how various options for displaying energy information affect responsible and safe consumption choices. The discussion guide used in the focus groups is included at Appendix A.

Four focus groups were held on 6 and 7 March 2023 among adult spirits consumers in both Australia and New Zealand. The 2-hour focus groups had approximately 8-10 respondents in each group. Respondents were Consumers who had purchased or used a large bottle of spirits in the past month, and who had also consumed beer or wine from a bottle/can in the past month. Respondents were otherwise generally representative of the local population by age, gender and socio-economic background.

The full recruitment specification and screening document is included at Appendix B, and an outline of all respondent demographic information is included at Appendix C.

Appendix D outlines the research methodology of this study in the context of FSANZ's Revised Quality Assessment Tool for Studies with Diverse Designs (QATSDD).

Qualitative Research

Qualitative research is intended to explore why respondents are thinking and feeling the way they do about our subject of interest, and to understand the effect of various communications messages and visual tools on people's opinions and behaviours. Because it is, by its nature, relatively small sample, qualitative research is not intended to quantify the marketplace, or to provide reliable projections of shifts in market/consumer behaviour. The focus on a particular topic in the report does not necessarily reflect the level of awareness/understanding of that particular topic among the population at large. These findings are based on a combination of spontaneous responses and responses to stimuli provided by the client for these focus groups.



Findings

General Understanding of Nutritional Information Panel (NIP)

When considering the 'general' NIP found on food and non-alcohol beverages, spirits consumers broadly understand the NIP's purpose as a mechanism to assist them in understanding the amount of nutrients contained in products and empower them to make informed decisions about their consumption. More than half of respondents say they have referred to NIP information on food and non-alcohol beverages. On 'general' NIPs, spirits drinkers look for calorie, carbohydrate, sugar, protein, and fat content to inform their choices about food and drink.

'(I look for) mainly the sugar and the fat content. If it can be below 10, you get it in the healthy range. Is it below 10 or 5 for either one? The other thing you should look at is sodium.'

There are mixed feelings about the need and motivation for the inclusion of the general NIP on food and non-alcohol beverages. Some respondents believe that producers have a 'duty of care' to provide this information to consumers and that the ultimate aim is to improve health outcomes.

Less than half the spirits drinkers in the focus groups made the link between the provision of Nutritional Information and attempts by public health authorities to reduce obesity.

However, there is also a level of cynicism or scepticism about the effectiveness of any label elements that contain warnings or nutritional information, with at least a couple of participants per group stating their belief that NIPs are a 'box ticking' exercise to meet government legislation, without meaningful content or implications for the consumer.

*'Why are we focused on calories? It's about responsible and sensible eating.
Everyone needs calories to eat. It's become this symbol of weight.'
'I don't look at the labels when I go shopping. It already takes a lot of time to go shopping.'*

Some respondents say the information on a 'general' NIP is confusing to them:

'It should be easier to understand. The purpose of a nutritional breakdown so a consumer can make sense of it. I would guess eight times out of 10 you look at it and not know what one of the products is which makes you feel like it's pointless.'

Nutritional Information Panel (NIP) on Alcohol

Respondents were exposed to various mock designs of alcohol labels containing a variety of NIPs. The designs varied in format and content and images of the variations are shown throughout this report.

The focus group respondents were taken through a series of scenarios and questions (per the Discussion Guide) to pinpoint:

- the information that is of most importance to them as alcohol consumers,
- the information they would or wouldn't use on labels,
- what they would use the information for and in what settings and,
- finally, how they interpret and will apply the information.

Current Spirits Labels

Respondents were asked to consider spirits labels in the context of large bottles of straight spirits and were shown the following images as examples.



Most respondents say they rarely, if ever, look at the back of a spirits bottle unless the information they are seeking is not clearly displayed on the front. Most say there are two pieces of information on alcohol packages that are most relevant to them:

- the percentage of alcohol contained in the drink and
- the number of standard drinks contained in the package.

The former is usually on the front of the bottle, and the latter may be on the back of the bottle and is the information sought by those who do refer to the back.

Respondents were exposed to a label from the back of an alcohol beverage containing typical elements currently they might currently find on a label (see Figure 1). The purpose of these elements is understood by respondents to include such factors as:

- Warning consumers of the risks of consuming alcohol
- Deterring women from drinking alcohol during pregnancy
- Promoting responsible drinking
- Meeting manufacturers' legal obligations
- Providing easy access to Standard Drinks information
- Manufacturers covering themselves against liability
- Increasing recycling
- Educating consumers



Figure 1: White Spirits Vodka Label

These spirits drinkers are all aware of the concept of the standard drink. All of them place positive value on the Standard Drinks icon being included – and being highly visible – on the packaging of all alcohol beverages. The Standard Drinks information is often sought to assist consumers in managing their alcohol intake and by extension, their blood alcohol content when planning to drive. About half of respondents said they use the Standard Drinks and percentage of alcohol information when making their alcohol choices. The younger (18-30 years) cohort often use this information for comparative purposes to obtain the product with the highest alcohol content or most standard drinks per bottle, ensuring *'best bang for buck'* or to *'get a buzz'*.

The majority agree the pregnancy warning is important. However, there are consumers who feel this information is already widely known and obvious. They feel the pregnancy warning is therefore redundant.

'It's useless in the fact most of us have learnt this stuff before we started drinking, such as drink smart and pregnancy, we know everything by the time it gets to drinking.'

Respondents are familiar with the DrinkWise, DrinkIQ and Cheers logos. However, only one, a younger spirits drinker, has taken the next step to access the websites for the information they contain.

'It's compliance for compliance sake. I treat them all with some contempt. The effects of alcohol are pretty well documented and a lot of this stuff to me is useless information. The real problem is as we all know, the dangers of alcohol. The do-gooders put these sorts of things (warnings) on here.'

When asked whether there was any other information they would specifically use if it were on the back of bottles, these spirits drinkers say they are unlikely to look at the back of the bottle and that the number of warnings currently included has them *'skimming over'* the label if they do look at it. This is evidenced when respondents become cognisant of standard warnings and logos on labels to which they have been frequently exposed.

This skimming of information is consistent with Cognitive Load Theory (Sweller, 1988) which suggests that there are limits to the amount of information a person can process at any one time and should this limit be reached the mind begins to filter out the seemingly already known, non-relevant or lower priority information.

A small number of respondents spontaneously said they would also like to see information on back alcohol labels such as:

- the alcohol percentage,
- mental health warnings,
- allergens,
- ingredients and
- manufacturer details.

