



Food Standards Australia New Zealand  
Canberra ACT 2610

SUBMISSION re: Application A576  
Labelling Alcoholic Beverages with a Pregnancy  
Health Advisory Label

The Alcohol Education and Rehabilitation Foundation Ltd(AER) supports this application by the Alcohol Advisory Council of New Zealand to vary the Australia New Zealand Food Standards Code to require a health advisory label on alcohol beverage containers advising of the risks of consuming alcohol when planning to become pregnant and during pregnancy.

As your Initial Assessment Report states, there is evidence "... that drinking alcohol during pregnancy can be associated with varying degrees of harm to the unborn child". The report also makes reference to the draft Australian Alcohol Guidelines for Low Risk Drinking released by the National Health and Medical Research Council in October 2007 in which NHMRC concludes, based on the available evidence, that not drinking alcohol is the safest option for women who are pregnant, are planning a pregnancy or are breastfeeding.

AER therefore supports option 2 as outlined in your initial assessment report because to maintain the status quo would continue to mean that consumers, in particular, have patently inadequate information on the potential for harm to the unborn from the consumption of alcohol during pregnancy.

Adoption of Option 2 would be positive for consumers, have limited impact (some minor costs) on industry and would be an enhancement to the broader alcohol harm reduction strategies of governments in Australia and New Zealand

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## OTHER COMMENTS.

AER has some further comments about the labeling of alcohol beverages which go to the issue of what is in the interest of public health and social outcomes in Australia of providing better information to consumers of alcohol about its potential harmful effects.

The first comment relates to the evident anomaly that a Food Authority is making a determination on a substance which is not a food. Alcohol is a psychoactive drug with powerful biological and behavioral effects as well as social and public health implications. As the World Health Organisation states, alcohol is no ordinary commodity, and it is certainly not an ordinary food.

Secondly, AER believes that a single health message label on alcoholic beverages raises two important issues. The first is that a health message about alcohol and pregnancy applies only to women of child bearing age and other consumers of alcohol may see that as the only harmful effect of drinking. It also has the potential to stigmatise pregnant women in the eyes of others if they are seen to drink while obviously pregnant.

The second issue is that there are many other harmful health effects from alcohol consumption about which consumers should be warned. Just as tobacco not only causes lung cancer but also causes many other harms, so alcohol is implicated in many cancers, obesity, diabetes, heart disease, liver disease, etc. Alcohol is also implicated in a range of social harms, including family violence, child abuse, sexual assault, personal assault, motor vehicle accident deaths, suicide, falls and many injuries.

The final point to be made relates to the desire of the Australian population for clearer information on the products it consumes. Labelling of food products is clearly designed to provide information so that consumers can make an informed choice about using or consuming a particular produce. No less a standard should be applied to alcohol.

Ian Webster AO  
Chairman