

**Submission to Proposal P1050 – Pregnancy warning labels on alcoholic beverages**

**A. Name and contact details (position, address, telephone number, and email address):**

Head of Policy  
Rue Archimede 17, B1000 Brussels, Belgium

Twitter: @EUROCAREBRUSSEL

**B. For organisations, the level at which the submission was authorised:**

**C. Summary (optional but recommended if the submission is lengthy):**

European Alcohol Policy Alliance (Eurocare) strongly supports mandatory pregnancy health warning requirements for alcoholic beverages.

The labelling scheme as outlined in Proposal P1050 composes of elements which will supplement and go a step further than some of the already existing labelling schemes. (do you mean other international schemes? Could be worth clarifying)

Eurocare has been advocating for comprehensive labelling for alcoholic beverages for an over a decade at European and also international levels. To find out more please visit: [www.eurocare.org](http://www.eurocare.org)

Based on the evidence to date and experiences from other public health areas, Eurocare would like to especially complement the FSANZ for inclusion of both the pictogram and warning text in a box prescribed in red, white and black.

However, we would like to point out to several areas where improvements should be made to reach the full potential of this proposal (as stated on page 4 of the Call for submissions - Proposal P1050).

1. Size of the containers should not be the determining factor regarding the type of messaging provided. We would suggest:

- Harmonising requirements for all alcohol products (<100 ml) to carry both a pictogram (9 mm) and a warning text (3 mm).

2. Messaging regarding the risk of drinking during pregnancy, as stated in the proposal document, should be clear. To that end, to ensure consistency and avoid misconceptions about the levels of safe alcohol consumption during pregnancy, we would suggest:

- requiring drinks with alcohol of  $\geq 0.5\%$  alcohol by volume (ABV) to follow the health warning text and pictogram.

3. Given the results of consumer testing of warning statements (section 3.1.2.4) and that the current statement (used on a voluntary basis by the economic operators) creates some levels of confusion and does not reflect the current public health advice; we would suggest:

- Shortening the transition period into 12 months

4. Given the comprehensiveness of the measure and its uniqueness compared to other similar provisions across the world, we would suggest:

- Conducting regular evaluation and monitoring to ensure that planned objective is being achieved over time.

### **Comments to specified sections of P1050 Call for Submissions (CFS) report:**

#### **D. Literature review on the effectiveness of warning labels (section 3.1.1 of CFS)**

Eurocare would like this opportunity to share findings on the effectiveness of alcoholic beverages from its work, with the hope that they will prove a useful reference for FSANZ work.

When discussing the effectiveness of labels on alcohol, it should be noted that the most studied experience with alcohol health related labels originates from the United States (US). However, the US health label is fixed rather than rotating, and has not changed since its introduction in 1989. It is a relatively lengthy message which is usually in small and hard to read print.

- Promoting Discussions, Raising Awareness, Changing Attitudes

It has been noted that the US health labels have prompted discussions about the dangers of drinking, steadily increased awareness of the labels, and there is evidence of increased public support for alcohol labelling by the US public following its introduction.

Similarly, pregnant women who saw the labels were more likely to discuss the issue; in addition a 'dose-response' effect was found such that the more types of warnings the respondents had seen (on adverts at point of-sale, in magazines and on containers) the more likely they were to have discussed the issue.

In France comparable results were found in relation to introduction of the pictogram in 2006. A study of public awareness regarding the dangers of drinking alcohol during pregnancy indicated a positive evolution in terms of changing the social norm towards 'no alcohol during pregnancy'.

It could plausibly be argued that where label regulations have been used, there has indeed been a shift towards regarding alcohol as more problematic and heavier drinking has become less 'normalised'.

Furthermore, warning label messages might serve to legitimate a socially challenging intervention, such as stopping pregnant friend from drinking alcohol.

➤ Lessons Learned from Tobacco Labelling

The tobacco labelling experience offers strong evidence that warning labels can be effective, not only in increasing information and changing attitudes, but also in affecting behaviour. Results from the International Tobacco Control evaluation also support the effects of pictorial labelling. At least one-quarter of respondents from all four countries reported that the package warnings had made them more likely to quit.

Cigarette packages warnings have had most critical influence in a more indirect manner, such as by influencing non-smokers to encourage smokers to stop through peer pressure – an important influence of the warnings that might be very difficult to assess.

### **E. Consumer testing of warning statements (section 3.1.2)**

Eurocare would like to suggest that one of the findings of the consumer testing, namely that currently used message creates some levels of confusion, should be a reason for acceleration of the implementation of the government warning.

### **F. Pictogram (section 3.2.2.2)**

Comments incorporated below in section H

### **G. Warning statement (section 3.2.2.3)**

Comments incorporate below in section H

### **H. Design labelling elements (section 3.2.2.4)**

Eurocare to a large extent agrees and welcomes the approach developed for label design in relation to:

- pictogram
- use of the phrase 'HEALTH WARNING'
- warning statement
- box border
- white background on the pictogram and warning label itself
- 3.0 mm of clear space around the label.

We especially applaud the signal words to be in capital letters and care taken to ensure that message stands out from the general design of the label through usage of red, white and black colours.

Listed below are elements which we would suggest improvements to.