Labelling on large-volume (>700ml) packaging of spirits



Figure 2: Brown Spirits Rum Label V1



Figure 3: Brown Spirits Rum Label V2



Figure 4: High Strength Spirits



Figure 5: Brown Spirits Rum Label V3

Prior to exposure to mock designs which included nutrition information in various formats, the majority of respondents say they are unlikely to use the NIP on an alcohol package label, regardless of its exact format/layout. The spontaneous reasons for not using this nutritional information include:

- Disinterest in knowing the calories in alcohol,
- Would not impact drink choice or behaviour,
- Drinking is seen as a treat, to be enjoyed and therefore calories are irrelevant.

Most spirit drinkers who use energy information to monitor their diet and energy intake already have obtained energy information for alcohol from other sources and therefore say including energy information on the label is irrelevant to them. Existing sources for this kind of information include calorie counting apps or the internet.

All respondents agree that the quantity of energy in an alcohol beverage would not have a significant impact on their choice of drink. Their preferences are strongly driven by alcohol content and personal taste. The few respondents who are likely to use a NIP say they are more likely to do so when drinking at home rather than on licensed premises.

Respondents were then exposed to mock labels including variations of NIPs as displayed in Figures 2, 3, 4 and 5. They were asked to identify and explain the new information on all of these labels.

The customer enquiries, Australian-made and energy information on these labels are easily identified when asked to attend to this task. In relation to the NIPs presented, respondents identify the main pieces of information being communicated as: the serving size, energy per 100ml and the number of serves per package.

Thoughts and opinions specifically in relation to the energy information table were garnered next from the respondents.

About half of the spirits drinkers participating in the study were pleasantly surprised by the low number of calories contained in alcohol and indicated that this might impact their alcohol consumption.

*‘Knowing that my daily calorie limit is about 2400,
I may well drink 500 calories with dinner’.*

Energy per Quantity - 100 ml and 30ml

When given the time to explore the content of the NIP variations participants discussed the various features and their uses. Much emphasis was placed on the serving per package and the energy quantity per 100ml, likely because this is new information for many.

There is broad agreement among respondents and across Australian and New Zealand groups that 30ml is a standard measure or serving size for spirits, and that spirits are unique as the only alcohol beverage that has such a standard serving size.

Initially when provided with the NIP information on spirits packages only, respondents said they would use energy information on alcohol labels in the same way they would use it on food packaging. That is: to compare the quantity of energy both within and across alcohol categories.

'I think 100ml is quite good because you can compare between bottles.'

'The 100ml is a frame of reference for something non-alcoholic.'

Respondents were provided Figures 6, 7 & 8 to compare the energy information of wine and beer against spirits. The beer and wine labels with mock-up energy information were also explored with these focus group respondents because spirits drinkers often also drink beer and wine.

When considering this 100ml measure of energy, there is evidence that about one in four respondents would misinterpret the information, resulting in the consumption of more calories than anticipated.

This misinterpretation occurs when respondents are asked to compare the energy intake from one drink of spirits to another alcohol beverage.

The unprompted process undertaken and verbalised by a Queensland respondent demonstrates this. She took the energy quantity per 100ml from the beer label and compared this with the energy quantity per 100ml from the rum label.



Figure 6: Red Wine (Aust) Shiraz Label



Figure 7: Red Wine (NZ) Malbec



Figure 8: Beer (Aust.) Larger Label

Having equal taste preference for beer and rum she concluded that she would drink the beer as she thought it contained fewer calories.

Beer	Rum
Quantity per 100 mL	Quantity per 100 mL
159 kJ (38 Cal)	845 kJ (202 Cal)

The reality of this comparison is that due to the serving sizes of beer and spirits being significantly different, this respondent would have consumed 142 calories as opposed to the 38 calories (if consumed neat) she misunderstood that she would be consuming. In this case, the respondent would consume 373% more calories than planned.

Beer	Rum
Quantity per serving	Quantity per serving
594 kJ (142 Cal)	254 kJ (61 Cal)

Some respondents also indicated the inclusion of the energy information per 100ml indicated to them that 100ml was a suitable serving size.

'I probably wouldn't look at the glass and say that's 100ml you know. I'd just look at the glass. If I'm in a good mood I'd have 100ml. But I wouldn't actually measure it. I seriously don't.'

'I think it [the 100ml information] does [suggest it's a serving size or a reasonable amount]. There's some people who like spirits. 250ml is a full glass isn't it. So, you're looking at just under half a glass. So, yeah, 100ml for some people that may be an actual good size for them.'

After thinking through and describing the steps they would use in real life to make comparisons within and across alcohol categories, these spirits drinkers eventually dismissed the idea that they would use the 100ml information to compare beverages.

Instead, respondents quickly shifted to using the serving size energy information as their point of comparison, particularly when comparing across drinks categories. The process of trying to compare across different serving sizes and multiplying / dividing volumes to reach an equivalent number complicates and confuses consumers to the point that they abandon the task.

'It would take far too long to sit there and nit-pick about all the calorie information'.

As demonstrated above, it was also acknowledged that if they did reach a conclusion the resulting figure may not be representative of actual calorie intake i.e. spirit drinkers will be consuming less or more than 100ml depending on the drink they are making.

Respondents in New Zealand are more likely to use 100ml information in making their choice when comparing products in the same category, i.e. spirits to spirits, beer to beer, and wine to wine.

Respondents suggest further uses for the 100ml might be if they are making large quantities such as punch or cocktails, or if they are planning to specifically consume 100mls of spirits. All respondents from the Australian focus group ultimately indicated that they would not use the 100ml Energy Quantity information on the labels.

Despite saying they would not actually use this energy information, they did indicate a preference for the label with the 100ml information due to the comfort of familiarity with labelling for food and non-alcohol beverages.

Standard Drinks and Serving Sizes

Respondents experience considerable confusion when attempting to identify the difference between standard drinks and serving sizes on the same packaging label. There is a majority consensus in relation to spirits that the conventional serving size is 30ml, but how this relates to standard drinks is unclear in the minds of most respondents. See Figure 2 and 7 again, at right, as an example. In Figure 2, the inclusion of the number of servings (23.3) and serving size (30ml) on the label, particularly when the Standard Drinks icon is also prominent (20 approx.), triggers these confusions.

A similar confusion arises from viewing Figure 7 which as 5 servings per package but 8.0 standard drinks.

I'm confused. What's the different between servings per package and the 8 standard drinks?

Even when respondents understand that standard drinks are based on alcohol content and serving size is a conventional pour of that type of alcohol, the ability to apply the information and convert calories to standard drinks results in a reluctance to engage with the information at all.

'So... servings per package varies from the standard drinks...?'

