

## Food Standards Australia New Zealand proposal for the inclusion of carbohydrate and sugar claims on alcoholic beverages (P1049)



In 2023, Food Standards Australia New Zealand (FSANZ) opened a consultation regarding carbohydrate and sugar claims on alcoholic beverages. Cancer Council were supportive of FSANZ's consideration of this important matter and welcomed the opportunity to respond to the proposal.

Alcohol is a class 1 carcinogen and causes cancers of the bowel, breast, liver, mouth, throat (larynx), oesophagus and stomach. (1) In 2013, alcohol use was associated with almost 3,500 cancers in Australia. (2) More than a quarter of Australian adults drink alcohol at levels that put them at risk of harm from alcohol-related disease or injury, and this is as high as one-third in some population groups (such as males). (3)

In this submission to the proposal for carbohydrate and sugar claims, Cancer Council reiterated our position previously expressed in consultation processes of strong opposition to FSANZ's proposal to permit nutrition content claims about carbohydrate and sugars on alcohol products. All alcohol products increase the risk of cancer, regardless of their sugar or carbohydrate content. Any marketing and promotion of alcohol products in a way that implies a product is 'healthier' therefore must not be permitted, with the exception of appropriately identifying zero- or low-alcohol products.

There is sufficient evidence to suggest that carbohydrate and sugar claims contribute to consumer confusion and incorrect assessments of the 'healthiness' of alcohol products.

Cancer Council strongly opposes the inclusion of full nutrition information panels on alcohol labels because kilojoule (energy) values are the most important information when comparing alcohol products, and providing anything further is potentially confusing for consumers.

To protect the public from being misled by sugar and carbohydrate claims on alcohol labels, Cancer Council recommended that option 3 of the proposal, the removal of the permission in the code to make nutrition content claims on alcohol products, be adopted.

Further recommendations for this proposal included:

- The FSANZ evidence review is revised and strengthened, considering commercial biases, the exclusion of references that are not peer-reviewed journal articles, and the significant body of evidence on the impact of nutrition content claims on food labels on consumer understanding and behaviours.
- The Shape of Australia Report results on claims on alcohol labels are considered and incorporated into recommendations on the final proposed approach.
- Alcohol-related harms are considered in cost and benefit analysis.

Further information on the proposal can be found on the FSANZ website: [Proposal P1049](#).

## References

1. World Cancer Research Fund/American Institute for Cancer Research. Diet, Nutrition, Physical Activity and Cancer: a Global Perspective. Continuous Update Project Expert Report. 2018.
2. Wilson LF, Antonsson A, Green AC, Jordan SJ, Kendall BJ, Nagle CM, et al. How many cancer cases and deaths are potentially preventable? Estimates for Australia in 2013. *International Journal of Cancer*. 2018;142(4):691-701.
3. Australian Bureau of Statistics. National Health Survey 2020-21: Alcohol consumption. Canberra: ABS; 2022.