



Submission to Food Standards Australia New Zealand – Application A1256

Colour of pregnancy warning labels for corrugated cardboard packaging

10 November 2022

Alcohol Action Ireland is the independent national advocate working to reduce harm from alcohol.

We campaign for the burden of alcohol harm to be lifted from the individual, community and State and have a strong track record in effective advocacy, campaigning and policy research.

We are pleased to have an opportunity to provide feedback on the application to amend the Australia New Zealand Food Standards Code: Printing requirements for corrugated cardboard outer packaging.

For any queries on this submission, please contact:

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The Australia New Zealand Food Standards (FSANZ) Code (the Code) was amended in July 2020 to include pregnancy warning labelling on packaged alcohol products. This followed decades of advocacy from public health professionals and families with direct experience of Fetal Alcohol Spectrum Disorder (FASD) – a serious, life-long neuro-developmental condition which is entirely preventable if pre-natal exposure to alcohol does not occur.

Ireland has very high levels of FASD, estimated at the third-highest rate globally at 47.5 per 1,000 population.¹ As in Australia and Aotearoa New Zealand this very hidden harm from alcohol is not widely recognised but puts an enormous burden on health and social care services in addition to the devastating impact on individuals and families.

Health information labelling on alcohol products is an important step in raising awareness of this issue. Such labels have been provided for in Irish legislation² which is in the process of being implemented. These labels include a pregnancy warning with text and a pictograph. In a manner similar to the Code, the Irish labelling uses the colour red to emphasise the danger and to draw attention to the warning.

Proposed amendment to the Code

We understand that FSANZ is proposing that the warning label on corrugated cardboard containers (CCCs) be in all black and the size of the label be increased by 25%.

We strongly support the position of public health advocates such as Alcohol Healthwatch that best practice requirement for pregnancy health warning labelling should be maintained. We share concerns that the proposed amendments in relation to labelling on CCCs while making the warning label bigger, that the lack of colour will reduce the visibility and therefore the effectiveness of the label.

FSANZ's own research³ shows that colour and text are critical to the warning being seen and understood and, because most people do not search for warnings, they must be presented in a way that is likely to attract attention in order to be effective.

We strongly recommend that colour should be maintained and increasing the margins of the label to mitigate the blurring issues is the best way forward. This may lead to increased costs of printing. However, alcohol producers can pass on this cost to consumers as is done with other printing costs which relate to the marketing of the product.

Public health advocates in Ireland have noted and commended the FSANZ progress in relation to alcohol labelling with pregnancy warnings despite the determined efforts of the alcohol industry to water down and delay these labels over the past decade. Similar efforts to downplay the risks from alcohol are clear from industry efforts in relation to Irish legislation on labelling. See for example industry submissions to the European Commission TRIS consultation process on alcohol health

¹ [Lange, Shannon](#) and [Probst, Charlotte](#) and [Gmel, Gerrit](#) (2017) Global prevalence of fetal alcohol spectrum disorder among children and youth: a systematic review and meta-analysis. JAMA Pediatrics, 171, (10), pp. 948-956. [10.1001/jamapediatrics.2017.1919](https://doi.org/10.1001/jamapediatrics.2017.1919).

² Public Health (Alcohol) Act 2018 <https://www.irishstatutebook.ie/eli/2018/act/24/enacted/en/html>

³ <https://www.foodstandards.gov.au/code/proposals/Documents/P1050%20Approval%20Report.pdf>

labelling.⁴ We are acutely aware of the well-funded, co-ordinated efforts of the global alcohol industry to obfuscate the harms of their product and to frustrate the modest public health measures to try to reduce these harms. For example, in submissions to the World Health Organisation's consultation on the development of the Global Alcohol Action Plan 65% of industry submissions objected to recommendations on health warning labelling.⁵

Any dilution of the FSANZ alcohol warning labels is likely to lead to pressure on other jurisdictions to amend their health information labelling.

We urge FSANZ to resist any attempts to reduce the effectiveness of these hard-won labels and to put public health concerns above vested interests.

⁴ [https://ec.europa.eu/growth/tools-](https://ec.europa.eu/growth/tools-databases/tris/index.cfm/en/search/?trisaction=search.detail&year=2022&num=441&mLang=EN)

[databases/tris/index.cfm/en/search/?trisaction=search.detail&year=2022&num=441&mLang=EN](https://ec.europa.eu/growth/tools-databases/tris/index.cfm/en/search/?trisaction=search.detail&year=2022&num=441&mLang=EN)

⁵ [Dwyer, Robyn](#) and [Room, Robin](#) and [O'Brien, Paula](#) and [Cook, Megan](#) and [Gleeson, Deborah](#) (2022) Alcohol industry submissions to the WHO 2020 Consultation on the development of an alcohol action plan: a content and thematic analysis. Foundation For Alcohol Research and Education.