

Attachment A: Australian Roundtables – Public Health

Energy labelling of alcoholic beverages

Summary Report

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# Introduction

A roundtable meeting was held in Sydney on 28th June, 2017 which provided key Public Health stakeholders with the opportunity to respond to the *‘energy labelling of alcoholic beverage targeted consultation paper’* (herein; targeted consultation paper) prepared by Food Regulation Standing Committee (FRSC). This roundtable consultation, which is complementary to the call for written submissions, provided key Public Health stakeholders with the opportunity to raise issues and share ideas, in a face-to-face setting, with other stakeholders.

## Problem Definition and aim of consultations

As defined in the targeted consultation paper, the primary problem centres around the lack of information provided to consumer to make informed purchasing and consumption decision in regards to alcohol. More specifically, the targeted consultation paper defines the problems as follows:

*‘A consumer’s ability to understand the energy contribution that alcohol makes to their diet is severely limited, as currently alcoholic beverages are exempt from the requirement to contain nutrition information on the label’.*

The primary objective of the roundtable consultation was to:

* share ideas, knowledge and opinions in a group setting;
* seek feedback on the issues of energy labelling of alcoholic beverages to better understand the advantages, disadvantages and challenges associated with energy labelling on alcohol to provide input into the policy development process;
* seek views in identifying and exploring potential regulatory and non-regulatory policy options and to inform impact analysis; and
* inform the policy advice to be provided to the Australia and New Zealand Ministerial Forum on Food Regulation (the Forum).

## Overview of the FRSC Policy Development Process

Mr Jim Dodds, on behalf of the FRSC, provided a brief overview of the Australian and New Zealand Ministerial Forum on Food Regulation’s (the Forum) policy development process. The Food Regulation Policy Framework sets out a nine stages process.

**Figure 1 – Food Regulation policy Framework**

Figure 1 - food Regulation policy framework; 
This is a box, the with alphabetised colums that represent stages in policy development: 
A for project proposal;
B for problem analysis;
C for Gateway 1;
D for define success;
E for develop options;
F for provide advice;
G for Gateway 2;
H for build / implement; 
I for evaluate;
J for communication and engagement; and 
K for gather data, information and evidence. 

The stages are highlighted to indicate where the process for this particular work is at. this figure currenly has D, highlighted green, meaning it is in the stage of 'define success.


In respect of energy labelling of alcoholic beverages, the policy development process is currently between stages four and five (Stage D and E of the Framework as shown in Figure 1). The scope and issues have been agreed, and the problem (as above described above) has been defined.

As has been described in the targeted consultation paper, FRSC is currently in the process of developing and evaluating options for implementing energy labelling of alcoholic beverages. The paper provides a summary of the available literature and data sources, and explores a mixture or regulatory and non-regulatory options.

Feedback obtained from the roundtable consultations will be reviewed and incorporated in the development of the final public consultation paper and subsequently in the formulation of recommendations and policy advice that is provided to the Ministers.

## Purpose of this document

This document presents the summary of the discussions at the Public Health roundtable meeting and notes any of the key suggestions emerging from the meeting.

# Summary of Roundtable Discussions

There were 11 attendees at the Public Health roundtable discussion, three representatives from Public Health organisations and eight representatives from Government organisations (see Appendix B). Government representatives attended as observers and provided contextual and clarifying input where appropriate. This Chapter provides a summary of the discussions around the seven key questions, as outlined in the targeted consultation paper.

## Consumer Opinion on Energy Labelling of Alcholic Beverages

Public Health representatives were of the view that there is overall support from consumers for the energy labelling of alcoholic beverages. Whilst there is limited information and data available to substantiate this view or any subsequent impacts, it is believed that there is a current lack of understanding from consumers in relation to the amount of kilojoules contained in alcoholic beverages and that energy labelling would be beneficial in providing consumers with this information.

With reference to the survey data resulting from the Australian university and state based surveys provided in the targeted consultation paper, public health representatives indicated that there appears to be support from the majority of consumers for kilojoule labelling on alcoholic beverages. They stated that the data presented suggests that there would be no objections from consumers should energy labelling in alcoholic beverages be implemented.