'Yeah, I definitely don't understand the difference between the two (serving size and standard drinks).'



Figure 2: Brown Spirits Rum Label V1



Figure 7: Red Wine (NZ) Malbec Label

'It's looking too complex. Most people would not do the maths. It's about making a bit more of a choice without going into too much detail.'

The few respondents who were counting or watching their calories said the inclusion of the Standard Drink measure (30ml) would make them more likely to use a precise measurement of millilitres when pouring their spirits to ensure that their tally of calories is accurate.

Preference versus Comprehension and Usage

While the majority acknowledged that the inclusion of the quantity of energy contained in 100ml of the product was unlikely to be useful – and may even be confusing – many said it remained their preference as the table looked more balanced and gave more information.

Respondent preference for the energy labels containing energy quantity per 100ml can be explained by the mere-exposure effect (i.e. Familiarity Bias). This is a person's tendency to develop preferences for things that are familiar or known, despite the familiar not always being the best option (Bornstein, 2004) (Zajonc, 2001).

'This is more useful for me [Figures 4 & 5], just the per serving information. The other one [100ml] is pleasing to the eye because we are used to it.'

For similar reasons of familiarity bias respondents questioned why more information was not included in the NIP, namely sugars and carbohydrates. They are used to seeing a NIP with this information along with microelements such as sodium, magnesium, etc.

The interest in seeing sugar and carbohydrate information is driven by a notable misconception that spirits contain large amounts of sugar. For spirits drinkers, sugar content is a consideration in drink selection. Prior to understanding that most of the microelements on a standard NIP, such as sugar and sodium, are absent (or nearly absent) from spirits, respondents preferred the full NIP. Once they understood that spirits do not include all these nutritional elements, the simpler NIP that displays energy only is preferred. A minority would still like to see the full NIP on alcohol packaging as they feel this might inform drinkers of spirits' low sugar and carbohydrate content.



Figure 4: High Strength Spirits Scotch



Figure 5: Brown Spirits Rum Label V3

Stated label preference (what consumers say they like) is also motivated by aesthetics rather than information content. This being the case, the majority of spirits drinkers initially prefer the three-row by-three-column presentation of Energy Information (Figures 2, 6, 7 & 8) and at right.

The most appealing element of these tables is the top row containing:

- the title ('ENERGY INFORMATION'),
- the servings per package and
- the serving size.

ENERGY INFORMATION		
Servings per package: 23.3		
Serving size: 30 mL		
	Quantity per serving	Quantity per 100 mL
Energy	276 kJ (66 Cal)	920 kJ (220Cal)

The table is more aesthetically balanced and visually appealing to the majority of spirits drinkers when compared to others. This is despite the confusion created by the inclusion of the number of serves per package against standard drinks.

As respondents further explored the process of obtaining the actual information they desire, many said that the more information that was shown, the more confused they became. Subsequently, they said they would be less likely to use this information at all.

'To be honest I'd never use it. I'd just go and buy and bottle of rum and just drink it. I don't care how many calories I get out of it. I just enjoy it. I won't read this information.'

After the presentation of the energy information variations and discussion, spirits drinkers' have hierarchy of information needs on labels is as follows:

- 1) Alcohol percentage
- 2) Standard Drinks option
- 3) Calorie information

Ultimately, after considering all the options, respondents prefer the NIP that contained only energy information relating to Serving size (30ml) as this was the information that would be used most effectively. Reducing the amount of information provided on labels to the most important and used pieces aids in reducing the 'noise' and cognitive loads for the consumer, increasing the likelihood that the information will be processed and shifted to long-term memory.

When comparing the content of labels, spirits drinkers will primarily use the two-row by two-column NIP, at right. This provides the clearest, most understandable combination of elements when aesthetics and familiarity are removed from the equation.

Quantity per serving (30mL)	
Energy	254 kJ (61 Cal)

Some respondents were able to articulate why the groups' preference shifted from preferring the three-row-by-three-column presentation, with the 100ml information, to the two-row by two-column presentation, without the 100ml information. They said that overall, they were concerned the three-row-by-three-column information because it was confusing and took the focus off standard drinks.

'It's a bad thing to change that emphasis. We're meant to be looking at alcohol content. We're drinking more than the calories. These health campaigns (have taught us that) I think we're meant to look at how

many standard drinks we're having. You want to know how many standard drinks you've had so you can legally drive. (But) if you're being served more than a standard drink, and if you're counting (a serve) as a standard drink you're going to get in trouble.'

Any label that confuses or takes the emphasis away from the primary message of safe and responsible drinking undermines the primary purpose of mandatory label information.

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Appendix A

Focus Group Moderator Guide

R20230215 SCA-SNZ – Energy Labelling Moderator Guide

Group Specs:

- Timing each: 120 minutes
- Location: Brisbane Qld & Auckland NZ
- Local adults (i.e. >18 years old)
- Consumers who have **purchased or used** a large bottle of spirits in the past month
- And who have also consumed beer or wine from a bottle/can in the past month
- Otherwise mix of age, gender and location
- Participants from industries and occupations with a particular interest in food labelling, calorie intake or nutrition were excluded from the focus groups. Examples might include 'Food Standards Aust NZ' or 'Dietitian' or 'Weight Loss Consultant' or 'Health Promotion Officer' or 'Food & Beverage Sales or Rep'.
- Each group 8-10 participants

Research Objective:

- This qualitative research will help understand Australian and New Zealand spirits consumers' interpretation of energy information on variations of package labels, including in comparison to other alcohol beverages.

Indicative Intro (5-10 mins)

- Hello and welcome everyone. My name's [NAME]. I'm an independent market researcher. When companies or organisations want to find out what people think they come to a person like me. I come out to a group of people like you to find out what you think and report back.
- I'm not trying to sell you anything or get you to change your minds about anything; this is simply a research exercise. I want to understand your **OPINIONS** about the things we are going to be talking about.
- If you haven't been to one of these focus groups before, I like to think of it as an informal chat. I'm looking for your opinions about the things we'll talk about tonight. Hopefully we'll have a range of opinions this evening so please feel free to tell me what you really think. And likewise, let everyone else put forward their opinion. You can let me know if you agree or disagree. I'm really just looking for your honest views.
- Be assured that your personal details will remain confidential – so use **FIRST NAMES ONLY**, and please keep the content of tonight's discussion confidential after we finish.
- We have a lot to get through this evening so apologies in advance if I cut you off. It is not a reflection on you or your input, it will be that we need to move forward or that I have enough information on that topic.
- I will be recording this discussion so I don't have to be noting everything down, and my colleagues and client may be watching via Teams. Or they may listen live or watch back later. As long as everyone is comfortable with that,

we'll proceed. If you're not comfortable with that, that's fine, now is the time to let me know. GET CONSENSUS
[IF NOT COMFORTABLE DISMISS WITH INCENTIVE]

- I now ask that you all turn your phones completely off, not just on silent. This is to both avoid distractions and also to assure the client that the session and material were not recorded.
- IF ASKED CLIENT: I won't say who it is now, because I don't want your views to be coloured by that. But if you still want to know please ask me at the end of the focus group.

