# Energy labelling on alcoholic beverages

Far too many Australians are negatively impacted by alcohol harm in Australia. Alcohol use is causally linked to over 200 disease and injury conditions. Nearly 6,000 lives are lost every year and more than 144,000 people hospitalised, making alcohol use one of our nation’s greatest preventive health challenges. In 2018, alcohol use contributed to 4.5% of the total burden of disease in Australia. Alcohol is also an addictive substance. In 2019, the National Drug Strategy Household Survey found that 10% of people in Australia who had an alcoholic drink in the previous 12 months were likely to meet the criteria for alcohol dependence when assessed by the Alcohol, Smoking and Substance Involvement Screening Test (ASSIST-Lite).

FARE welcomes the opportunity to provide a submission to the FSANZ consultation on proposal P1059 regarding energy labelling on alcoholic beverages. In our response to this consultation, we consider the proposal in relation to harms unique to alcoholic products (i.e., distinguishing alcoholic products from food and non-alcoholic beverages), alongside the contribution of alcohol to weight gain and obesity through the considerable contribution alcohol makes to daily energy intake when consumed.

In our submission, we reiterate our position and the evidence submitted to FSANZ via the targeted consultations that we have engaged in on this matter to date, and present additional information on aspects of the proposal that we have not yet consulted on.

In this submission, we also raise the need for consumer testing prior to introducing these labels. It is our understanding that such research does not exist. This gap in data needs to urgently be addressed to ensure that there is a clear understanding of how people in the community will interpret the energy labels. This is particularly vital for a product that contributes to significant harms both because alcohol is a drug and because alcohol contributes to unhealthy weight and obesity.

FARE supports mandatory standardised on-label energy information for alcoholic products. FARE has some concerns about the proposals being put forth by FSANZ, specifically relating to the reference to an industry specified serving size. We make the below recommendations, expanded on in this submission, to further strengthen the current proposal.

### Recommendations

1. Conduct consumer testing to understand how people in the community will interpret the energy information panel being proposed. This research should include testing of how people interpret ‘energy’ in relation to alcohol use and whether there are any potentially adverse impacts of terms being recommended for use.
2. Do not include information per serving as this may imply that the ‘serving size’ adopted by the alcohol producer is recommended. This has the potential to provide a message that increases the risk of harm to people in the community and further demonstrates the need for consumer testing of any potential label.
3. Apply the mandatory labelling consistently across all products and do not allow exclusions for alcoholic products made and packaged on the premise from which it is sold (e.g., wineries, breweries, distilleries) or for alcoholic products that are delivered packaged and ready for consumption (e.g., orders delivered to consumers by a liquor retailer).
4. Under P1049, seek to remove the exemption that allows alcoholic products to make energy claims, carbohydrate claims and sugar claims as these claims can be misinterpreted as suggesting that alcoholic products contribute to positive health outcomes. This is highly problematic for products that cause significant harms to the community.

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