# Carbohydrate and sugar claims on alcoholic beverages

Alcohol companies are currently drawing people’s attention away from the risk of harm associated with alcohol use by using marketing claims that make their products appear healthy, including ‘low sugar’ and ‘low carb’. There is strong evidence that nutrition content marketing claims like these can create a ‘health halo effect’ on unhealthy products.

In July 2023 Food Standards Australia New Zealand (FSANZ) asked for submissions on Proposal P1049: Carbohydrate and sugar claims on alcoholic beverages. This was in response to concerns raised at the Food Ministers’ Meeting (FMM) in 2017 about sugar free claims being misleading. Further concerns were that alcohol was being promoted as a healthier choice when public health advice is to limit alcohol intake.

FARE was invited by FSANZ to provide a submission in response to this proposal.

FARE’s submission included the following recommendation:

**that FSANZ amend the Australia New Zealand Food Standards Code (the Code) to prohibit carbohydrate claims being made in relation to alcoholic products and in doing so, provide irrefutable clarity in the intent of the Code to prohibit the use of sugar claims for alcoholic products.**

FARE’s submission highlighted the following concerns:

* FSANZ’s approach in developing the proposal was limited in intent and scope, with a disregard for the ‘health halo effect’, and is not in line with the FMM’s request
* FSANZ previously found in its 2017 Technical Assessment for carbohydrate claims about food containing alcohol that claims specifically about sugar were not to be permitted under the Code. Yet alcohol companies have been making prohibited sugar content claims for almost 5 years since then
* FSANZ has disregarded in its proposed amendments the Australian Dietary Guidelines to Reduce Health Risks from Drinking Alcohol, which strongly recommend limiting alcohol use to reduce risk from alcohol harms
* FSANZ did not consider harm from alcohol use in its cost-benefit analysis
* FSANZ moved away from its original intent of assessing potential harms from alcoholic products containing misleading sugar claims to addressing sugar information as the primary topic
* FSANZ should not have found costs to industry and removing labels prohibited under the Code as a leading factor in the cost-benefit analysis.

[view submission](https://fare.org.au/wp-content/uploads/230904-FSANZ-Carbohydrate-and-Sugar-Claims-FINAL-submission.pdf)