RECORD

OK, let's start off with quick introductions. Please tell everyone your FIRST NAME ONLY, where you live and who's in your household.

Label Testing 1: (25 mins of 35 mins)

2. A2 GETTING IN THE MINDSET POSTERS A, B & C:

So tonight our topic is about **labelling on alcohol beverages packaging**. Let's start off by showing you some actual labels on containers for you to have a look at (PUT UP A2 BOARDS).

- Just imagine you're in the shop picking up a bottle of spirits or you're at home or at a friend's pouring a drink. These large images are just to get you in the mindset of picking up that bottle.
- [A4 'STATUS QUO'] HANDOUT 1
- Take a look at these quietly for a moment and then I'll ask a few questions:
 - i. Do you ever look at the back label? HANDS UP IF YOU DO / DON'T
 1. What do you look for on the back?
 - ii. INTERPRETATION: Looking now at what's on this back label here, what's the main information it's trying to get across? How do you interpret this / what do you think it means?
 - iii. PURPOSE: What is the purpose of [EACH ELEMENT] on the label? Why is this on the label?
 - iv. EFFECTIVENESS FOR EACH ELEMENT: And does it effectively serve that purpose? Why / why not?

GAPS: Is there anything missing from these labels? Is there any info you would LIKE to see on here? What? Why? What else? Why? How would that improve the usability of these labels?

2. CURRENT NIP Usage:

- a. On food and non-alcohol drinks there is always a 'Nutritional Information Panel'. Do you know what that is? Who can describe it for me?

HANDS / RECORD: Hands up if you currently use the Nutritional Information Panel on food and beverages?

- What information are you hoping to get from the labels? What outcome are you hoping to achieve, or how do you use that information? PROMPT IF NECESSARY: Do you look for salt, fat, overall calories/kilojoules, or sugars? And why?
- And those who do NOT use the nutritional information panel why don't you use that information?

Label Testing 2: (20 mins of 55 mins)

Now let's go back to talking about alcohol package labels— particularly those large bottles of spirits (like the bottles in the pictures up on the wall)

4. A4 INDUSTRY VERSIONS HANDOUT 2, 3 & 4 [2&3 combined and presented on one paper. 4 presented alone. ROTATE Versions a, b & c of each among the groups.]

- a. We're going to look at a few different variations and get your thoughts. The information varies very slightly each time, so you're going to have to have your thinking caps on. And we are still talking about labels on large bottles of spirits here. Spend a moment taking the information in. Then I'll ask some questions and get your responses.

FOR EACH

- i. INFORMATION: What's the new information on this label / these labels? Describe it to me [FOR COMBINED C/D: Describe the left one to me. Now the right]. What else is new? What else? PROMPT IF NECESSARY: (depending on label) Number of servings. Serving size. Number of kJ/Cal. kJ / Cal per serving. kJ / Cal per 100ml.
- ii. First – what do you think of this new information? Do you like it, not like it, find it helpful, not find it helpful, what? Is any of this important to you? What is MOST important? Why? Someone else: MOST important to you? Why? Anyone else find something MOST important?
- iii. INTENT / PURPOSE [FOR BOTH 30ML AND 100ML VERSIONS]: Why is the energy information panel on here? What's the purpose? Who do you think wants it on there? What are they trying to achieve? What is the purpose of the information on these labels? [FOR 100ML VERSIONS ONLY:] What is the reason for including the 100ml measure? Why do you think it is included?
- iv. LIKELY USAGE: Would you use the 30ml information? HANDS UP / RECORD Why? Why not? [FOR THE 100ML VERSIONS:] And would you use the 100ml information? HANDS UP / RECORD Why use it? Why not use it?
- v. CLARITY [FOR ALL VERSIONS]: HANDS UP / RECORD On balance, would you say it's EASY or HARD to work out the information you would like to know? [IF NEEDED: Pick either EASY or HARD even if it's just a slight leaning] Why easy? Why hard?

FOR 100ML VERSIONS ONLY: PROMPT: Is there any other information you are referring to when trying to work this out? Are you considering other information that is not on the label? How are you referring to it? Would the energy information on this label affect how much or what you chose to drink? HANDS UP YES/NO How? Question for everyone, does this energy information give the impression that a 100ml serving is ok from either an alcohol consumption or energy / calorie intake perspective?

- vi. HAND OUT TABLE RATING: Just looking at the energy information panel now, earlier you said the main information they were trying to get across was [RECAP]. Please write on the table at [NUMBER] a mark out of 10 for how CLEAR & UNDERSTANDABLE it is at getting that main information across (where 10 is excellent and 0 is terrible)

3. RATING: Out of 10 TALLY. Why?
4. In general, do you think version [2] is a good idea?

- Why could it be a good idea to include on spirits labels? What are the benefits?
5. What reasons could this NOT be a good idea to include on spirits labels? What are the downsides [THEN DO SAME FOR [3] AND [4]

COMPARE ALL THREE

- i. COMPARISON: So we've looked at three of these now. Put all three in front of you (that's two sheets of paper). Is one label easier to understand than another? Which is easier? Which is harder? Why?

Label Testing 3: (20 mins of 75 mins)

6. A2 & A4 Beer and Wine

HANDOUT 5, 6 & 7 [Aust. & NZ versions]: Display POSTERS D, E & F [Aust. & NZ versions]

- a. Now in the real world you probably just don't drink spirits. Hands up if you also drink beer or wine? So let's include beer/wine energy in the mix now. Have a look at these and take that information in for a moment.
 - i. INTENT/PURPOSE: Looking at each example, what are you seeing here? What do you think is the purpose of the 100ml energy measure on these labels? For what purpose might you use this information? Why? How?
 - ii. CLARITY: How easy is this energy information to understand? Why?
 - iii. COMPARISON: Thinking back to the spirits labels, how easy or difficult are they to interpret NOW that you have seen these labels? Why? What? Does it make sense to include/not include the 100ml measure here? On Spirits? Why?

PROMPT: Can you work out the energy for **one serve** of each type quickly and easily? What would need to be included/excluded to do that? Which is easier to use? When deciding what and how much to drink, how would you compare the information you need?

