



20th March 2023

Energy Labelling on Alcoholic Beverages Proposal  
Food Standards Australia & New Zealand  
PO Box 5423  
KINGSTON ACT 2604

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

**Response to the call for submissions– Proposal P1059 Energy labelling on alcoholic beverages**

I write to you today, to humbly ask that you reconsider the proposal to introduce energy labelling on alcoholic beverages. My name is Jason Harris, and I am Co-founder and Director of Operations at Big Shed Brewing Concern based in Royal Park SA 5014.

Small craft breweries are a vibrant, entrepreneurial industry that has grown significantly in Australia - 650+ breweries have an economic output of \$1.93 Billion, employing 6,891 people. For every direct job within the industry, 3.8 jobs are created in agriculture, manufacturing, supply, and hospitality - meaning the industry supports over 33,000 jobs. Within South Australia, 72 breweries operate: providing just over 2,000 jobs, boosting tourism, and supporting local communities.

I would like to echo submissions made by both the national Independent Brewers Association and also the South Australian arm of the IBA and make the following points.

- The economic climate currently for small breweries is very uncertain. Coupled with rising interest rates following shortly after 2 very impacted years due to Covid19 where we were forced to decrease our staff count from 39 to 7 and have now grown back to 64, this has been done with hard work, focus and typical small business mentality of getting the job done. We have had to deal with raw material costs with aluminium rising 12% in the last year. So any additional unforeseen costs, like a packaging change will be detrimental to our industry.
- Any labelling change unproportionally affects smaller brewers. With smaller volumes runs, any changes to packaging take a long time to recoup the investment in redesign time and then running out old, printed stock. If this change was to come in, along with other proposed changes it may mean destroying perfectly saleable raw materials. There is a material cost to this as well as an impact to the environment while they are destroyed and recycled without any first time use.
- Reading Section 5 of the proposal, I would submit the economic impact on my business would be detrimental. I currently have a minimum 14 SKUs. If each SKU must be relabelled that would mean a cost of approximately \$17,000.00 per SKU in can / cartons. These costs would mean our business would need to budget for these costs and it is simply not sustainable without agreement.

- Within the FSANZ submission there are references to an education campaign needed to help consumers understand the energy within alcoholic beverages. We would ask that this campaign is started in earnest before a labelling change is proposed.
- We also call for more in-depth studies to ascertain the effectiveness of energy labelling, when all studies presented have concluded that there is no significant effect on consumer buying or consuming behaviour. This is a big change for our industry, and we would like to be a part of the consultation process.
- We propose that FSANZ abandon any plans of a full Nutritional Information Panel on labels for craft breweries to avoid consumer confusion and reduce consumers' intentions to buy.

If you would like to speak to me regarding this submission, please find my contact details below.

Kind Regards.

