

SUBMISSION

CEEV comments to application A576: labelling of alcoholic beverages with a pregnancy health advisory label

Submitter

CEEV (Comité Européen des Entreprises Vins)
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The CEEV “Comité Vins” (*European Committee of Wine Companies*) is the representative body of the EU industry and trade in wines. Its membership includes 23 national associations from 16 EU countries.

We welcome the opportunity given by the FSANZ to comment on the initial assessment report on labelling of alcoholic beverages with a pregnancy health advisory label (application A 576).

General comments

The CEEV shares the goal of the FSANZ of providing consumers with meaningful information. In particular, we agree that alcohol consumption during pregnancy may create health risks for the mother and the future child. There needs to be public policies to avoid such risks. However, we believe that labelling schemes are not the most appropriate vehicle to tackle this problem, for the reasons set out in our detailed comments. Generally speaking, we believe that any labelling requirement for wine should be based on the following principles:

- Labelling is an important, but not exclusive, tool to provide consumers with necessary and useful information to enable them to make safe choices. However, for the sake of proportionality and efficiency, it is appropriate to question for each area of information potentially concerned whether labels are actually the most appropriate route for communicating particular information or whether possible alternative means would be equally valid or preferable.
- Labelling is an important communication tool for operators to present their products to the consumers. Labelling rules must allow a pro-competitive market environment in which dynamic, efficient, innovative operators can make full use of the power of labelling to sell their products without prejudice to full respect of consumer protection.
- In addition to this, the CEEV would like to stress the importance of preventing different approaches and rules for wine labelling that would erect unnecessary burdens on international trade, given the existence of analogous labelling requirements in other nations. It is important to seek for harmonisation of wine regulations, including nutritional information requirements, among the major producing countries/regions of the world.

For that reason, CEEV strongly suggest that this issue should also be tackled within the framework of the Wine Agreement between the EU and Australia and New Zealand.

Detailed comments

1. What other strategies or programs are there in Australia or New Zealand (initiated by industry, public health, government, and consumer groups) to advise women of childbearing age of the risk of consuming alcohol when pregnant or if planning a pregnancy?
2. What information (from industry, public health, government and consumer groups) is available to women planning a pregnancy or pregnant women, about the risk of consuming alcohol?
3. What published and unpublished information is available that may provide answers to the risk assessment questions regarding FASD that will be addressed at Draft Assessment?
4. What other data are available regarding alcohol consumption by women of childbearing age and during pregnancy in Australia and New Zealand?
5. Are there any other data available on the incidence of FAS/FASD in Australia or New Zealand?
6. Are there any other data available relating to the level of awareness amongst women of childbearing age of the risk of consuming alcohol when planning to become pregnant and during pregnancy in Australia and New Zealand?
7. **Do you think a health advisory statement about the risk of consuming alcohol when planning to become pregnant and during pregnancy on all alcoholic beverage containers should be required? Why/why not?**

It should NOT be required, since warning messages in the labels are ineffective to reduce alcohol related misuse or abuse.

Providing citizens with relevant and accurate information to allow them to make responsible decisions is a key element for the efficient prevention of problems related to alcohol abuse and/or misuse. Labelling is an important, but not exclusive, tool to provide consumers with necessary and useful information to enable them to make safe, healthy and sustainable choices.

But health warning messages in the labels are NOT appropriate as an effective proportionate communication tool to provide this information and to prevent alcohol abuse and/or misuse.

Research¹ has shown that warning labels are not effective as such in changing behaviour. When combined with other information tools and methods, warning labels might be effective in increasing awareness of the phenomenon among some consumers, but they are NOT effective as such in changing behaviours or reducing levels of consumption, and they are completely ineffective in reaching those who misuse or abuse.

All scientific studies confirm the pointlessness of warning labels on bottles. At the very most, they agreed that labels could be a tool for providing information but it would be the least effective of all such information tools. Education is deemed to be essential key in reducing alcohol related misuse.

8. What further evidence is available about the use and/or effectiveness of a health advisory statement on alcoholic beverage containers regarding the risk of consuming alcohol when planning to become pregnant and during pregnancy?

