



**Submission to the Joint Standing Committee on Treaties consultation on the World Wine Trade Group agreement on requirements for wine labelling**

**About CHOICE**

CHOICE exists to unlock the power of consumers. Our vision is for Australians to be the most savvy and active consumers in the world.

As a social enterprise we do this by providing clear information, advice and support on consumer goods and services; by taking action with consumers against bad practice wherever it may exist; and by fearlessly speaking out to promote consumers' interests – ensuring the consumer voice is heard clearly, loudly and cogently in corporations and in governments.

To find out more about CHOICE's campaign work visit [www.choice.com.au/campaigns](http://www.choice.com.au/campaigns).

**Comments**

CHOICE appreciates the opportunity to provide the following comments to the Joint Standing Committee on Treaties consultation on the World Wine Trade Group agreement on requirements for wine labelling.

Previous communication from CHOICE a number of years ago indicated that it would potentially support the proposal to remove the requirements for the volume to be declared in the principle display panel when it is 750ml. However, on further consideration of the consumer implications of such a move, we are now of the view that there should be no exemptions for declaring volume on the principle display panel.

CHOICE objects to the ratification of the agreement for the following reasons:

- a) The change would deprive consumers of important product information needed to make an informed choice. Removing the requirements to declare volume on the principle display panel would mean that consumers will have to pick up and handle products if they wanted to find out the volume of a bottle.
- b) In the absence of a requirement for unit pricing on alcoholic beverages, net weight information is important as consumers need to compare value for money, particularly as there is variation of bottle sizes and shapes that make it difficult for consumers to make an accurate comparison of volume by visual inspection alone. However, should unit pricing be introduced for alcoholic beverages, it will be equally, if not more important that consumers can access volume information on the principle display panel.

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- c) Similar to other packaged goods, there is variability in package sizes offered by different companies, and manufacturers can introduce new innovative bottle designs and change the volume of their products at the same time. This is not always obvious to consumers and we often hear from unhappy consumers when this happens as they see it as an underhanded attempt to increase profits by reducing pack size whilst charging the same price e.g. when a soft drink company introduced new 'ergonomic' bottles they reduced the volume of the bottles but did not reduce the price.
- d) CHOICE believe that alcohol products should at minimum have similar labelling requirements as other food and beverage products and we have raised this in our recent submission to the Review of Food Labelling Law and Policy, particularly with respect to nutrition information and ingredients lists.
- e) Internationally, food manufacturers are accustomed to requirements that they meet the specific labelling standards of exporting countries. This is just a factor of doing business internationally. We see no reason why the wine industry should be exempt from these requirements.
- f) Removing the requirement to have the volume listed on the principle display panel is inconsistent with existing labelling requirement for foods and non-alcoholic beverages. The ramifications of granting exemptions to the wine industry is likely to have flow on effects to other food and beverage products, with other segments of the industry seeking exemption for similar reasons.
- g) There was insufficient consultation with consumers and consumer groups, and we are not aware of research with Australian consumers that was done to inform the proposed changes.

Once again, CHOICE appreciates the opportunity to comment on the ratification of the World Wine Trade Group agreement on requirements for wine labelling and confirm that we do not support the ratification of the agreement while it allows for the volume to be listed anywhere other than the principle display panel.