



21 October 2019

Our ref: LH19-429

Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6143

via email: submissions@foodstandards.gov.au

Tēnā koutou katoa,

Pregnancy warning labels on alcoholic beverages

Thank you for giving The Royal New Zealand College of General Practitioners the opportunity to comment on Proposal P1050 – Pregnancy warning labels on alcoholic beverages.

The Royal New Zealand College of General Practitioners is the largest medical college in New Zealand and our membership of 5,400 general practitioners comprises almost 40 percent of New Zealand's specialist medical workforce. Our kaupapa is to set and maintain education and quality standards for general practice, and support our members to provide competent, equitable care to their patients. We do this to improve health outcomes and reduce health inequities.

The College endorses the New Zealand Health Promotion Agency's advice to pregnant women or women trying to get pregnant, which is: "Stop drinking alcohol. There is no known safe level of alcohol use at any stage of pregnancy." We also supported the 2008 proposal to introduce mandatory labels warning pregnant women that consuming alcohol can harm their baby, so we are pleased that this labelling will be implemented soon in both New Zealand and Australia.

We would also like to congratulate Food Standards Australia New Zealand (FSANZ) for providing a comprehensive evidence-base for the proposal's various recommendations. We especially note the consumer research, discussions with Māori and Aboriginal community representatives, and engagement with health professionals and industry in both Australia and New Zealand.

Our submission

The College supports these recommendations in the proposal:

- labelling for beverages containing 1.15% or more alcohol by volume (ABV);
- labelling to include a pictogram as well as a written health warning for containers of 200ml or greater in volume;
- warning labelling to be only the pictogram for containers of up to 200ml in volume;
- the warning to read: HEALTH WARNING Any amount of alcohol can harm your baby;
- a colour scheme of red, black, and white to make the label prominent and to enhance its cautionary message; and
- including warning labels on all layers of packaging, eg: single containers, multipack packaging and packaging enclosing multipacks.

Transition period

The College does not support the proposed two-year transition period for the mandatory pregnancy warning label.

The College instead recommends a shorter transition period of one year, so that important public health messaging can start as quickly as possible to help reduce the incidence of foetal alcohol spectrum disorders (FASD).

The College notes that FSANZ's own research revealed that most packaging companies store label stock for a maximum of four months. We have made a practical assumption that industry would also hold 4 – 6 months supply of printed cans for alcoholic beverages such as beer and premixed drinks.

Based on these stock holdings, we consider a one-year transition period to be enough time for industry to redesign labels and produce new stock, particularly in the fast-moving consumer goods (FMCG) categories.

We hope that you find our submission helpful. If you have any questions, or would like more information, please email us at policy@rnzcgp.org.nz

Nāku noa, nā