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Mr Mark Booth  
CEO, Food Standards Australia New Zealand  
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Email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)  
Attention: Diane Bourn

Dear Mr Booth

**P1050: PREGNANCY WARNING LABELS ON ALCOHOLIC BEVERAGES**

The Royal Australasian College of Surgeons (RACS) welcomes the public consultation on the proposed standard for the mandatory application of pregnancy warning labels on packaged alcohol products. The mandatory application of clear and effective pregnancy warning labels on all alcohol products is long overdue and strongly supported by RACS.

RACS has a long history of advocacy with relation to reducing alcohol related harm and makes the following points.

1. RACS supports mandatory application of pregnancy warning labels on alcohol products. We believe that consumers have a right to be informed about products that cause harm and that pregnancy warning labels on alcohol products fall within this category. The voluntary scheme has consistently been shown to be insufficient, ineffective, and the coverage is inadequate.
2. RACS supports the choice of colour and contrast for the pictogram but does not support the category at which this is to be applied. RACS supports its members' position that the "pictogram only" (without words) should be applied to products under 100ml because:
  - a. There are numerous alcohol products under 200 ml that already feature a pregnant woman pictogram and/or warning text that is larger than the proposed labels, thus demonstrating there is sufficient space on the label for the full pregnancy label on products over 100 ml.
  - b. The level of risk related to the alcohol by volume (ABV) of the product has not been considered. This creates a situation where small products with a high ABV (such as 100mL of vodka) have a smaller warning than products which are larger by volume but lower in ABV.
3. RACS does not support the creation of a labelling category for products between  $\leq 200$  ml and 800 ml requiring a smaller warning label. The vast majority of alcohol products on the market will fall within the 100 to 800 ml range and thus a full pregnancy warning label of sufficient size should be required on these products
4. RACS does not support a two-year transition timeframe. The need for a two-year transition, rather than the usual 12-month transition period for variations to the Food Standards Code, has not been articulated by FSANZ. Further, evidence from other countries demonstrates that a 12-month timeframe is sufficient for the alcohol industry to implement labelling changes.

We look forward to engaging with FSANZ further on the issue and welcome the mandatory application of warning labels in an expeditious manner.

Yours sincerely

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[REDACTED]  
Rural Representative  
RACS Bi-National Trauma Committee