Although not specific to energy labelling of alcoholic beverages, the Australian Institute of Health and Welfare conduct a National Drug Strategy Household Survey *(the latest survey was conducted in 2016 with key findings available online)*. Public health representatives noted that the results show that approximately 60% of respondents considered the provision of health information on products an important measure, suggesting that there is a want from consumers to be better informed regarding their consumption behaviour. It was also noted that this finding is consistent with the result contained in the 2016 Health and Lifestyles Survey conducted by the Health Promotion Agency in New Zealand, expected to be released shortly.

## International Standards, Regulations, voluntary codes & Policy Action

Public Health representatives believed that the targeted consultation paper covered the domestic and international standards, regulations, voluntary codes or schemes and policy actions that were relevant to energy labelling of alcoholic beverages. Whilst the public health representatives did not have any additional information to provide, a few key points on what is presented were noted:

* The international references provided in the targeted consultation paper are recent and considered to be relevant.
* The targeted consultation paper highlights the variability in the alcohol sector and that there are currently various levels of implementation for energy labelling in alcoholic beverages. In particular, it was noted that the targeted consultation paper provide examples of the voluntary nutrition labelling initiatives that have been implemented, or have been committed to by global suppliers.
* The targeted consultation paper summarises the European Union position on labelling of alcoholic beverages. It was raised that in Europe, health claims (e.g. ‘low calorie’) are not allowed for alcoholic drinks with greater than 1.2% of alcohol content.

## VIew on Industry Perspective on Energy Labelling of Alcholic Beverages

The nature of the alcohol industry was described by a government representative. The alcohol industry is diverse, both across categories (i.e. wine, beer and spirits) and within categories (small producer to large global conglomerates). In Australia, small breweries and wine makers account for a large number of producers, but only account for a small market share, and it was pointed put that the implementation of mandatory labelling would impact these companies differently when compared to the larger producers. Whilst energy labelling is on the radar of these smaller producers, the implementation of energy labelling on their product is likely to be a significant undertaking and poses many challenges within the context of other labelling initiatives such as country of origin or pregnancy warning on labels.

There was a Public Health representative view that industry is currently voluntarily providing nutrition information on their labels to provide them with a competitive advantage and using labelling as a PR tactic to promote consumption of their products rather than the provision of information to consumers. This behaviour has been mainly by larger companies, where it is believed that they view the use of labelling as ‘good marketing’. Public Health representatives raised the concern that energy labelling of alcoholic beverage should be used to educate consumers and to reduce the risk of misuse, and that this purpose of the labelling should be clearly communicated. In particular, concerns were expressed that the Industry could use labelling to imply that alcohol is a ‘healthy’ product if nutrition information was provided.

Public Health representatives recognised that there are a number of alcohol companies that currently provide nutrition information on their website. The value of this mechanism for educating consumer was questioned, and in particular, participants noted that they would like to understand the volume of consumers that visit these websites to obtain nutritional information.

## Linkage Between Energy Information, weight management and alcohol Consumption

Public Health representatives acknowledged that there is little information or research available that looks specifically into the linkage between energy labelling, alcohol consumption and weight management. They believed that the targeted consultation paper draws on the available information, and provides a sufficient summary of the information that is currently published. It was noted that whilst the limited evidence to support energy labelling may be criticised, Public Health representatives noted that consumer rights should be considered.

It was acknowledged that whilst there is a lack of evidence to support whether energy labels on alcoholic beverage will actually result in behaviour changes, there is a clear disparity in the labelling requirement between food products (including soft drinks) and alcohol. More specifically, the question was raised as to why alcohol has been exempt from the labelling requirements of food products and soft drinks; and whether it is appropriate for consumers to have nutritional information on foods and soft drink, but not alcohol.

## Intervention Options

A broad range of options were discussed for the implementation of energy labelling of alcoholic beverages, from it being mandatory to being entirely voluntary. During this discussion, Public Health representatives noted that experience from other international health labelling examples suggest that voluntary or self-regulated methods do not work as there is often inconsistency and varying uptake of the voluntary initiatives.

