



19 September 2025

The Hon Stephen Jones MP
Assistant Treasurer
Treasury

Dear Assistant Treasurer

Spirits & Cocktails Australia (SCA) is the peak body for major spirits manufacturers operating in Australia, working to promote a safe and vibrant spirits industry reflecting Australia's maturing drinking culture that creates opportunities for sustainable growth and economic development.

SCA welcomes the opportunity to provide feedback to the Australian Government on options to strengthen the Unit Pricing Code.

The Australian spirits industry is firmly of the view that the current arrangements for alcohol products under the Code should remain. Our view is that Clause 9 covering Exemptions for particular grocery categories, that specifies that alcoholic beverages are an exempt grocery item should remain.

As the ACCC states, while unit pricing provides important information to consumers, *"it wouldn't make sense to require unit pricing for every type of product, some type[s] of products don't require unit pricing"* and this includes alcohol products.

The existing exemption reflects the specific product and packaging requirements of alcohol products, as well as the operation of other codes and regulations on alcohol products that offer information and protection to consumers.

Firstly, under the National Trade Measurement Regulations, "Beer, spirits etc must be sold by reference to volume". This usually involves using an NMI-approved spirit measure, volume statement is a mandatory labelling requirement specifying the total amount of liquid in the bottle.

In addition, all alcohol products must display a statement of alcohol content as a percentage of alcohol by volume (ABV) is required for beverages with more than 1.15% ABV and all packaged beverages containing more than 0.5% ABV must state the number of standard drinks the package contains.

As well as the content information, specific pregnancy warning label must be displayed on beverages containing more than 1.15% ABV and labels must include the name and address of the

supplier and a statement of ingredients.

SCA also notes that the key driver for the review of the Code is the problem 'shrinkflation' with the PM announcing that *"The Albanese Government is taking action to fight shrinkflation in our supermarkets and retail sector by strengthening the Unit Pricing Code to make it easier for Australians to make accurate and timely price comparisons"* (2 October 2024).

As outlined above, there are already significant obligations and requirements on alcohol products that mitigate against shrinkflation in alcohol products sold in Australia.

The Australian spirits industry supports the existing legislation and regulations that provide significant protections for consumers of alcohol products and given the existing packaging and labelling rules and requirements, we do not believe that there is any requirement to alter or amend the existing exemption for alcohol products under the Unit Pricing Code.

Yours sincerely

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