

16 March 2023

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604



Submitted via: submissions@foodstandards.gov.au

Dear Sir/Madam

Re: Proposal P1059 – Energy labelling on alcoholic beverages

Thank you for the opportunity to comment on Proposal P1059. I write on behalf of Cider Australia, the national industry body that represents cider producers in Australia. We aim to build a sustainable category by undertaking activities that improve the quality of ciders produced and marketed in Australia. We have more than 110 member organisations including Australian agricultural producers, cider makers, manufacturers and suppliers.

Cider Australia **supports** the mandatory provision of energy content information on alcohol labels. We appreciate and support various aspects of the proposal that seek to minimise implementation costs for business, in particular the 3 year transition period with stock-in-trade provisions, flexible methodology for calculating energy content and the commitment to align with any labelling changes arising from the carbohydrate and sugar claims process. We do not have any particular views or evidence to add in relation to the consultation questions 1-4.

However, Cider Australia is concerned about the large size of the 'prescribed format' panel which would be difficult to fit on already crowded labels. The paper does not take into account this cost to producers, which while difficult to quantify is real. The paper does not adequately justify why the prescribed tabular format is necessary and does not offer simpler options (such as '500kj' or '500kj per 330mL serve'). Cider Australia believes there is merit in waiting for resolution of European Union and CODEX energy labelling consultations to ensure the approach in Australia is consistent.

Please do not hesitate to contact me on [REDACTED]

Yours sincerely

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