



Proposal P1050 – Pregnancy warning labels on alcoholic beverages

Submission to Food Standards Australia New Zealand (FSANZ)

VAADA Vision

A Victorian community in which the harms associated with drug use are reduced and general health and well being is promoted.

VAADA Objectives

To provide leadership, representation, advocacy and information to the alcohol and other drug and related sectors.

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

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

In accordance with its vision of reducing the harms associated with drugs (including alcohol), VAADA is supportive of an evidence-based approach to minimising the harms caused by the consumption of alcohol during pregnancy, particularly Foetal Alcohol Syndrome Disorder (FASD).

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)

No comment.

E. Consumer testing of warning statements (section 3.1.2)

VAADA recognises the value of consumer testing, which focused on the statement to be used in the proposed warning label (**Proposed Label**). However, it is unclear why the statement which achieved the best results during consumer testing was not adopted and used in the Proposed Label.

Consumer testing found that the statement 'Any amount of alcohol can cause lifelong harm to your baby' and 'Any amount of alcohol can harm your baby' were rated the most effective warning statements by participants in the consumer test. Of the two statements, 'Any amount of alcohol can cause lifelong harm to your baby' rated highest. Despite this result, the Proposed Label includes the shorter statement, 'Any amount of alcohol can harm your baby'. It is unclear why the shorter statement has been chosen by FSANZ, rather than the longer statement which achieved better results in consumer testing.

VAADA is concerned that the use of the shorter warning statement, which refers to 'harm' rather than 'lifelong harm', has been selected on the basis that it conveys a weaker message. The shorter statement would appear to minimise the impact of the information seeking to

be conveyed. Accordingly, VAADA seeks clarification as to why FSANZ has adopted the shorter statement.

Nevertheless, VAADA supports the inclusion of a warning statement in the Proposed Label.

F. [Pictogram \(section 3.2.2.2\)](#)

VAADA notes that evidence supports the use of contrasting colours, and the use of the colour red, which best attracts attention and is associated with safety warnings. Accordingly, VAADA supports the use of a black graphic inside a red circle with a diagonal strike-through line.

G. [Warning statement \(section 3.2.2.3\)](#)

As stated in section E, VAADA supports the use of the statement 'Any amount of alcohol can harm your baby'.

H. [Design labelling elements \(section 3.2.2.4\)](#)

VAADA supports the following labelling elements:

- Pictogram located inside a red circle with a red diagonal strike through;
- A warning statement in bold red text which reads, 'HEALTH WARNING'.
- That the warning statement and pictogram appear in a box with a red, white and black border.
- That a 3mm clear space around the border be included

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

FSANZ has created three different labelling categories: under 200mls, 200-800mls, and above 800mls. Under the Proposal, products under 200mls are only required to display the pictogram.

VAADA notes the existing body of evidence which shows that a pictogram is most effective when used in conjunction with text. Accordingly, VAADA recommends that products under 100mls display the pictogram only, rather than the current threshold of 200mls. This would ensure that products like 187ml bottles of wine, which contain 2 standard drinks, display both the pictogram and text.

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

Because there is no safe amount of alcohol consumption during pregnancy, VAADA endorses the advice of FASD experts that warning labels should appear on all products containing 0.05% ABV and higher.

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

Signage conveying the warning that 'Any amount of alcohol can cause lifelong harm to your baby' should be displayed prominently in licenced premises, including sporting clubs and music venues to assist in the promotion of the significant harm reduction measure.

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

VAADA supports FSANZ's proposal that the Warning Label appear on all layers of packaging. It should appear on outer packaging as well as each individual serving contained within the outer packaging.

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

VAADA makes no additional comment in respect of the cost and benefit analysis included in the FSANZ Proposal document, and notes the benefits (both economic and non-economic) in preventing FASD far outweighs the cost of implementing mandatory alcohol labelling.

N. Transitional arrangements (section 4.1 of CFS)

VAADA opposes FSANZ's proposal to implement the changes over a two year period. Instead, a 12 month transition period is more appropriate. The public health benefits of preventing FASD should be prioritised, and a two year implementation period would delay these benefits without justification. VAADA considers a 12 month transition period to be reasonable, particularly in light of FSANZ's finding that most labels are stored for a maximum of four months.

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

No comment.

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

Education and awareness

VAADA notes that warning labels alone are not sufficient to change behaviour and raise awareness of the risks of consuming alcohol during pregnancy. In order to achieve maximum benefit and reduce the incidence of FASD, the mandatory labelling scheme must be complemented by a community education campaign funded by the Commonwealth Government.

An education and awareness campaign should include information which provides information about accessing AOD treatment services and resources for people who wish to address problematic alcohol use.

Monitoring and evaluation

VAADA notes the need for a rigorous monitoring and evaluation framework. It is vital that compliance with the mandatory scheme be enforced, and that the effectiveness of the scheme is evaluated. Methods of monitoring and evaluation should be outlined, included the penalty for non-compliance.

Industry guidance

VAADA recommends that guidance for industry as to the implementation of the warning label is made available upon gazettal, to ensure that the industry is able to implement the changes immediately.

VAADA would be pleased to address the above matters further, and VAADA's