- iv. LIKELY USAGE: Would you use the 100ml information?

HANDS UP / RECORD Why use it? Why not use it?

- v. RATING: Give each a mark out of 10 for how CLEAR & UNDERSTANDABLE it is at getting that main information across (where 10 is excellent and 0 is terrible)

(If Time) Label Testing 4: (15 mins of 90 mins)

5. A2 & A4 Ready to Drink (RTDs) HANDOUT 8, 9 & 10: Display POSTERS G

- a. Now we have some more labels for you to have a look at. These will display information labels for spirits that are pre-mixed, or ready to drink. Have a quick look and take this information in. What are we seeing here? Can someone explain for the group?
 - i. CLARITY: Looking at each example, what is the information that is most clear and understandable to you? Are you able to easily interpret this information?
 - ii. COMPARISON: Moving between the spirits-only labels and the RTD labels, would you use any of the information for comparative purposes? What parts of the information do you use to compare the drinks? How would this affect your decision about how much or what drink to choose?

PROMPTS: Is this easy to do using these labels? What are the differences? Why do you think these are different? Which is easier to use?

- iii. RATING: Give each a mark out of 10 for how CLEAR & UNDERSTANDABLE it is at getting that main information across (where 10 is excellent and 0 is terrible)

(IF TIME) Label Testing 5: (15 mins of 105 mins)

6. A4 Diageo diagram/icon version HANDOUT 11, 12 & 13:

- a. This will be our final set of new labels. These labels display nutritional information for spirits again. Have a quick look at these and I will ask someone to explain the main difference here:
 - i. INTENT/PURPOSE: What is different about this label? Which part of this label would you be more likely to use? Why? What for? PROMPT: What job is the icon doing here?
 - ii. CLARITY: Is the icon doing an effective job? Why? Why not? PROMPT: Can you understand the information on this label? Is there any information on this label that you would not use/don't need?
 - iii. COMPARISON: Which form of spirits-only labels works best/worst when you are thinking about getting easy-to-read information? Why? What information are you needing/want?
 - iv. RATING: Give each a mark out of 10 for how CLEAR & UNDERSTANDABLE it is at getting that main information across (where 10 is excellent and 0 is terrible)

IF TIME Conclusion (15 mins of 1h 20 mins)

- 7. MAIN OBSERVATION We've just about covered everything I have, but I might just run around the room and ask each of you: Which energy label is MOST EASILY interpreted from all these, and why? [FOR THOSE WHO 100ml on large spirits is NOT most easily: Why was [SPIRITS x/y] NOT the easiest one to interpret?
- 8. IF ASKED CLIENT: Spirits and Cocktails Australia & Spirits New Zealand.

Thank & Close with incentive

Thank you for your time – that's been really useful feedback. We'll collate this with our other focus group findings and neither you nor your views will be identified, but rest assured your observations will figure in the results.

Appendix B

Community Focus Groups Screener

R210910 Community Focus Groups

Two pairs of focus groups:

- Brisbane & Auckland residents 18+
- Monday 6 March 2023 (Brisbane)
- Tuesday 7 March 2023 (Auckland)

Details

Topic: Energy Labelling of Beverages Containing Alcohol

Moderator: Insightfully Moderator

Locations & Venues:

- Groups 1 & 2
 - Adult residents from Australia, who are willing to attend a focus group
 - Venue to be booked by Q&A; 9 Parkview St, Milton QLD 4064
- Groups 3 & 4:
 - Adult residents from New Zealand, who are willing to attend a focus group
 - Venue to be booked by Q&A/Prime Research; 62 Aitken Terrace, Kingsland, Auckland 1021

Identifying the client:

- All individuals contacted will be informed that this is 'independent, scientific research'
- Individuals will not be told who the end client is until the end of the focus group at which point they can be told

Number: Recruit 10 for 10 in all groups

Type: Local adults (i.e. 18+ year)

- Consumers who have **purchased or used** a large bottle of spirits in the past month
- And who have also consumed beer or wine from a bottle/can in the past month
- Otherwise mix of age, gender and location

Length/Time: Up to 2 hours

Groups 1 starting at 5.45pm (5.45-7.45pm) and

Groups 2 Starting at 8pm (8pm-10pm)

Brisbane AEST (QLD) time

Auckland NZDT time

Incentive: \$100 (AUD/NZD) to be paid in cash by Insightfully

Equipment: Respondents do not require any equipment

Venues to provide pen/paper for each respondent; TV with HDMI cable and an extra desk with power available for moderator to place laptop on

Venues to include live web-cam and recordings after the groups

Signage: 'Focus group in [MEETING ROOM]. Please wait until called.'

Exclusions: Industries and occupations with a particular interest in food labelling, calorie intake or nutrition. Examples might include 'Food Standards Aust NZ' OR 'Dietitian' OR 'Weight Loss Consultant' OR 'Health Promotion Officer' OR 'Food & Beverage Sales or Rep'. (see screener)

Quotas:

- Quota on sexes
 - approx. 50/50
- Quota on ages
 - Each group:
 - 18-30: min 3 max 4
 - 30-55: min 3 max 4
 - 55+: min 3 max 4
- Quota on Beer & Wine consumption
 - Each group
 - Beer: Approx. 50%
 - Wine: Approx. 50%
 - Those who drink both can be used to boost the group lagging in numbers
- Employment status
 - Max. 2 unemployed in each group
 - Max. 2 retired in each group
 - Otherwise a mix of working status
 - Otherwise a mix of occupations

Screening Questions

THIS INFORMATION TO BE USED BY RECRUITERS TO RECRUIT RESPONDENTS

Hello, may I please speak to <PARTICIPANT NAME>?

My name is <RECRUITER NAME> and I am calling from <RECRUITMENT COMPANY>. We are running an evening of focus groups for an independent, scientific research project related to food and drink in [LOCATION], and are inviting a mix of participants who are generally representative of local people.

The groups are about 2 hours long and we are paying people \$100 for your time and your participation would be completely confidential.

Would you be interested in attending one of these groups?

ONLY If Asked About End Client:

- The research is being conducted by an independent research company, and the end sponsor of the research will be identified at the end of the focus group

ONLY If Asked About Researcher

- The groups will be moderated by an independent researcher. They are a member of The Research Society. This means they are bound by strict privacy rules and your participation would be confidential.
- We are only interested in your opinions and will not be attempting to influence you in any way.
- We are not trying to sell any products or services, we are looking for your opinions only. There is no food or drink tasting involved

Recruitment Screener

Great, I just have a few questions to make sure we get a good cross-section of the community.

