

IAR - A576 Labelling of Alcoholic Beverages with a Pregnancy Health Advisory Label

This response is provided on behalf of the Department of Human Services Victoria (DHS).

The DHS supports the progression of the Application. The DHS is satisfied with the list of issues to be addressed via the risk assessment and risk management process, including the impact analysis, to be undertaken by Food Standards Australia New Zealand (FSANZ) in the preparation of the draft assessment report. DHS is pleased to note that FSANZ intends to consider the effectiveness and cost-benefit of other non-regulatory options in the next assessment phase of the application.

DHS believes that it is appropriate that in preparing the draft assessment report, FSANZ plans to consider the revised guidelines of the National Health and Medical Research Council (NHMRC)-*Australian Alcohol Guidelines for Low-risk Drinking*, which is due for release in mid 2008.

DHS recommends that FSANZ also considers the concurrent extension of health advisory statements to the sale of unpackaged liquor (retail premises serving alcoholic beverages as part of this application).

In response to the 15 questions raised for public comment by FSANZ in Attachment 1 of the Initial Assessment Report (IAR)¹, DHS makes the following comments:

- Questions 1 & 2 regarding programs and information in Australia or New Zealand advising women planning a pregnancy or pregnant women of the risk of consuming alcohol:

The DHS Drugs Policy and Services Branch has sponsored the development of an educational resource kit that is visually oriented that provides information on alcohol, drugs and diet during pregnancy, specifically for the Koori community in Victoria. The resource consists of two parts, one for the health practitioner to use as an education tool during the session with the client and another one of similar content and presentation for the woman to take with her entitled: **Healthy Pregnancies Healthy Babies for Koori Communities**. The tag line of "our community, our responsibility" takes a wide approach to protecting pregnant women against the harms of substance use and poor diet. In addition to the resource kit, a literature review for the project was conducted and released.

- Question 12 regarding what percentage of alcohol by volume should be used to determine which alcoholic beverages are to carry an advisory statement if required: The DHS considers that any product that is defined in *Standard 2.7.1 –Labelling of Alcoholic Beverages and Food Containing Alcohol* it should carry the health advisory statement should this application be approved.
- DHS believes that many of the other remaining questions will be answered in an forthcoming DHS Drugs Policy and Services Branch commissioned report- **Informational and warning labels on alcohol containers, sales places and advertisements: experience internationally and evidence effects**, Claire Wilkinson and Robin Room, AER Centre for Alcohol Policy Research, Turning Point Alcohol & Drug Centre. The report will be provided to the FSANZ when it has been finalised.

¹ www.foodstandards.gov.au/_srcfiles/A576_IAR_Alcohol_labelling_FINAL.pdf