



FASD-CAN

Fetal Alcohol Spectrum Disorder Care Action Network

13 November 2022

Application A1256 – Submission from FASD-CAN Incorporated

FASD-CAN Inc is a New Zealand charity which supports individuals with FASD and their carers. It consists of family members and professionals involved in the education, care, treatment and management of these individuals. As such, members of FASD-CAN have vast experience of the lifelong effects of the brain damage caused by prenatal exposure to alcohol. Included in our membership are women who were unaware of the damage caused by drinking during pregnancy and who are now raising children with FASD, including those who received no medical advice to stop drinking. We therefore strongly supported the mandatory requirement for warning labels on alcohol products and are concerned that any subsequent amendments to the pregnancy advisory labelling introduced under P1050 could result in a reduction of effectiveness of warning labelling.

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

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

Chair, FASD-CAN Incorporated

C. Summary

The following points are noted:

- The CFS evaluation states that an increase in size of the warning label in a single colour will compensate for the lack of a red warning label. There is no independent verification that this is the case. The applicant should provide the consumer research addressing the influence of the change in label on awareness..
- There is a lack of independent verification from impartial CC manufacturers on the technical practicality of adapting the printing to permit legible 3 colour printing. All the manufacturers consulted produce packaging for the alcohol industry so can not be deemed to be impartial. An independent consultant should be consulted on this point. Should the variation be recommended for approval, they should also evaluate the feasibility of making the change within the transition period imposed when P1050 was gazetted (i.e. before 31 July 2023.)
- However we consider that, given the time the industry has already had to address the requirement for labelling, a further extension of transition time is unacceptable. The presence of unlabelled packages from 1 August 2023 will dilute the warning message.
- We note the general provisions for legibility in the Code will apply and urge enforcement of this provision to ensure that if any changes are adopted, they do not result in a reduction of the prominence of the warning.
- We recommend more consideration is given to the single colour. Given the consumer evidence presented in P1050 on the importance of red as a warning colour, we recommend the default single colour warning label should be red, with an option of black. The condition around the colour options would be to maximise the contrast against the predominant colour of the packaging. This would mean that red would be used in cases where the colour of the packaging means that red would be more prominent. Although the evidence in the CFS suggested black was chosen to provide contrast against brown, white or grey, the packaging is often multi-coloured and in some cases black labelling may not stand out from background packaging colour. The use of mock ups of both colours with current CC packaging should be used to determine whether the use of a black colour is the optimal choice.


Chair, FASD-CAN