Irrespective of the option that is chosen, public health representative noted that it is important for there to be consistency in the messaging and that there is a need to ensure that consumers understand what the labels are attempting to communicate. It was acknowledged that energy labelling forms one component in informing consumers of the impact alcohol is having on their daily kilojoule consumption and that any measure that is implemented will need to be supplemented with education and communication strategies that are in line with the broader objectives (weight management) and state and national initiatives.

To increase consistency of the messages being received by consumers, a number of measures were raised by public health representative:

* It is believed that having standardised labelling would increase the impact of the messaging and reinforce the message to consumers.
* An example of this standardisation described by a government representative is the use of County of Origin labelling that has recently been implemented in Australia. Country of Origin labelling is a regulatory measure that comes under the Australian Consumer Law, and is enforced by the Australian Competition and Consumer Commission (ACCC). Information is provided to business to ensure that labels are displayed on packaged food are in accordance with the Information Standards. This information includes online tools and guidelines on how Country of Origin Labelling must be displayed on packaged food. In addition, for those products where Country of Origin Labelling is not mandatory (i.e. not targeted priority products), should businesses choose to voluntarily provide this information, it must be provided in line with the Information Standards.
* Another aspect of consistency that needs to be considered is the volume for which the energy content is calculated. To assist consumers to understand and compare across products, consideration should be given to the serving size. It was noted that the alcoholic beverages sector is in a unique position when compared to the food sector, as it can leverage the currently used and accepted measure of a ‘standard drink’ and report the ‘energy content per standard drink’ (percentage daily intake was used as an example of how energy information could be labelled using ‘standard drink’ sizes or single serve products (i.e. a bottle of beer) as the serve size).

Given that approximately 20% of alcohol in Australia and 30% in New Zealand is consumed ‘out of package’ (i.e. in bars, pubs and restaurants), the mechanism for providing energy information in these settings was discussed. Public Health representatives noted that this is not a new issue for alcohol labelling, and a similar issue was raised in the pregnancy labelling considerations. One option for consumers to obtain energy information could be to implement a system similar to the kilojoules on menus (‘menu board’) implemented in NSW, requiring larger fast food and snack food chains to display energy content on their menu’s (similar initiatives have also been implemented in Queensland, South Australia and the Australian Capital Territory and will be implemented in Victoria in May 2018). Implementing a similar initiatives for alcoholic beverages consumed in pubs, bar or restaurants would need to consider the consistency of energy reported, particularly as portion size is often inconsistent and varied across States. Given the complications of implementing a menu board system, the question was raised as to whether this step would be required as the large majority of alcohol is actually consumed in packages and, if the information is made available on packages products, there is likely to be a flow on effect by consumers being more educated and able to make more informed purchasing decisions at pubs, bars or restaurants.

Given the diverse nature of the industry, there were questions raised by a government representative as to whether the implementation of mandatory labelling could be segmented across the industry. As this concern particularly related to the impact that labelling would have on smaller producers, the question was raised whether the implementation of mandatory labelling could be targeted to organisations with larger market share, similar to the way menu board regulation has been implemented. Whilst this suggested segmentation of the market for regulatory purposes may be a potential approach public health representative reiterated that should businesses choose to provide energy labelling voluntarily, the information should be presented in a manner which is consistent.

## Potential Risks or Isssues

As noted during the discussion regarding Public Health representatives’ view on industry perspectives, the risk was raised again by public health representative that industry would use energy labelling of alcoholic beverage as an advertising tactic, and not necessarily as a means to deliver a public health message. Alcohol is a discretionary food, and it is important that consumers understand that despite alcohol containing a nutrition panel on the label, alcohol has no nutritional value. Having a clear set of guidelines and standards to support the energy labelling of alcoholic beverages would be one means to assist in ensuring the correct messages are being delivered.

It was also acknowledged that providing consumers with greater information on energy intake due to alcohol consumption has the potential to pose a number of behavioural risks. Two risks particularly noted by Government representatives were:

* Individuals may, or already do choose, to skip meals in order to ‘save’ kilojoules for alcohol consumption; or
* Individuals may choose to the use of recreational drugs as a zero kilojoule alternative to alcohol.

