



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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**Submission to Food Standards Australia New Zealand on
P271 FSANZ: Liqueur Definition**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 41 nationally organised societies. It has 33 branches throughout the country attended by representatives of those societies. The Council's function is to serve women, the family and the community at local, national and international levels through research, study, discussion and action.

NCWNZ is pleased to have the opportunity of making a submission on the Liqueur Definition as for the last 108 years it has passed well in excess of 50 Resolutions concerning alcohol at its Conferences and has taken part in the writing of many submissions. In 1982 a Resolution was passed:

"That NCWNZ support the labelling of all alcoholic drinks so that the public may be advised of the health hazards and contra indications of alcohol consumption," and again in 1995:

"That NCWNZ, recognising that foetal alcohol syndrome is an important health issue request the Minister of Health to:

- a. ensure that up-to-date public health information is available and widely disseminated to the public and health professionals;
- b. make it mandatory for all alcoholic beverages to carry appropriate warning messages."

Our membership is still convinced of this need today.

5. RELEVANT ISSUES

5.1 INTENT OF CODE WITH RESPECT TO 'READY-TO-DRINK' (RTDs) PRODUCTS

5.1.2.1 Minimum alcohol content for liqueur

We believe that there is a need to provide a clear classification so that there can not be any loopholes found, and which will help to ensure consistent interpretation and application of the Code's provisions by manufacturer, enforcement agencies and consumers. This should include a minimum alcohol content of 15% alcohol by volume (abv).

5.1.2.2 Separate definition for RTDs in the Code.

NCWNZ believes that there is no need to provide a separate definition for RTDs because they are made from foods that are already regulated in the Code. RTDs are not Liqueurs and should not have labelling exemptions.





5.1.2.3 Ethanol content of liqueurs to be derived only from a spirituous ingredient

Our members understand that the food standards in Australia and New Zealand have considered the need to regulate the Ethanol content of liqueurs but decided that there were no public health or safety concerns and so regulations are not needed. We feel that this regulation needs to be forward thinking and state the maximum ethanol content to cover any future changes.

5.2 INGREDIENT LABELLING OF RTDS

NCWNZ members would like to see all products containing alcohol stating the abv content. We would like this to be taken further with a warning of the dangers of alcohol, similar to those on cigarette packets, on each label. This would be in line with our long-held policy.

5.3. PERCENTAGE LABELLING OF RTDS

We would like to see all products containing alcohol to be labelled with the abv.

5.4 NUTRITIONAL INFORMATION LABELLING OF RTDS

Our membership would agree with the addition of the Nutritional Value of contents on the label, but we would not want this to be used in any way to suggest or promote that drinking alcohol has nutritional value.

5.5 COSTS OF LABELLING CHANGES

NCWNZ would agree that many food industry sectors have had to bear the costs of label changes to bring them into line with the present day requirements, and feel that the liquor industry should not be exempt on the grounds of additional costs.

6. REGULATORY OPTIONS

We would like to see option 2 “Amend the code to clarify which alcoholic beverages should be considered as ‘liqueurs’,” become the regulation.

9. CONCLUSION AND RECOMMENDATION

Our membership would agree that there is a need for “a revised definition of ‘liqueur’, which specifies a minimum alcohol content of 15% alcohol by volume.”

We would agree with the reasons given:

- Provide a clearer definition for ‘liqueur’ which will help to ensure consistent interpretation and application of the Code’s provision by manufacturers, enforcement agencies and consumers;
- Improve the provision of adequate information relating to food to enable consumers to make informed choices by requiring ingredient, percentage and nutrition information labelling for all alcoholic beverages that are not defined in the present code.
- Promote consistency between domestic and international food standards regulating liqueurs; and
- Promote fair trading in food by improving certainty for alcoholic beverage manufacturers, importers and distributors by clarifying which beverages are considered to be liqueurs.

We again would thank you for the opportunity to record our member’s views on these proposed variations to the code, and look forward to these changes take place.

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National President

Christine Rattray
Convener, Social Issues Standing Committee