- 1) Which town/suburb do you live in? CHECK QUOTAS

RECORD: _____

- 2) RECORD GENDER. CHECK QUOTAS
 - a. Male
 - b. Female
- 3) Which of the following age groups do you fall into? CHECK QUOTAS
 - a. Under 18 [TERMINATE]
 - b. 18-30 years
 - c. 30-55
 - d. 55+
- 4) Do you work in the health, nutrition, or beverage industries? If yes, please specify: _____

IF INDUSTRIES OR OCCUPATIONS SUCH AS 'Food Standards Aust NZ' OR 'Dietitian' OR 'Weight Loss Consultant' OR 'Health Promotion Officer' OR 'Food & Beverage Sales or Rep' ARE MENTIONED, TERMINATE.

- 5) During the past month, have you purchased or used a large bottle (at least 700ml) of straight spirits (alcohol)? This does not include a Ready to Drink mixed spirit's drink. 'Used' does not include serving drinks at a licensed venue.
 - a. Yes
If Yes, is that purchased or used? If 'used', what was it used for? (e.g. to make a neat or mixed spirits drink at home or not on a licensed premises)
 - b. No [TERMINATE]
- 6) Over the same period have you purchased or consumed and beer or wine not at a licensed venue?
 - a. Yes
If Yes, specify _____ CHECK QUOTAS
 - b. No [TERMINATE]
- 7) Which of the following best describes your employment status?
 - a. Employed full-time
 - b. Employed part-time / casual
 - c. Not working - Home duties
 - d. Unemployed
 - e. Retired
 - f. Student

If Does NOT Meet Quotas

Unfortunately, we already have a number of people attending the group sessions with a similar profile to yours, but may I list you as a standby in case one of those people cancels?

ONLY If Meets Quotas

As mentioned earlier, we would like to invite you to a community discussion group. It will go for up to 2 hours and will be moderated by an independent researcher.

You will be required to turn your mobile phone off (not just on to silent) during the 2-hour group.

INFORM PARTICIPANT OF DATE, TIME, LOCATION, TELL THEM TO ARRIVE 15 MINUTES BEFOREHAND

COMPILE RESPONDENT DETAILS / ANSWERS INTO A SPREADSHEET AND PROVIDE PARTWAY THROUGH RECRUITMENT AND DAY BEFORE GROUPS FOR REVIEW

Appendix C

(Deidentified) Respondent Specifications

	Gender	Age	Employment status	Occupation	Industry screen-outs	City	Suburb	700ml+ spirit user (not RTDs)	What was spirit used for	Other packaged alcohol past month
Gp 1	M	55 - 59	Self Employed	Owner	N/a	Gr Brisbane	Fig tree pocket	Yes	NFI	Yes - wine
Gp 1	M	50 - 54	Full Time	Lab Manager	N/a	Gr Brisbane	Deagon	Yes	NFI	Yes - beer, wine
Gp 1	F	25 - 29	Full Time	Office Manager	N/a	Gr Brisbane	Ashgrove	Yes	Cocktails at home	Yes - wine
Gp 1	F	50 - 54	Full Time	Admin Officer	N/a	Gr Brisbane	Everton Hills	Yes	NFI	Yes - wine
Gp 1	F	41 - 44	Full Time	Office manager	N/a	Gr Brisbane	Karalee	Yes	Neat spirits at home	Yes - beer, wine
Gp 1	M	70 +	Pensioner/Ret		N/a	Gr Brisbane	Kenmore	Yes	mixing	Yes - beer, wine
Gp 1	M	18 - 24	Student	Photographer	N/a	Gr Brisbane	Holland Park	Yes	Neat / on the rocks	Yes - beer, wine
Gp 1	F	25 - 29	Unemployed		N/a	Gr Brisbane	Jindalee	Yes	Mixed drinks at home	Yes - wine
Gp 1	M	30 - 34	FT Self Employed	Florist	N/a	Gr Brisbane	Windsor	Yes	Mixed drink	Yes - beer
Gp 1	F	55 - 59	Part Time	Crossing supervisor	N/a	Gr Brisbane	Balmoral	Yes	NFI	Yes - wine
Gp 2	M	25 - 29	Full Time	Business Analyst	N/a	Gr Brisbane	Forest Lake	Yes	Mix Drink/Neat/Shots	Yes - beer, wine
Gp 2	F	55 - 59	Full Time	Business manager	N/a	Gr Brisbane	Taringa	Yes	NFI	Yes - beer
Gp 2	M	25 - 29	Full Time	HR Coordinator	N/a	Gr Brisbane	Hamilton	Yes	Mixed drinks/Neat	Yes - wine
Gp 2	M	60 - 64	Full Time	Proposal Coordinator	N/a	Gr Brisbane	Sinnamon Park	Yes	Mixed drinks	Yes - beer, wine
Gp 2	F	50 - 54	Part Time	People & Dev. Manager	N/a	Gr Brisbane	The Gap	Yes	NFI	Yes - wine
Gp 2	M	35 - 40	Full Time	Senior Project Officer	N/a	Gr Brisbane	Nathan	Yes	Shots	Yes - beer, wine
Gp 2	F	45 - 49	Part Time, Student	Host	N/a	Gr Brisbane	Clayfield	Yes	Cocktails	Yes - beer, wine
Gp 2	F	60 - 64	Pensioner/Retired		N/a	Gr Brisbane	Jindalee	Yes	Mixed drinks	Yes - wine
Gp 2	F	25 - 29	Full Time	Obstacle Dispenser	N/a	Gr Brisbane	Forest Lake	Yes	Mixed Drinks/Shots	Yes - beer

COMMERCIAL IN CONFIDENCE

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	Gender	Age	Employment status	Occupation	Industry screen-outs	City	Suburb	700ml+ spirit user (not RTDs)	What was spirit used for	Other packaged alcohol past month
Gp 3	M	25	Employed FT	Analyst	N/a	Auckland	Central	Yes	Drink at home with friends	Beer, Wine
Gp 3	M	29	Employed FT	Freelance Event Tech	N/a	Auckland	West	Yes	Cocktails at home and at friends'	Beer, Cider
Gp 3	M	61	Employed FT	Ship planner	N/a	Auckland	North	Yes	Gin & Tonic. Consumed at home	Beer, Wine
Gp 3	M	40	Employed FT	University Lecturer	N/a	Auckland	Central	Yes	Made G&T with bottle of gin	Beer, Wine
Gp 3	M	47	Employed FT	Product Manager	N/a	Auckland	West	Yes	Bourbon, Rum and Coke at home	Beer, Cider
Gp 3	F	39	Employed FT	Sales manager	N/a	Auckland	South	Yes	Jack Daniels, drink neat & mixed	Beer, Cider
Gp 3	F	44	Employed part-time	Retail assistant	N/a	Auckland	South	Yes	Jim Beam, home with Coke Zero	Beer
Gp 3	F	56	Home duties	n/a	N/a	Auckland	Central	Yes	Kahlua, at home Espresso martinis	Champagne, Wine
Gp 3	F	27	Employed part-time	Business Owner	N/a	Auckland	Central	Yes	Mixed drink (tequila for margaritas)	Champagne, Cider, Wine
Gp 3	F	68	Employed FT	Office Manager	N/a	Auckland	North	Yes	To make a long gin with tonic water	Champagne, Wine

