

## Response ID ANON-V5ES-G4PK-S

Submitted to **Public Consultation: Labelling of sugars on packaged foods & drinks**  
Submitted on **2018-09-19 11:59:52**

### Submitter details

#### Privacy and confidential information and permissions

No

If you want all or parts of this submission to be confidential, please state why.:

#### Submitter information

**Full name:**

DAMIEN GRIFFANTE

Yes

**Name of organisation:**

Winemakers' Federation of Australia

**Sector:**

Industry

**Please provide your email address.:**

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If we require further information in relation to this submission, can we contact you?:

Yes

#### Have you read the Consultation Regulation Impact Statement?

Have you read the Public Consultation Regulation Impact Statement: Labelling of sugars on packaged foods and drinks? (Please click on the link above to open the document)

Yes

#### Survey Questions 1-4

**1 Do you support the statement of the problem: "Information about sugar provided on food labels in Australia and New Zealand does not provide adequate contextual information to enable consumers to make informed choices in support of dietary guidelines"?**

No

If you do not support this statement, please justify why not with your reasons.:

Consumers are becoming more conscious of the foods they consume. In regard to sugar WFA does not believe that there is sufficient evidence to warrant altering the status quo to address the proposed problem. In consideration of sugar content of food, consumers only need to be aware of one factor, being total sugar, which is already a requirement for various food categories under the status quo. The human body does not distinguish between naturally occurring vs added sugars and therefore the only contextual information that is relevant to consumers is total sugar. Various mechanisms to alter the status quo to provide consumers information on added sugar may result in a range of unintended consequences, which may in effect work contrary to the objective.

If you would like to provide an alternate problem definition, please enter it below and justify your statement with evidence:

**Please attach references here:**

No file was uploaded

Not Answered

**2 Are you aware of any form of information about added sugars that is provided on food labels in addition to those identified in section 1.6 of the Consultation paper?**

Not Answered

If yes, please provide details here and justify with evidence.:

**Please attach references.:**

No file was uploaded

Not Answered

**3 Are you aware of other sources of information (publically available or otherwise) on the added sugars content of foods available in Australia and New Zealand beside those described in section 1.8 of the Consultation paper?**

Not Answered

**If yes, please provide details here and justify with evidence.:**

**Please attach references. :**

No file was uploaded

Not Answered

**4 Do you agree with the desired outcome of this work: "Food labels provide adequate contextual information about sugars to enable consumers to make informed choices in support of the dietary guidelines"?**

Not Answered

**If no, please suggest an alternate desired outcome and justify your suggestion.:**

**Please attach references here:**

No file was uploaded

Not Answered

**Option 2: Education on how to read and interpret labelling information about sugars**

**5 Effectiveness, strengths and weaknesses of this option**

**How effective would this option be in addressing the policy issue and achieving the desired outcome? :**

Effective

**Please provide evidence to justify your views. :**

WFA strongly supports the status quo. However, we suggest that if the government is seeking to address the proposed problem ("Information about sugar provided on food labels in Australia and New Zealand does not provide adequate contextual information to enable consumers to make informed choices in support of dietary guidelines"), targeted education, rather than additional or altered labelling requirements would be the most effective mechanism to address it. Targeted education campaigns have been shown time and time again to be the most effective mechanism for addressing health related outcomes. For the Alcohol industry the most relevant example of such is the success of DrinkWise and the various campaigns targeting at risk consumers. It is also clear from the consultation paper that the resources that could provide greater contextual information to consumers have already been developed and are available through a range of government websites and other providers. The extension and targeted promotion of this information should therefore form the basis of addressing the proposed problem. This would be the most cost effective approach for both industry and government (as the resources already exist) and, if modelled on other targeted campaigns such as DrinkWise, would also be the most effective.

WFA argues that deviating from the status quo and by altering existing labelling requirements creates potential unintended consequences and risks further compounding any confusion by introducing new or altered labelling.

