

August 2017

Australian Wine Industry Response – Nutritional Labelling

The WFA does not support allocation of government resources to address a “problem” which is unclearly defined, lacking genuine drivers and implying solutions which are outdated or irrelevant to modern consumers. It is unclear what outcome is being sought by government through this process.

During the initial consultation there have been two indicated outcomes discussed:

1. Addressing obesity/weight management issues (changing behaviour) - The WFA does not recognise this as relevant to the discussion as alcohol consumption is only one of several factors related to weight management and there is no basis for suggesting that energy labelling of alcohol, will be an effective mechanism to address changing behaviour.
2. Informing consumers – The WFA completely supports informing consumers. However, we disagree that energy labelling on alcohol is the most effective means of informing or educating consumers in the 21st century. The energy labelling solution was posed in 2009 and since this time, technology and the way consumers interact with purchases has significantly changed. In the current day there are more dynamic and flexible technologies available such websites, social media, calorie calculators and web/smartphone applications, that would be significantly more effective at informing and educating modern consumers.

Government should therefore reconsider the drivers for this process, their intended outcome and clarify this with the WFA and other stakeholders before considering any further action. Pending a revision the WFA would like to provide the following comments in regards to the current consultation on energy labelling:

1. The Government should clearly define the intended outcome before seeking solutions. Is the aim to inform consumers or change behaviour?
2. The Governments’ defined problem, as outlined in the consultation paper, is too narrowly defined as it infers on label nutritional information is the only solution to the defined problem. It should be removed or amended.
3. The WFA supports transparency and consumers rights to information in making informed choices regarding the products they consume.
4. The WFA does not support the provision of mandatory nutritional information panels or energy values on product labels as a valid means of addressing the perceived problem.

5. Off-label solutions for informing consumers, including, but not limited to generic web content, company specific web content, applications as well promotional campaigns are considered more effective in modern times for informing consumers.
6. The WFA appreciate the Governments' intentions to seek industry consultation. We seek the opportunity and flexibility to address public health or information concerns through industry lead initiatives (with government support) in addressing any perceived problems. Voluntary or co-regulatory approach similar to the pregnancy warning label initiative are effective and strongly supported by the wine sector.
7. The WFA question the genuine need and allocation of resourcing to solve a problem that lacks clear definition and direction. We believe there are more appropriate aspects to focus government resources on in broadly addressing health related concerns and informing consumers such as moderate consumption. The Food Labelling Hierarchy outlined in the Blewitt Review clearly identified food safety issues as having a priority with respect to labelling. Other issues, including energy/calorie labelling that do not relate to food safety, but instead to consumer information are better suited to other communication mediums.