	Gender	Age	Employment status	Occupation	Industry screen-outs	City	Suburb	700ml+ spirit user (not RTDs)	What was spirit used for	Other packaged alcohol past month
Gp 4	M	53	Employed FT	Aluminium Joiner	N/a	Auckland	West	Yes	Jim Beam Whiskey Vodka, mix at home	Beer, Wine
Gp 4	M	59	Employed FT	Sales Manager	N/a	Auckland	Central	Yes	Whiskey, at home ice or mixer	Beer, Cider
Gp 4	M	25	Employed FT	Engagement Manager	N/a	Auckland	Central	Yes	Neat & Mixed	Beer, Cider
Gp 4	M	22	Employed FT	Real Estate Salesperson	N/a	Auckland	North	Yes	It was Vodka - used for guests	Beer, Champagne, Cider
Gp 4	M	46	Employed FT	Information Technology	N/a	Auckland	East	Yes	Negroni using Gin and Campari	Beer, Champagne, Cider
Gp 4	F	30	Employed casual	Mental health support	N/a	Auckland	North	Yes	Gin to make mixed drinks at home	Wine, Champagne
Gp 4	F	40	Employed FT	Project Administrator	N/a	Auckland	West	Yes	To make a mixed spirit drink at home	Beer, Wine
Gp 4	F	57	Bereavement leave	Na	N/a	Auckland	West	Yes	Bombay Sapphire gin, mixed with tonic	Champagne, Wine
Gp 4	F	27	Employed FT	Contractor - Project Man.	N/a	Auckland	Central	Yes	Making mixed drinks or taking to party	Beer, Champagne, Cider
Gp 4	F	55	Employed FT	Showroom manager	N/a	Auckland	South	Yes	gin, mix with tonic at home	Beer, Champagne, Wine

Appendix D

Table 1. Revised Quality Assessment Tool for Studies with Diverse Designs (QATSDDD)

Theme	Criteria number	Criteria	Insightfully Response
Research Background and Aims	1	<p>Explicit theoretical or conceptual framework.</p> <p>Consider:</p> <ul style="list-style-type: none"> Review of previous relevant studies/literature Rationale for the study and how it links together with the discussion of the results Application of existing theory (e.g. Theory of planned behaviour, Health motivation theory) or descriptive consideration of key concepts and their inter-relationships 	<ul style="list-style-type: none"> This study was undertaken as a result of FSANZ's current consultation into the proposal to include energy information on alcohol labels in Australia and New Zealand. Key stakeholders include Spirits and Cocktails Australia and Spirits New Zealand. These organisations are the peak bodies for the spirits industry in their respective countries. The organisations are collectively interested in ensuring the likely behaviours of spirits consumers in interacting with energy information on labelling are taken into account. Given the relatively short time-frame for consultation, a decision was made to conduct qualitative focus groups (McGivern, 2009) which allowed trained moderators to present carefully chosen respondents with stimulus information and to elicit responses on attitudes, opinions and behaviours. Hennink (2019) identifies that one focus group per stratum (group of people) is sufficient to identify the range of issues, but two focus groups per stratum are needed to fully understand those issues (and reaching meaning saturation). The decision was made, therefore, to conduct two pairs of groups in Australia and another two in New Zealand to ensure variations in attitude and behaviour could be identified across the locations. <ul style="list-style-type: none"> McGivern, Y. (2009). <i>The Practice of Market Research</i> (pp.174-180). Prentice Hall, Financial Times Hennink MM, K. B. (2019, August). What Influences Saturation? Estimating Sample Sizes in Focus Group Research. <i>Qualitative Health Research</i>, 29(10), 1483-1496, Other relevant studies/literature reviewed for this report included: <ul style="list-style-type: none"> Bornstein, R. F.-L. (2004). Mere exposure effect. In R. Pohl, <i>Cognitive illusions : a handbook on fallacies and biases in thinking, judgement and memory</i> (pp. 2015-235). New York, NY :: Psychology Press. Sweller, J. (1988). Cognitive Load During Problem Solving: Effects on Learning. <i>Cognitive Science: A multidisciplinary Journal</i>, 12(2), 139-297, and

			<ul style="list-style-type: none"> ○ Zajonc, R. (2001, December). Mere Exposure: A Gateway to the Subliminal. <i>Current Directions in Psychological Science</i>, 10(6), 224-228
	2	Statement of aims/objectives in main body of report.	Refer to page one.
	3	<p>Clear description of research setting.</p> <p>Consider:</p> <ul style="list-style-type: none"> • Who (specific target population) • What (clear research problem/question being studied in the target population) • Where (where the research took place, e.g., in lab/online/at home, and where participants were from) • When (when the research took place) • This criteria is not about a description of the data collection procedure or tools. 	<p>Who (Specific target population)</p> <ul style="list-style-type: none"> ■ Consumers of spirits (18+ years) in Australia and New Zealand who have purchased or used a large bottle of spirits at a non-licensed premises in the past months ■ And who have also consumed beer or wine from a bottle/can in the past month, and ■ Otherwise mix of age, gender and location ■ People who work in industries and occupations with a particular interest in food labelling, calorie intake or nutrition were not included in the group. Examples might include 'Food Standards Aust NZ' OR 'Dietitian' OR 'Weight Loss Consultant' OR 'Health Promotion Officer' OR 'Food & Beverage Sales or Rep'. (see screener) <p>What Refer to Page 1 of the report</p> <p>Where In a specialized focus group venue (Brisbane and Auckland)</p> <p>When 6 March (Brisbane), 7 March (Auckland)</p>
	4	<p>Fit between stated research question and research design.</p> <p>Consider:</p> <ul style="list-style-type: none"> • Research design e.g. experimental versus cross-sectional designs. This criteria is not about data collection tools. • Experimental designs are appropriate for establishing cause and effect e.g., the effect of labelling on behaviour. Whereas qualitative studies or surveys may be better suited to answer questions regarding consumer perceptions. 	<p>The objective of this research is to garner consumer options and stated behaviour of consumers in relation to labelling alcoholic beverages, specifically in relation to the inclusion of Nutritional Information Panels on spirits packaging.</p> <p>The aim is to better understand the influence of different content and format on the likelihood to use labels, what information is desired by consumers and what that information would be used for. Given the time available, the focus group methodology was assessed as the most suitable approach for the circumstances.</p>
Sampling and recruitment	5	<p>Evidence of sample size considered in terms of analysis.</p> <p>Consider:</p> <ul style="list-style-type: none"> • Discussion of smallest sample cell • Oversampling demographics of interest with low prevalence 	<p>A total of 4 focus groups were conducted in Brisbane and Auckland. A total of 37 respondents participated in this research and by the conclusion of the fourth group, minimal new perspectives were generated. This supports academic research from Hennink (2019) that saturation within a stratum is reached after two focus groups and three focus groups are sufficient to isolate the most important and dominant themes.</p> <p>Hennink (2019) says '64% of themes were generated from the first focus group, 84% by the third focus group and 90% by the sixth group'. When using a standardized respondent sample and a semi-structured moderator guide, as we have in this case, Hennink et al (2019) found that two to</p>