See comments to point 7.

9. What wording for a statement about the risk of consuming alcohol when planning to become pregnant and during pregnancy would be appropriate on an

3 A non exhaustive list of scientific research on the subject:

- Groupe de Recherche sur les Aspects Sociaux de la Santé et de la Prévention (GRASP) de l' Université de Montréal (2005), "Analyse de l'efficacité des étiquettes de mise en garde sur les méfaits lié à la consommation abusive d'alcool", Educ'Alcool;
- Andrews J.C. (1995). "Effectiveness of alcohol warning labels: A review and extension". American Behavioral Scientist;
- Hankin JR, Firestone IJ, Sloan JJ et al. (1996). "Heeding the Alcoholic Beverage Warning Label during pregnancy : Multiparae versus Nulliparae". Journal of Studies of Alcohol;
- Stockley C. S. (2001). "The effectiveness of strategies such as health warning labels to reduce alcohol-related harms – an Australian perspective". The International Journal of Drug Policy 12;
- MacKinnon DP (1995). "Review of the effects of the alcohol warning label". Drug and Alcohol Abuse Reviews, Ed: Watson RR (Humana Press Inc, Totowa, NJ).
- Andrews JC, Netemeyer RG and Durvasula S (1991). "Effects of consumption frequency on believability and attitudes toward alcohol warning labels". J. of Public policy and Marketing;
- Andrews JC, Netemeyer RG and Durvasula S (1991). "Believability and attitudes toward alcohol warning label information: the role of persuasive communications theory";
- Scammon DL, Mayer RM and Smith KR (1991). "Alcohol warnings: How do you know when you have had one too many?". J. of Public policy and Marketing.

alcoholic beverage container to raise awareness in pregnant women and women planning to become pregnant?

In order to prevent unnecessary barriers to international trade, it should therefore be possible to provide the requested information using readily comprehensible symbols, such as pictorial symbols.

We would also strongly support a mutual recognition that would exempt from this compulsory labelling scheme those products that are lawfully marketed in other countries and that provide an equivalent level of information to consumers.

10. What further evidence is relevant to the wording of such a statement, such as its likely effectiveness or appeal to women of childbearing age and/or understanding of the statement by women of childbearing age?

11. What are the advantages and disadvantages of a written statement compared with a pictorial image for conveying the risks of consuming alcohol when planning a pregnancy and during pregnancy?

See our comments to question 9.

12. What percentage of alcohol by volume should be used to determine which alcoholic beverages are to carry an advisory statement, if required?

What is the likely impact on consumers, industry, and/or government if the *status quo* was maintained?

13. What is the likely impact on consumers, industry, and/or government if an advisory statement on the risks of consuming alcohol when planning a pregnancy and during pregnancy is required on alcoholic beverage containers?

International trade would be adversely affected. CEEV would like to stress the importance of preventing different approaches and rules for wine labelling that would erect unnecessary burdens on international trade, given the existence of analogous labelling requirements in other nations. It is important to seek for harmonisation of wine regulations, including nutritional information requirements, among the major producing countries/regions of the world.

Industry would need to bear the cost of new labels (design, marketing, print, replacement of current labels and possible loss of existing label stocks) in order to match new requirements. The impact of the cost implications related to mandatory health warnings would be higher for the wine sector, which is mainly composed by small and medium enterprises.

CEEV would like to stress the importance to consider the shelf-life of stock when fixing the transition period, as wine products are estimated to be the products most profoundly affected by the change.

14. How would labelling alcoholic beverages compare in terms of effectiveness and cost-effectiveness with other public health measures to inform pregnant women of the risks of alcohol consumption during pregnancy?

For the above mentioned reasons, we would like to express our support to regulatory option 1, under which the *status quo* would be maintained by not amending the Code to mandate the labelling of alcoholic beverages to advise of the risks of consuming alcohol when planning to become pregnant and during pregnancy.

We thank you in advance for taking into consideration the above comments and remain at your disposal, should you need more information.

Yours sincerely,

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CEEV