



Submission to Draft Food Regulatory Measure - Proposal P1050 – mandatory pregnancy warning labels on alcoholic beverages

The State and Territory Alcohol and Other Drug Peaks Network (the Network) welcomes the opportunity to provide a submission on Proposal P1050.

The Network advances and supports alcohol and other drug services in all Australian jurisdictions to prevent, treat and reduce alcohol, tobacco and other drug-related harms to individuals, families and communities.

To enable this we provide expert services in:

- Capacity building
- Sector and workforce development
- Quality improvement
- Education and research
- Information and communication
- Coordination and partnerships
- Information management and data collection
- Representation and consultation
- Program development for State, Territory and Commonwealth governments
- Policy advice for State, Territory and Commonwealth governments.

The Network's position on pregnancy warning labels on alcoholic beverages has been informed by, aligns with, and supports, submissions by Australia's public health advocacy organisations.

A. Name and contact details

Executive Officer

Victorian Alcohol and Drug Association

On behalf of the State and Territory Alcohol and Other Drug Peaks Network

B. Level at which the submission was authorised

State and Territory Alcohol and Other Drug Peaks Network is comprised of all state and territory peak bodies:

- Alcohol Tobacco and Other Drug Association ACT (ATODA)
- Alcohol, Tobacco and other Drugs Council Tasmania (ATDC)
- Association of Alcohol and other Drug Agencies Northern Territory (AADANT)
- Network of Alcohol and other Drug Agencies (NADA)
- Queensland Network of Alcohol and other Drug Agencies (QNADA)
- South Australian Network of Alcohol and Drug Services (SANDAS)
- Victorian Alcohol and Drug Association (VAADA)
- Western Australian Network of Alcohol and other Drug Agencies (WANADA)

C. Summary

No comment.

D. Literature review on the effectiveness of warning labels

No comment.

E. Consumer testing of warning statements

The Network supports the consumer testing that has been undertaken, and the peer review process that is being carried out to support the testing methodology and analysis.

F. Pictogram and G. Warning statement

The Network supports the combination of text and pictogram, noting existing evidence indicating its effectiveness.¹

As informed by research, the Network supports:

- the use of the colours red, black and white for the pregnancy warning labels; and
- the proposed warning statement '*Any amount of alcohol can harm your baby*'.

H. Design labelling elements

The Network shares concerns about labelling requirements raised by Australia's public health advocacy organisations. The Network position is that:

- an effective warning label must comprise a warning statement and pictogram on all products irrespective of size and quantity;
- the proposed warning label size for alcohol beverages must be large enough to ensure the warning statement is legible, attracts attention, and is consistent with the FSANZ Code requirements for warning statements.

¹ Noar SM, Hall MG, Francis DB, et al. Pictorial cigarette pack warnings: a meta-analysis of experimental studies. Tobacco Control. 2016;25:341-354.

The Network supports the 'Health Warning' signal words, and the use of the colour red and capitalisation, given the reasoning provided in the consultation paper.

I. Summary of proposed pregnancy warning label design

No comment.

J. Beverages to carry warning labels

The Network supports the positions of Australia's public health advocacy organisations, in that beverages containing more than 0.5% ABV should contain the pregnancy warning label. This is congruent with the warning statement that any alcohol can cause harm.

K. Application to different types of sales

No comment.

L. Application to different types of packages

The Network supports the FSANZ proposal for the warning labels to be placed on every layer of packaging and on each individual portion pack for beverages with more than one layer of packaging.

M. Consideration of costs and benefits

The Network has no additional comments regarding the cost/benefit assessment, other than to support the concerns raised by Australia's public health advocacy organisations.

N. Transitional arrangements

Consistent with the public health advocacy organisations, the Network believes a 12 month transition period is appropriate, acknowledging the urgent need to redress the history and ongoing harms experienced by the Australian community.

O. Draft variation to the Australia and New Zealand Food Standards Code

No comment.

P. Other comments

The Network represents hundreds of alcohol and other drug treatment and support services across Australia. Alcohol is the primary principal drug of concern for thousands of consumers presenting to these services. The sector services witness the devastation and harm caused by alcohol, and its impact on individuals, families and communities. Alcohol-related harms are preventable. The State and Territory Alcohol and Other Drug Peaks Network calls on the alcohol industry to take responsibility and make every effort to reduce harm.

In principle, the Network supports measures to reduce the harms associated with alcohol use, including the introduction of labels warning against drinking while pregnant or breastfeeding. However the Network believes that:

- it is essential that the label introduction be just one part of a larger comprehensive education and awareness campaign;
- such an education and awareness campaign be independent of the alcohol industry;

- both the larger campaign and labelling introduction aim to inform and support the women who primarily make up the target group and is considerate of their needs and circumstances;
- the initiative must be independently monitored and evaluated to ensure compliance as well as to formally determine the effectiveness of the initiative.

It is also essential that this initiative does not come at the expense of other targeted treatment options and broader community education and support programs. The current Australian AOD treatment is already stretched beyond capacity. A review by the National Drug and Alcohol Research Centre in 2014 found that there is substantial unmet demand within the AOD treatment sector across Australia, with an estimated 200,000-500,000 Australians each year unable to access treatment for problems associated with drug or alcohol use. This study further demonstrates that the funding base from Commonwealth and State governments is not commensurate with population needs and less than half of the people actively seeking AOD services are able to gain access. It is important to note that of what funds are allocated towards minimising the harms associated with AOD use in Australia, a disproportionate amount of 64% is directed to law enforcement while drug treatment only attracts 22%. This is despite international research which has demonstrated that law enforcement is largely ineffective in reducing supply while treatment is highly effective in helping people overcome their drug-related problems.²

² Ritter, A & Berends, L et al, July 2014, New Horizons: The review of alcohol and other drug treatment services in Australia, Drug Policy Modelling Program National Drug and Alcohol Research Centre, UNSW.
Available at:
<https://ndarc.med.unsw.edu.au/sites/default/files/ndarc/resources/New%20Horizons%20Final%20Report%20July%202014.pdf>