			three focus groups are sufficient to capture 80% of themes, including the most frequent themes, and three to six groups for 90% of opinions.
	6	<p>Representative sample of target group of a reasonable size</p> <p>Consider:</p> <ul style="list-style-type: none"> Online panels may limit ability to achieve a representative sample Convenience samples may limit ability to achieve a representative sample Demographic characteristics of the sample – is any subgroup over- or under-represented? E.g., if the aim of the study was to answer a research question regarding participants of various ages, then the sample is not representative if, for example, a very small percentage of the sample were young adults, and the majority were within an older age bracket. 	Due to overall small sample (n=37) the sample is said to be generally representative only of the target population, being adults who have purchased or consumed spirits in a non-licensed venue in the past month.
	7	<p>Detailed recruitment data</p> <ul style="list-style-type: none"> Describes the process of recruitment as well as response rates, drop-out rates etc. 	<p>An independent 3rd party recruitment agency was used to recruit respondents for the four focus groups. The agency used the Screener provided (Appendix B) to ensure respondents meet the target group specifications.</p> <p><i>Q&A Market Research has been building an extensive Australia wide panel of market research participants for 18 years. Most of our panel is built off the back of our telephone surveying which gives us a good reach into parts of Australia and specific demographics that aren't always captured with online built panels.</i></p> <p><i>Our recruitment process begins with a targeted short online screening questionnaire. This helps highlight the people that possibly fit within the specifications required for each individual project. From this point, these people are called and taken through the full screener from scratch over the phone with an interviewer before then being booked in.</i></p> <p><i>Quotas outlined in the recruitment specification are always followed as closely as possible to ensure the best representative sample.</i></p> <p><i>We are also ISO20252 and ISO27001 certified.</i></p>
Procedural details	8	<p>Description of procedure for data collection.</p> <p>Consider:</p> <ul style="list-style-type: none"> The order in which participants completed tasks/questionnaires. 	<ul style="list-style-type: none"> Single moderator for all for groups to ensure equivalence and reliability in facilitation methods

		<ul style="list-style-type: none"> Description of the data collection tools e.g., question wording/response options/stimuli given to participants. Note this is different from criteria 9 below which assesses whether the data collection tools were appropriate to use; criteria 8 assesses whether an adequate description was provided of the tools themselves. 	<ul style="list-style-type: none"> Internal consistency in coding is achieved by one team member taking primary responsibility for this task. In this case this is strengthened as the moderator who attended all the focus groups. Recording taken to provide reference checking
Data collection tools (Quantitative)	9	Data collection tools justified, reliability and validity assessed.	N/A
Data collection tools (Qualitative)	10	<p>Format and content of data collection tool justified. Consider:</p> <ul style="list-style-type: none"> Questions/schedules/stimuli/guides used for interview/focus groups How were the questions/guides developed? Based on existing theory/literature? Previously tested/piloted. Consideration of leading/biased questions. 	<ul style="list-style-type: none"> The moderator / discussion guide is included at Appendix A. Questions build upon knowledge, first obtaining spontaneous, non-prompted input and thoughts to minimise bias, followed by response to stimulus (included as images in the report) Groups were not piloted given time constraints. Questions were designed to understand both preference, likely usage, comprehension and interpretation of the stimulus materials provided
Data analysis (Quantitative)	11	Data analysis approach justified and undertaken appropriately	N/A
Data analysis (Qualitative)	12	<p>Analytical approach justified and assessment of reliability of analytic process Consider:</p> <ul style="list-style-type: none"> Approach to analysis described e.g., grounded theory, thematic coding. how did they develop codes, themes. techniques to increase trustworthiness in results e.g. multiple researchers, interrater reliability, member-checking (i.e., returning data to participants to check for accuracy and resonance with their experiences), audit trail, reflexive process, negative case search (i.e., searching for and discussing elements of the data that do not support or appear to contradict patterns or explanations that are emerging from data analysis). discussion of subjective influences of analysis 	<ul style="list-style-type: none"> Respondents are consulted from one group to the next in similarly constituted focus groups, to assess the credibility, importance and prevalence of themes and perspectives garnered in earlier groups. The method is one of progressive, iterative content validation. Used inductive content analysis coding categories – grounded theory approach

		<ul style="list-style-type: none"> Results adequately reported to support conclusions e.g., use of participant quotes. 	
Ethics	13	Ethics approval	<ul style="list-style-type: none"> Due to the short time frame and relatively low risk nature of this research formal ethical approval was not sought. As independent social researchers we are members of The Research Society, the Director is an accredited Qualified Professional Researcher and researches comply with the Research Society Code of Behaviour. Risk assessed LOW in relation to participant harm
Strengths and limitations	14	Strengths and limitations critically discussed?	<p>Strengths</p> <ul style="list-style-type: none"> Provides in-depth understanding of consumer opinion and the influence of stimulus on attitudes, and potential behaviours. Produces insights that would be less forthcoming without the interactions found in group settings. Qualitative methodology allows for full exploration and understanding of respondents' thought processes when interpretation multiple variations of information Goes beyond merely measuring preference to understanding cognitive processes <p>Limitations</p> <ul style="list-style-type: none"> Small scale, so not a representative sample Reliance on respondents' stated opinions in response to stimulus rather than a measurement of actual behaviour. Actual behaviour is not able to be measured in this study because final label variations have not yet been produced. Mock-ups represent only possible variations of energy information on labelling