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“Submission

**Food Standards Australia New Zealand
Canberra BC ACT 2610**

INITIAL ASSESSMENT REPORT

APPLICATION A576

**LABELLING OF ALCOHOLIC BEVERAGES WITH A PREGNANCY
HEALTH ADVISORY LABEL”**

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A. I fully support the proposal for mandatory health advisory labels on all alcohol containers advising the risks of alcohol consumption to women planning to conceive and who are pregnant.

My reasons for making such a recommendation are as follows:

1. The grave risks associated with alcohol consumption by pregnant women is clearly recognised by authoritative bodies such as:

a) The World Health Organisation (WHO).

In the WHO’s “Framework for alcohol policy in the WHO European Region” it is stated that “*In the absence of demonstrated safe limits, abstinence from alcohol during pregnancy is recommended and should be encouraged*”.

b) The National Health and Medical Research Council(NHMRC).

The NHMRC’s proposed guidelines clearly recommend to women who are planning to conceive or are pregnant that “not drinking is the safest option”.

c) The medical and scientific community in general.

There is now scientific evidence for the adverse effect of alcohol on the brain of the fetus. Steps must be taken to minimise the adverse effect of alcohol on the fetal brain which is extremely sensitive to toxins and drugs.

d) The prevalence and impact of Fetal Alcohol Syndrome Disorders appears to be increasing. Consequently, in countries such as the USA, pregnant women or women planning to conceive are advised to “abstain from drinking”.

2. Similar warning labels are now advocated in many developed countries such as France etc. There is an imperative on Australia to ensure that its standards, keep up with what is now considered world’s best practice

3. The regulatory authority of Australia has a moral and ethical obligation to support and implement guidelines in line with current scientific knowledge. Anything inferior represents a compromise in the State’s duty of care towards its citizens.

4. Consumers have a right to be fully informed about the risks of consuming alcohol if pregnant or planning to be pregnant, as currently described in the modern scientific evidence base.

5. Many people will not access guidelines which are available via popular communication channels such internet, TV or radio advertising or libraries. Therefore, in order to maximise the likelihood that consumers will receive the appropriate health advice, it is essential that all alcohol containers are clearly and prominently labelled with the proposed health advisory label.

B. Suggested wording for the label might be:

“Warning: Alcohol is a poisonous drug and should not be consumed by women planning to conceive or pregnant.”.

There should also be a pictorial image clearly portraying the risk of consuming alcohol when planning to conceive and during pregnancy.

- C. Given that the risks associated with alcohol consumption are now recognised, the relevant regulatory bodies are ethically obliged to implement the proposed warning labels immediately.**
- D. The proposed “two year transition period” will have a quantifiable impact on many lives during this time that cannot be justified by any commercial considerations. The idea that the health of unborn children, who have not given consent to be exposed to the negative effects of alcohol, should be made secondary to commercial interests of the highly profitable alcohol industry is a totally absurd and inhumane argument. In the light of current scientific evidence, such reasoning might be interpreted as criminally negligent. Australian culture emphasises a “fair go for all” and this should include our unborn children, the future of this great country.**
- E. While, I support the initiative by FSA&NZ for pregnant women, I suggest that the advisory label include descriptions of harmful effect of alcohol on young people who are less than 25 years of age.**