1. All alcohol products (<100 ml) to carry both a pictogram (9 mm) and a warning text (3 mm)

Size of the containers should not be the determining factor regarding the type of messaging provided. The guiding logic should be that the content of the container is determining the kind of warning it carries. The strength of different products and the relative risk they carry, is omitted by taking the approach currently in the proposal. For instance, in some countries (i.e. Poland) there is a growing trend of selling hard spirits

in small containers, which leads to more frequent consumption of such drinks. It has been reported that these small containers are often consumed in greater quantities, leading to a 'silent' adaptation of the body tolerances and potential for hazardous drinking patterns. In its current proposal such container (small size spirits bottle) would only be required to carry the pictogram. This would be a missed opportunity to effectively inform target audiences of the harms of drinking alcohol during pregnancy. As pointed out by FSANZ itself following evidence review, the best effect is achieved when pictogram is combined with a health warning.

We would strongly suggest requiring all alcoholic beverages regardless of the size of the container to carry both a health warning and a pictogram. We would like to point out that this would allow to futureproof the legislation for potential developments in the market such as the one mentioned above (trend towards sell of hard spirits in small containers).

Furthermore, we would like to point out, in area of labelling it is regarded that small size of containers does not exempt from providing information to consumers.

In area of nutritional and ingredients labelling containers considered a lot smaller than standard alcoholic beverage containers (i.e. chocolate bar, chewing gum), are providing information required to inform consumers.

## 2. Specification of the orientation of the message

The proposal mentions that no specification of the orientation will be prescribed. We would like to suggest that to achieve best its potential when it comes visibility, a health warning should be:

- Placed in a standard location on the container
- Parallel to the base of the container

As an illustration of the point, below is an example of the US health warning message (vertical to the base of the container, making it difficult to read) and Turkish labels. As can be seen, without a clear indication of the orientation economic producers are choosing orientation (sometimes two different orientations even on the same product) which creates inconsistencies in terms of implementation.



Figure 1: Turkish label on wine



Figure 2: Turkish label on spirits

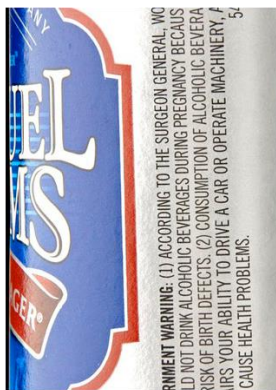


Figure 3: US label on beer

## I. Summary of proposed pregnancy warning label design (section 3.2.2.5)

Please see comments in section H

## J. Beverages to carry the pregnancy warning label (section 3.2.3)

Messaging regarding the risk of drinking during pregnancy, as stated in the proposal document, should be clear. To that end, to ensure consistency and avoid misconceptions about the levels of safe alcohol consumption during pregnancy, we would suggest:

- requiring drinks with alcohol of  $\geq 0.5\%$  alcohol by volume (ABV) to follow the health warning text and pictogram.

## K. Application to different types of sales (section 3.2.4)

No additional comments

## L. Application to different types of packages (section 3.2.5)

Eurocare would like to point out one type of packages, that seems to be unintentionally omitted, namely promotional materials of alcoholic beverages imitating alcoholic containers.

In some countries, industry on a voluntary basis has extended its commitments to include above mentioned items. Including them in the proposal would enhance the number of communication channels to the public and enhance the comprehensiveness of the measure. Below is an illustration of promotional materials that could be considered to be covered by the obligation to include pregnancy health warning.



Figure 4: Beer marketing campaign in Poland

## M. Consideration of costs and benefits (section 3.4.1.1 of CFS)

No comments.

#### **N. Transitional arrangements (section 4.1 of CFS)**

Eurocare would like to suggest minimising the transitional arrangement to 12 months. Experience from other jurisdictions proved that this provides efficient time for industry to adapt (i.e. 10 months was foreseen by Turkey for implementation of 3 warning messages). As pointed out in section 3.1.2.4 current wording appearing on the alcoholic beverage containers is understood by the public in a way which does not reflect the current public health message.

It will be in the public health interest to minimise the existence of the current messaging on the market and shorten the transition period to 12 months.

#### **O. Draft variation to the Australia New Zealand Food Standards Code (Attachment A of CFS)**

No comments.

#### **P. Other comments (within the scope of P1050 – see section 1.5 of the CFS)**

Eurocare would like to suggest that in order to avoid confusion, messages currently used by the economic operators, such as ‘get the facts’, ‘drink responsibly’ ‘enjoy in moderation’ should be forbidden on alcoholic beverages as they would undermine the public health message of not drinking during pregnancy.

Given the comprehensiveness of the measure and its uniqueness compared to other similar ones, across the world, we would suggest conducting regular evaluation and monitoring to ensure that planned objective is being achieved over time. With time, it should also be considered whether to enhance visibility and ensure that health warning is being noticed, messages should vary in style or be supplemented by additional messages regarding health risks. Rotating health warning messages over time have better recall, as consumers could become ‘immune’ to the same label (novelty effect).

#### **About Eurocare**

The European Alcohol Policy Alliance (EUROCARE) is an alliance of non-governmental and public health organisations with around 50 member organisations across 20 European countries advocating the prevention and reduction of alcohol related harm in Europe. Member organisations are involved in advocacy and research, as well as in the provision of information and training on alcohol issues and the service for people whose lives are affected by alcohol problems.

The mission of Eurocare is to promote policies to prevent and reduce alcohol related harm. The message, in regard to alcohol consumption is “**less is better**”.

Eurocare is registered in the European Transparency Register under number: 01546986656-22.