

FSANZ Proposal P1050 – Submission

Submission to Proposal P1050 – Pregnancy warning labels on alcoholic beverages

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

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

Not relevant

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

We support the mandatory warning and the direction of the proposals for warning content, but recommend a much larger label than that proposed in Table 10 of the Call for Submissions. Pregnancy warning labels should be clear and non-ambiguous, and include: (i) a pictograph and descriptions of possible harm (ii) guidelines for maximum alcohol intake; and (iii) a source of reliable further information about alcohol and health, such as a government website (eg <https://www.alcohol.org.nz/>).

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 draw your attention to our 2018 article on NZ alcohol labels (Tinawi et al. Highly deficient alcohol health warning labels in a high-income country with a voluntary system. *Drug Alcohol Rev.*2018;37(5):616-626.DOI:10.1111/dar.12814), which was not included in your literature review. In particular, we highlight the need to prevent alcohol marketers from obscuring warning labels by the use of background colours, and the need to prevent ambiguity from the conjunction of warning labels with messages such as 'Enjoy Responsibly' and 'cheers.co.nz.'

E. Consumer testing of warning statements (section 3.1.2)

We agree about the need to avoid any possible ambiguity in warnings, and support the 'Any amount of alcohol can harm your baby' warning.

F. Pictogram (section 3.2.2.2)

We agree about the need for a pictogram to be mandatory, but the minimum size and background are crucial.

G. Warning statement (section 3.2.2.3)

We support 'Any amount of alcohol can harm your baby'

H. Design labelling elements (section 3.2.2.4)

We support front of container warning labels, the use of red colour in the pictogram, and the contrast of black text on a white background.

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

We support an 11mm minimum size for pictograms, regardless of container size. We support a minimum font size for warning text of 9 points for all warnings, regardless of container size, as is required in EU pharmaceutical warning label inserts (European Commission. Guideline on the readability of the labelling and package leaflet of medicinal products for human use. Brussels; 2009. Available at: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-2/c/2009_01_12_readability_guideline_final_en.pdf). We support the 10 point minimum for larger containers, as proposed.

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

We support Option 2 (beverages containing 0.5% ABV or more) as consistent with the wording of the warning text proposed.

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

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

We support the option that all packaging layers be required to carry the warning label so that it would be visible at both the point of sale and point of consumption.

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

We object to an approach that allows avoidable harm to health to be balanced against the size of profits to alcohol marketers. We particularly object to the costs to DrinkWise being used in the calculations, as those costs are outside government control.

N. Transitional arrangements (section 4.1 of CFS)

We support a maximum of one year transition.

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)