

2019-10/008

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Food Standards Australia New Zealand

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By email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

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

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

Di Cookson, Research and Policy Assistant, New Zealand Nurses Organisation (NZNO), PO Box 2128, Wellington 6140,

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

NZNO Tōpūtanga Tapuhi Kaitiaki o Aotearoa welcomes the opportunity to make a submission to Food Standards Australia New Zealand on the above consultation. We have consulted with our Women's Health College, Te Rūnanga, Primary Health Care Nurses and Neonatal Nurses.

**C. Summary:**

NZNO supports the introduction of pregnancy warning labels on alcoholic beverages and applauds that they will be MANDATORY. However, we are strongly supportive of a bilingual warning statement in addition to the warning statement proposed.

We note that some wine makers in NZ are already voluntarily labelling their products; their efforts should be acknowledged. The proposed changes will bring all producers into line now which is a positive outcome for public health. The harm caused in utero from alcohol can lead to health and developmental issues that are life long and impact on an individual's ability to learn and ultimately take their place in society as productive adults.

**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)**

No comment

**F. Pictogram (section 3.2.2.2)**

NZNO's women's health college supports the proposed pictogram as it is simple, clear and "no fuss". The college are of the view that consistency of labelling internationally would be useful and therefore support this pictogram as it is similar to that being used in the UK and Australia.

However, one nurse working in the area of Foetal Alcohol Spectrum Disorder (FASD) believes this pictogram is too understated. She supports a pictogram with a pregnant woman saying no to a glass of wine being offered to her, as below.



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

NZNO's women's health college members support the warning statement "any amount of alcohol can harm your baby". They are of the view that this simple wording will be clear to young mothers with low health literacy. Other suggestions include "zero alcohol for 9 months – its best for your baby", "there is no safe limit for baby", and "don't drink pregnant".

Importantly, NZNO's Māori advisory group Te Rūnanga is strongly supportive of a bilingual warning statement. They state that for vulnerable population groups health messages about risks may only be accessed "at point of sale", perhaps due to the cost of accessing health services and/or antenatal classes. They emphasise this is a health literacy issue and note that there is a growing portion of the population in Aotearoa New Zealand going through Kura Kaupapa schooling for whom Māori is their first language.

An additional suggestion was made for a website link indicating "if you want more information go to this website".

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

NZNO members who were consulted on the warning labels all emphasise the use of bold colour and like the use of red. One nurse working in the area of FASD mentioned that in Canada a strong red border was strongly advocated and thinks this should be used in New Zealand also.

The importance of size of the warning statement was stressed by all nurses consulted. The size should be sufficient that it is clearly visible. All members who provided feedback want the label to be as big as possible so that people notice and read the warnings.

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

NZNO notes there is a 2 year phasing in which is reasonable – given the shelf life of products such as wine already produced and may still be for sale in 2 years. This time frame gives producers enough time to change label designs. We appreciate that there are costs associated with this process, especially for smaller businesses but that we applaud the action to safeguard unborn babies from preventable harm.

**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)**

No comment

We trust the above is useful, and are happy to provide further comment if necessary.

Nāku noa, nā

**About NZNO**

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 52,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements. NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse*.