The consumer’s understanding of the information provided was also raised as an issue that needed to be taken into consideration, especially given that there is little consistency across the different products. It was acknowledged that consumer education was important (as had been previously noted during the discussion on intervention options), and the use of labelling is not likely to lead to behaviour change on its own. It was suggested that the education campaign should aim to deliver simple messages, particularly around the fact that alcohol contains kilojoules, and consumption of alcohol increases your daily kilojoule intake. Another aspect of the labelling is to consider providing consumer with the context of how the consumption of alcohol contributes to total daily intake (i.e. percentage of total daily energy intake).

## Impact for Stakeholders

Public Health representatives were of the view that energy labelling of alcoholic beverages is a consumer right issue and would increase the level of information that is available to consumers. When considered in the broader campaign on obesity prevention, the series of education measures would lead to greater awareness of the impact of alcohol consumption and understanding of the information provided. In addition, the provision of nutrition information would make the labelling requirements of alcohol beverages consistent with what is required for food and beverage products (with particular reference to soft drinks, which are also considered a significant contributor to overall energy intake).

The issue was raised that there is also a need to understand and consider what consumers actually look for and consider most important when looking at the back of a label, particularly given the little amount of space that is available. The back of the labels contain information such as standard drinks, health warnings, allergies, food compliments and ingredients; and the impact of energy labelling will depend on what consumers consider important. Given that there is limited space on labels, it was suggested by a Government representative that the kilojoule content could be put on the front of label, which is likely to be a more effective method of communicating to consumers (percentage daily intake was discussed and the example of its use on some confectionery packages (e.g. ‘snakes’) was highlighted).

# Appendix A – Roundtable Agenda

**Energy labelling of alcoholic beverages**

**Australian Roundtables – Public Health**

Meeting Venue: Level 10, 260 Elizabeth Street, Surry Hills, NSW 2010

**AGENDA**

**Wednesday 28th June 2017**

|  |  |
| --- | --- |
| **Time** | **Agenda Item** |
| **14:00 – 14:30** | Registration |
| **Session I:** | **Opening Session** |
| **14:30 – 14:35** | Welcoming remarks – Representative from HealthConsult |
| **14:35 – 14:45** | Introduction of Roundtable Participants |
| **14:45 – 14:50** | Setting of Ground rules |
| **Session II:** | **Overview of the policy development process** |
| **14:50 – 15:00** | Overview of the policy development process – Representative from the Food Regulation Standing Committee |
| **Session III:** | **Roundtable Discussions** |
| **15:00 – 16:00** | Roundtable discussion on the consultation questions (see below) |
| **Session IV:** | **Closing Session** |
| **16:00 – 16:15** | Discussion on summarising the key ideas shared during roundtable discussion |
| **16:15 – 16:30** | Closing remarks, including next steps |

**Questions to be asked during the roundtable discussions**

1. What is your understanding of, and views on, consumer opinion related to the energy labelling of alcoholic beverages?
2. Are you aware of any international standards, regulations, voluntary codes or schemes, or policy actions relevant to energy labelling of alcoholic beverages?
3. What is your understanding of, and views on, the industry and trade perspectives related to the energy labelling of alcohol?
4. What is your understanding of, and views on, the policy linkage between energy information, weight management and alcohol consumption?
5. What types of intervention do you consider appropriate in addressing the identified problem and what are the advantages, disadvantages, challenges and costs associated with the intervention option(s)?
6. What are the potential risks or issues associated with the energy labelling of alcoholic beverages that should be considered in the identification and assessment of intervention options?
7. What are the impacts for stakeholders that need to be considered in this policy development process?

# Appendix B – Roundtable Attendees

|  |  |
| --- | --- |
| **Name** | **Organisation** |
| **Emma Lonsdale** | Australian Chronic Disease Prevention Alliance |
| **Amy Ferguson** | Foundation for Alcohol Research and Education |
| **William Gilmore** | National Drug Research Institute |
| **Chrystal Yam** | VIC Department of Health and Human Services |
| **Holly Jones** | Australian Government, Health |
| **Nick Blong** | Australian Government, Agriculture |
| **Liz Munn** | NSW Centre for Population Health |
| **Jim Dodds** | WA Health |
| **Catrina McStay** | WA Health |
| **Felicity Lawlor** | NZ Ministry for Primary Industry |
| **Kati Laitinen** | NZ Ministry for Primary Industry |