

# **Proposal P1050 – Submission to Food Standards Australia New Zealand**

## **Tairawhiti Community FASD Group**

The Tairawhiti Community FASD Group was established in 2018, after professionals and families came together over multiple community hui to discuss the current gaps and potential solutions in regards to Fetal Alcohol Spectrum Disorder awareness, prevention, assessment, advocacy and support. It is a voluntary working group made up from members across several sectors and organisations with a range of skills and experience. This submission is made on behalf of our community working group and does not necessarily represent the views of our organisations.

*We support the majority of Food Standards (Proposal P1050 – Pregnancy warning labels on alcoholic beverages) Variation. We raise the following concerns and recommendations in hope of strengthening the impact of intended improved public health outcomes and to increase the likelihood of a healthy future for our tamariki.*

### **Comments on the P1050 Call for Submissions (CFS) report:**

#### **F. Pictogram (section 3.2.2.2)**

We support the proposed pictogram, because of its current use and recognisable quality.

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

We recommend the use of the alternative statement “any alcohol can cause lifelong harm to your baby.” The use of any alcohol, compared to any amount of alcohol refers not only to the

amount, but is also inclusive of the fact there is no safe type of alcohol. We prefer the use of lifelong, or an alternative such as permanent to inform the public more accurately about the nature of the harm, such as miscarriage, stillbirth and brain injury.

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

We agree with the stated recommendations:

- Use short warning messages and words such as ‘Warning’ or ‘Health Warning’ to indicate it is a warning label
- Warning label be separated from other information such as *enjoy in moderation*, e.g. placed in a box, clear space used around the warning label
- Contrasting colours are used. The colour green should not be used as it can cause confusion while the colour red receives the most attention and is readily associated with being a warning

In terms of the recommendation that:

- Text be readable and possibly the same size as other label information

We agree, that text needs to be readable and visible to be effective so we recommend a larger font size to draw consumer attention towards it.

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

It is outlined that only products with 1.15% ABV and above will be required to have a pregnancy warning label. We assert that products from 0.5% ABV and above should be labelled to ensure consistency with the evidence and the current health message that no alcohol use during pregnancy is the safest option.

We view the proposed size of the labels including font size in the 200–800ml category as inadequate and concerning due to the large proportion of beverages it covers and the growing market of smaller products. Additionally containers over 100mls should carry the full label not just the pictogram image.

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

We agree that all layers of packaging carry the full pregnancy warning label.

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

Instead of the proposed 2 year transition period allowing alcohol industry members to implement alcohol pregnancy warning labels, we are in strong favour of implementing a 12-month transition timeframe, as the longer period will likely delay and compromise health

outcomes for the public. This would mean the mandatory labelling won't be in effect until 2021 and we want to try and cover the 'riskiest' season, being the festive and New Year celebrations. Given the significance and urgency of the health message and the fact that a large portion of stock is sold within a year, we believe 12 months is a fair and balanced expectation. Industry costs are insignificant and incomparable to the cost of human lives and human development.

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

**Education:** We agree that awareness campaigns highlighting the changes will be needed and public health agencies and NGO's can play a role in spreading awareness of the new regulations in collaboration with their other work around raising FASD awareness in the community and Health Professional education activities. However there should be a clear commitment and investment from FSANZ and the government to inform consumers about these changes. Campaigns should not be implemented by the industry due to conflict of interest.

**Monitoring:** We support monitoring and evaluating the impact of the scheme and suggest that this is funded by the government, and from the taxes gained from the sale of alcohol.

**Size and positioning of proposed warning labels:** Overall in principle, we would recommend that all the proposed labels, including pictogram and text size be larger to increase legibility, visibility and effectiveness. We also think that the location and positioning of the label should be mandatory, and not left to the industry to determine, such as is the case in cigarette health warning labelling.

*The Tairāwhiti Community FASD group would like to extend our appreciation to Food Standards Australia New Zealand staff for their comprehensive work in presenting this proposal and for providing an opportunity for consultation. We hope this submission offers a contribution to the positive progress already made and to the future wellbeing of our people.*