

Attachment H – 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):

Name:

Position:

Address: 10 Campion Street, Deakin, ACT 2600,

Tel:

Email:

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

Chief Executive Officer

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

Please complete a summary of your submission

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)

The National Rural Health Alliance supports the Foundation for Alcohol Education (FARE) view on the literature review a summarised here:

- There is a lack of detail in the methodology of the literature review and how studies with different study designs were compared with the same quality appraisal method (which is also lacking detail).
- There is the need for clarity as how the literature review has informed FSANZ's decisions and approach. For example, the conclusion of the literature review is that warning text should be 'large.' Yet, despite this recommendation, for two of the proposed warning label categories FSANZ has chosen a text size (2.1mm and 2.8mm) that is smaller than current requirements for other warning texts (3mm) already outlined in the Food Standards Code.
- The National Rural Health Alliance would also like more detail as to who will peer review the document and the timeframe of that review.

E. Consumer testing of warning statements (section 3.1.2)

Findings of the Alcohol Warning Label Survey Report show that a higher proportion of the respondents preferred the warning label 'any amount of alcohol can cause lifelong harm to your baby.' It is the position of the National Rural Health Alliance that further clarification and justification for the choice of the label 'any amount of alcohol can harm your baby' over the longer option of 'lifelong harm' be provided.

F. Pictogram (section 3.2.2.2)

- The National Rural Health Alliance supports the use of Red for the warning label and is supportive of both text and pictogram being mandatory requirements of the warning label.
- National Rural Health Alliance is also supportive of the statements 'HEALTH WARNING' accompanying the pictogram and the text 'Any amount of alcohol can harm your baby'.
- The National Rural Health Alliance has concerns that the size of the pictogram (particularly for products between 200-800mls) is smaller than what is used currently used

G. Warning statement (section 3.2.2.3)

As in E, National Rural Health Alliance notes findings of the Alcohol Warning Label Survey Report that a higher proportion of the respondents preferred the warning label 'any amount of alcohol can cause lifelong harm to your baby.' The Alliance seeks further clarification and justification for the choice of the label 'any amount of alcohol can harm your baby' over the longer option of 'lifelong harm.'

H. Design labelling elements (section 3.2.2.4)

The National Rural Health Alliance's opinion is that the clarity, legibility, size, colour and placement of message and warnings are important. The health warning labels needs to be in a prominent position on alcohol containers. National Rural Health Alliance is therefore supportive of the warning statement using the words 'HEALTH WARNING' and that this appears in red.

The National Rural Health Alliance's supports a 3mm clear space outside the border, and the space should be white.

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

The National Rural Health Alliance notes that the creation of different labelling categories for different alcohol products (by container volume) has not been established or justified by FSANZ within the consultation document.

The National Rural Health Alliance also notes that FSANZ is proposing that products (greater or less than) 200mls are only required to display the pictogram only. The National Rural Health Alliance proposes that this should be reduced this to products 150mls and less

The National Rural Health Alliance agrees that the suggested pictogram diameter size for below 150mls is acceptable and appropriate.

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

The National Rural Health Alliance is supportive of the alignment of the requirement for pregnancy warning labels to products with an alcohol content of $\geq 0.5\%$ alcohol by volume (ABV), thus ensuring consistency with national alcohol guidelines in both Australia and New Zealand that abstinence is the safest option during pregnancy.

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

The National Rural Health Alliance has no further additional information than what has been presented above.

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

The National Rural Health Alliance is supportive of the labelling of outer packaging but seeks clarification on what types of outer packaging that requires only the pictogram would be included.

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

The National Rural Health Alliance agrees with the updated costs and benefits outlined in the consultation document and that the benefits of preventing FASD far outweigh the costs of implementing mandatory warning labels on alcohol products.

N. Transitional arrangements (section 4.1 of CFS)

It is the National Rural Health Alliance's position that a 2 year transition timeframe is not justified, and that a 12-month transition timeframe be implemented, as has occurred in other countries. This will allow sufficient time for the industry to adapt their labelling schemes to comply with the changes to the Code.

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

The National Rural Health Alliance has no further additional information than what has been presented above.

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

National Rural Health Alliance is concerned that the low English proficiency and low health literacy of consumers in rural, remote and regional Australia may interfere with comprehension of the warning label. There is therefore need to outline a clear plan to inform consumers about the changes to the Code and to implement comprehensive evaluation and monitoring, including the development of a comprehensive enforcement and compliance plan.