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Food Standards Australia New Zealand
P.O.Box 10559
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New Zealand

"Application A576 – Labelling of Alcoholic Beverages with a Pregnancy Health Advisory Label"

To Whom It May Concern

I wish to endorse the submission made by ALAC to place warning labels regarding the dangers of drinking when pregnant on alcohol containers.

It is reprehensible that a widely available and highly promoted toxic substance currently does not carry health warnings. There is a strong moral and ethical obligation to inform the public about the health risks of alcohol that transcends and outweighs any commercial imperatives or perceived value about the effectiveness of doing so.

In this regard, some of the questions posed by FSANZ to submitters are completely irrelevant.

Irrelevant questions:

Questions 1, 2, 4 & 6 for instance ask about what strategies or information are available to women and what level of awareness women have about the risks of drinking while pregnant. In my opinion, it makes absolutely no difference what other information is available to pregnant women. The risks posed by alcohol to the unborn foetus are so significant that information about the risk needs to be available in as many formats as possible. The information should be available on alcohol containers as well as being available in other media. The label on the bottle may be the last (or perhaps the first) place a woman sees it before she takes a drink.

Question 8 is about the effectiveness of advisory statements. There is evidence that labels are effective. However, this is also an irrelevant question. Alcohol is a toxic drug, not a food and information about its toxicity should be available on the bottle or container irrespective of whether such information is effective.

Question 13 is about the likely impact on consumers, industry and the government if the status quo is maintained.

In addition to damage to the unborn foetus, alcohol causes many other well documented health problems. It contributes to teenage pregnancy, to suicide, and motor-vehicle accidents. Every year it contributes to thousands of cases of domestic violence, child abuse, aggravated assault and murder. Approximately 1,000 people in NZ die directly from alcohol related causes each year and up to another 2000 die each year from reduced life expectancy. Not forgetting that our prisons are overflowing with inmates whose offending occurred under the influence of alcohol and drugs – nor the estimated \$4 to \$16 billion cost to the taxpayer caused by all this damage every year.

The likely impact of maintaining the status quo is that the New Zealand consumer, the liquor industry and the government continue to live under the illusion that alcohol is a harmless food rather than a toxic drug and that as such, it does not merit placing a warning label on the container.

Relevant questions:

In my opinion, the only questions that FSANZ has posed which are really relevant to this discussion are questions 3 & 5. These are questions about what scientific evidence is available that alcohol causes FASD and the actual prevalence of FASD in Australia and New Zealand. The most up-to-date evidence and research available on this is provided in the ALAC submission.

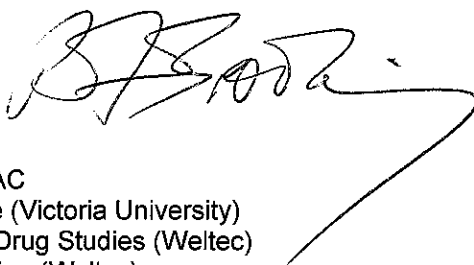
Conclusion:

Unfortunately there is a lack of definitive data on whether a small amount of alcohol is safe for pregnant women. Therefore the only safe option is complete abstinence during pregnancy. This is therefore the essence of this submission: alcoholic beverages should contain a warning label about the possible risk of birth defects from alcohol consumption during pregnancy.

Ideally alcoholic beverages should also contain warnings that drinking may lead to physical health problems such as cirrhosis of the liver, cancer and death. There should also be warnings that alcohol can lead to dependence and addiction. There should be warnings against drinking while driving or using other dangerous machinery. Unfortunately, these issues are not part of this submission.

A warning label against drinking while pregnant is a small but necessary first step in advising the public of the harm and requiring the liquor industry to take some ethical responsibility for the massive damage their product causes.

Yours faithfully



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