Under the status quo wine is exempt from labelling the Nutritional Information Panel (including sugar) as wine is a single ingredient food (grapes). While grapes contain naturally occurring sugars and in certain circumstances sugar can be added (through the winemaking process), for the majority of wines residual sugars are removed from the final product during the process of fermentation. There are a range of winemaking practices that allow for the manipulation of sugar and flavour profiles of grape juice and resulting wine. These include:

- Dosage is a process used in the production of sparkling wine, in which a secondary ferment occurs in bottle by adding a small amount of wine (usually mixed with sugar) back to the bottle once the yeast sediment that collects in the neck of the bottle is disgorged.
- Chaptalization is the process of adding sugar (refined white saccharose) to unfermented grape must (juice and skins) in order to increase the alcohol content after fermentation. This process is practiced globally and is legal in many wine producing countries. However, it is not allowed in Australia. In countries where it is legal, it is typically limited to a 2% volume increase of alcoholic strength. More often, it is limited to a 1-1.5% in order to prevent the increased alcohol content from impacting flavour characteristics. The sugar must be at least 99% pure and can be derived from any plant. The volume of sugar required to increase a wine in alcohol content by 1% varies from 16-19 g/l in red wine and 17 g/l in white wine. No residual sugar remains in the final product as it is fermented and converted into alcohol.
- Conversely, through a recent regulatory change, Australian Wine producers may now add minimal amounts of water to grape juice or must (before fermentation) to reduce the naturally occurring sugar level of the juice or must to a minimum of 13.5 degrees Baumé (Baume is A measurement of the dissolved solids in grape juice that indicates the grape sugar level and ripeness).
- The addition of Grape Juice concentrate (containing sugar) is also legal in Australia. This is typically utilised to alter flavour characteristics of the final product and occurs before fermentation.

The complexity of these various Oenological practices highlights that for wine, the altering of naturally occurring sugars or the addition of sugar are not relevant to

the consumer as they rarely remain in the final product as sugar. For these reasons wine holds its current exemption from labelling NIP and there is great concern that any alteration may not only be costly for businesses but could also result in greater confusion and uncertainty for consumers.

For example: If a sparkling wine were required to list the addition of sugar and it had undergone dosage, it may confuse a consumer into thinking the final product (which has no sugar at all remaining) was higher in sugar than say a fortified wine only containing naturally occurring sugars.

The risk of unintended consequences is too great for the wine industry and for this reason we strongly support the status quo. If the proposed problem does in fact require action, we would consider educational campaigns as the most effective mechanism for addressing any concerns regarding consumer understanding of sugar in food.

**Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:**

**Please describe what these are?:**

**Please attach references here:**

No file was uploaded

Not Answered

## **6 Impacts**

**How would this option impact you?:**

A lot

**Please provide impacts and cost relevant to you, with evidence to justify your views.:**

Provided the status quo is maintained, option two would have a highly positive impact and be the most effective mechanism for addressing the proposed problem as outlined in previous answers. As well as being the most effective option, it would have the least associated cost compared to any other option for both industry and government, as the resources which need to be promoted and extended to consumers already exist.

**Please attach evidence to justify your views. :**

No file was uploaded

Not Answered

## **Option 3: Change to statement of ingredients**

### **7 Effectiveness, strengths and weaknesses of this option**

**How effective would this option be in addressing the policy issue and achieving the desired outcome?:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:**

**Please describe what these are?:**

**Please attach references here:**

No file was uploaded

Not Answered

## **8 Impacts**

**How would this option impact you?:**

A lot

**Please provide impacts and cost relevant to you, with evidence to justify your view.:**

High risk of unintended consequences and additional cost to industry and government.

**Please attach references here :**

No file was uploaded

Not Answered

## **9 Implementation mechanism**

**Referring to Table 1 in section 3 in the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:**

**Please provide the pros and cons of your selected implementation mechanism, using evidence to justify your view.:**

**Please attach references here :**

No file was uploaded

Not Answered

## **Option 4: Added sugars quantified in the NIP**

### **10 Effectiveness, strengths and weaknesses of this option**

**How effective would this option be in addressing the policy issue and achieving the desired outcome? :**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:**

**Please describe what these are?:**

**Please attach references here:**

No file was uploaded

Not Answered

### **11 Impacts**

**How would this option impact you? :**

**Please provide impacts and cost relevant to you, with evidence to justify your view.:**

**Please attach references here :**

No file was uploaded

Not Answered

### **12 Impact on existing elements of a food label**

**How would the proposed option impact existing elements of a food label (both mandatory and voluntary)?:**

**Would adopting this option require another element of a food label to be removed from the package?:**

**If so, which labelling element/s would be removed?:**

**Please provide evidence to justify your response. :**

**Please attach references here:**

No file was uploaded

Not Answered

### 13 Implementation mechanism

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option:

Please provide further comments here:

Please attach references here:

No file was uploaded

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

### Option 5: Advisory labels for foods high in added sugars

#### 14 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome? :

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Please provide evidence to justify your views. :

Please attach references here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Please describe what these are?:

Please attach references here:

No file was uploaded

Not Answered

#### 15 Impact

How would this option impact you? :

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your response.:

As outlined previously, for wine the presence of naturally occurring sugars in wine grapes, or the addition of sugar during the winemaking process does not equate to sugar levels in the final product. In addition, (although not defined in the paper) there are no circumstances under which wine would exceed a threshold for "high in added sugar" comparative to other foods, due to the small volumes allowable. For these reasons, Option 5 would have no impact on wine products, as they would not be included in such a category.

Please attach references here:

No file was uploaded

Not Answered

#### 16 Impact on existing elements of a food label

How would the proposed option impact existing elements of a food label (both mandatory and voluntary)?:

Would adopting this option require another element of a food label to be removed from the package? :

If so, which labelling elements would be removed?:

Please provide evidence to justify your response. :

Please attach references here:

No file was uploaded

Not Answered

## 17 Implementation mechanism

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

## Option 6: Pictorial approaches to convey the amount or types of sugars in a serving of food.

### 18 Effectiveness, strengths and weaknesses of this option

How effective would this option be in addressing the policy issue and achieving the desired outcome?:

Not effective

Please provide evidence to justify your views. :

Pictorials or images to display measures of sugar in food could create more confusion. This option does not provide any more contextual information that consumers would understand than current NIP and may result in detracting from more important health and safety information such as allergen information. The costs to industry associated with inclusion of pictorials on packaging is also significantly more than other alternatives. It is apparent from the consultation paper that this option has also not been taken up by other countries, as it has been considered both costly and ineffective.

Please attach references here:

No file was uploaded

Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:

Please provide evidence to justify your views. :

Please attach evidence here:

No file was uploaded

Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:

Please describe what these are?:

Please attach references here:

No file was uploaded

Not Answered

## 19 Impacts

How would this option impact you? :

Not at all

Please provide impacts and cost relevant to you, with evidence to justify your response.:

As there is rarely sugar remaining in the final wine product, this option does not make sense for wine and therefore, wine should remain an exempt product. As such, the option would have minimal impact.

Please attach references here :

No file was uploaded

Not Answered

## 20 Impact on existing elements of a food label

How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? :

Would adopting this option require another element of a food label to be removed from the package? :

If so, which labelling elements would be removed?:

Please provide evidence to justify your response. :

Please attach references here:

No file was uploaded

Not Answered

## 21 Implementation mechanism

**Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:**

Voluntary implementation

**Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:**

NA - WFA support the status quo in conjunction with government led, targeted education (option 2). WFA does not support option 6 and in this context none of the options in table 1 are relevant. However voluntary initiatives are generally the most favourable.

**Please attach references here:**

No file was uploaded

Not Answered

## Option 7: Digital linking to off label web-based information about added sugars content

### 22 Effectiveness, strengths and weaknesses of this option

**How effective would this option be in addressing the policy issue and achieving the desired outcome? :**

No opinion

**Please provide evidence to justify your views. :**

Whilst voluntary off-label initiatives are generally preferable it is unclear to us how effective this option would be in addressing the proposed problem.

**Please attach references here:**

No file was uploaded

**Is the description of the strengths and weaknesses of the proposed option (compared to the status quo) accurate?:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Are there additional strengths and weaknesses associated with the proposed option (compared with the status quo)?:**

**Please describe what these are?:**

**Please attach references here:**

No file was uploaded

Not Answered

### 23 Impact

**How would this option impact you? :**

Not at all

**Please provide impacts and cost relevant to you, with evidence to justify your response.:**

NA

**Please attach references here:**

No file was uploaded

Not Answered

### 24 Impact on existing elements of a food label

**How would the proposed option impact existing elements of a food label (both mandatory and voluntary)? :**

**Would adopting this option require another element of a food label to be removed from the package? :**

**If so, which labelling elements would be removed?:**

**Please provide evidence to justify your response. :**

**Please attach references here:**

No file was uploaded

Not Answered

## 25 Implementation mechanisms

Referring to Table 1 in Section 3 of the Consultation paper: "Characteristics of the proposed implementation mechanisms", which implementation mechanism would be most appropriate for this policy option?:

Voluntary implementation

Please provide pros and cons of your selected implementation mechanism, using evidence to justify your response.:

Refer to Q22

Please attach references here:

No file was uploaded

Not Answered

## Survey Questions 26-30 (on all proposed policy options)

26 Are there additional options that should be considered to address the policy issue and achieve the desired outcome?

Not Answered

If yes, please describe your suggested option and how it addresses the policy issue.:

Please provide evidence to justify your response.:

Please attach references here:

No file was uploaded

Please also describe the cost of implementing your proposed option.:

Please provide evidence for costing assumptions.:

Please attach references here:

No file was uploaded

Not Answered

27 Is the description of the strengths and weaknesses of the proposed options (compared to the status quo) accurate? THIS QUESTION HAS BEEN INCLUDED IN QUESTIONS: 5,7,10,14,18, AND 22

28 Are there additional options that should be considered to address the policy issue and achieve the desired outcome?THIS QUESTION HAS BEEN INCLUDED IN QUESTIONS 5,7,10,14,18, and 22

29 If you proposed a different option at question 26, please detail the strengths and weaknesses of your proposed option, compared with the status quo.

If you proposed a different option at question 26, please detail the strengths and weaknesses of your proposed option, compared with the status quo. Please provide evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

30 Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?  
- Option 3 - Change to statement of ingredients:

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?  
- Option 4 - Added sugars quantified in NIP:

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?  
- Option 5 - Advisory labels for foods high in added sugars:

Should the proposed options apply to all packaged foods in the Australian and New Zealand food supply, or only particular foods or food categories?  
- Option 6 - Pictorial approaches to convey the amount or types of sugars in a serving of food.:

If you have selected particular foods or food categories in the question above, please specify which foods or food categories where the option should apply. Please provide evidence to justify your response.:

Please attach references here:

No file was uploaded

Not Answered

## Implementation mechanisms

**31 Is the description of the pros and cons of the different implementation mechanisms in Table 1 accurate? (Table 1: "Characteristics of the proposed implementation mechanisms").**

**Voluntary:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Code of Practice - Voluntary:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Code of Practice - Government driven:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

**Regulatory:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

Not Answered

**32 Are there other pros and cons associated with the different implementation mechanisms?**

**Voluntary - are there other pros and cons?:**

**Voluntary: If yes, other pros and cons associated with this mechanism.:**

**Please attach references here :**

No file was uploaded

**Code of Practice - Voluntary: are there other pros and cons?:**

**Code of Practice - Voluntary: If yes, other pros and cons associated with this mechanism.:**

**Please attach references here:**

No file was uploaded

**Code of Practice - Government driven: are there other pros and cons?:**

**Code of Practice - Government driven: If yes, other pros and cons associated with this mechanism.:**

**Please attach references here:**

No file was uploaded

**Regulatory: are there other pros and cons?:**

**Regulatory: If yes, other pros and cons associated with this mechanism:**

**Please attach references here:**

No file was uploaded

Not Answered

### **Impact analysis (costs and benefits)**

**33 Are there any other benefits or costs associated with the proposed labelling options which have not been identified?**

Not Answered

**If yes, please provide details here, using evidence to justify your response.:**

**Please attach references here:**

No file was uploaded

Not Answered

**34 Should there be exemptions or other accommodations (such as longer transition periods) made for small businesses, to minimise the regulatory burden?**

Not Answered

**If so, what exemptions or other accommodations do you suggest? Please justify your response.:**

**Please attach references here:**

No file was uploaded

Not Answered

**35 What would be the cost per year for industry to self-regulate (e.g. voluntary code of practice-industry driven)?**

**What would be the cost per year for industry to self-regulate. Please justify your response with hours of time, and number of staff required.:**

**Please specify which country (Australia or New Zealand) your evidence is based on.:**

**Please provide evidence to justify your views. :**

**Please attach references here:**

No file was uploaded

Not Answered

**36 Would industry pass any of the costs associated with implementing the proposed options on to consumers?**

**Would industry pass any of the costs associated with implementing the proposed options on to consumers?:**

**What is the basis for your view?:**

**Please attach references here:**

No file was uploaded

Not Answered