

## Proposal P1050 – Submission Template

Please use the template below to provide your submission to Proposal P1050 – Pregnancy warning labels on alcoholic beverages. Please submit this to FSANZ as a word document (if required, a pdf of the submission may also be provided in addition to the word document).

For information about making a submission, including what your submission should include, visit the FSANZ website at [information for submitters](#).

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

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

Alcohol Wise Hurunui Incorporated Secrerary , 21 Innes Road  
Amberley

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

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

Alcohol Wise Hurunui Inc is delighted that this FSANZ proposal to have labels warning women 'Not to drink alcohol while pregnant' is finally happening. Especially, as two significant petitions to the New Zealand House of Representatives: namely Petition 1999/36 Christine Rogan and 7,279 others & Petition 2002/99 Shirley Ann Winikerei and 478 others were not successful. Both these petitions called for legislation to make warning labels with the message 'Not to drink alcohol while pregnant' mandatory on all types of alcoholic liquor. We have waited 16 years for these warning labels to protect our children from the harm of fetal alcohol birth defects!

Alcohol Wise Hurunui Inc endorses the FSANZ proposal to now make labeling mandatory on all alcoholic beverage containers, but to be effective we seek that labels are placed on containers with a volume of 100ml and greater.

We recommend that the alcohol industry comply with this mandatory labeling within a more immediate time frame of 12 months- not 2 years.

We recommend that the message is stronger. That underneath the Health Warning & pictogram the wording is... **Any amount of alcohol can cause lifelong harm to your baby.**

We recommend the label is bigger and of a size that can be easily seen.

We wish the labeling to serve as a

- Reminder message: Not to drink alcohol while pregnant.
- Conversation starter.
- Tool for bringing about a cultural change and the normalization of NOT drinking while pregnant.
- Means of educating women with its authoritative, compelling and informative message.
- Means to spread this Harm Prevention Global World Health Organization message .

**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)**

We know that labelling messages work. This is evident in the psychology of branding products.

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

We have been discussing this for 16 years . During this time the FSANZ would have a file of evidence on hand to support that in general warning statements work. To test for the efficacy of a specific warning statement, a trial would need to be run and data collected with respect to defined goals.

**F. Pictogram (section 3.2.2.2)**

Use the pictogram that everyone recognises.

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

We can't delay too many babies are being born damaged by alcohol. This tragic situation is totally preventable. People before profits. PLEASE bring this mandatory warning label 'NOT to drink alcohol while pregnant ' to fruition as soon as possible.

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

Make the label: Clear, Simple. Visible, Big. Make it have visual impact.

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

**Health Warning** plus pictogram & underneath the pictogram the wording  
**Any amount of alcohol can cause lifelong harm to your baby.**

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

Make labelling mandatory on all alcoholic beverage containers with a volume of 100ml or greater.

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

Keep it simple.. the same label applies to all sales of alcohol in a container of 100 ml volume or greater.

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

Keep it simple applies to all packages see above

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

The benefit of doing everything possible to prevent Fetal Alcohol Harm to the next generation and to all yet to be born is immeasurable in terms of funding for disability, health, well being, education, justice etc.... Not to do this is costing individuals, families, communities and societies a burden of harm of unspeakable amounts. The cost is immeasurable! One example of the cost to the justice system is the Wrongful Conviction of FASD victim Teina Poirā.

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

Give 12 months to transition from not labelling to labelling. Alcohol which is exported to America already has labeling not to drink while pregnant.

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

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

He tangata- He tangata- He tangata. It is people, it is people, it is people. No more looking for excuses to NOT protect the next generation from alcohol birth defects. It is absolutely clear alcohol damages the developing fetus. FASD is a lifelong disability. The damage alcohol is causing is immense. Please make labelling mandatory. Let there be fewer babies born victim to alcohol and fewer mothers living with the stigma that they damaged their baby through drinking alcohol while pregnant. May we do everything possible to prevent this.

Thank you so much for the opportunity to provide a submission on this proposal. Alcohol Wise Hūrūnui Inc is greatly encouraged by this proposal and eagerly look forward to it becoming a reality. THANK YOU.