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### Submission on Proposal P1050 – Pregnancy warning labels on alcoholic beverages

Thank you for the opportunity for Auckland Regional Public Health Service (ARPHS) to provide a submission on Proposal P1050 – Pregnancy warning labels on alcoholic beverages (the Proposal).

The following submission represents the views of ARPHS and does not necessarily reflect the views of the three District Health Boards it serves. Please refer to Appendix 1 for more information on ARPHS.

Yours sincerely



## Introduction

1. Thank you for the opportunity for Auckland Regional Public Health Service (ARPHS) to submit on Proposal P1050 – Pregnancy warning labels on alcoholic beverages. ARPHS' submission provides a brief overview of its position on mandatory pregnancy warning labels on alcoholic beverages, and addresses specific consultation areas of the Proposal as identified in FSANZ's submission template.

## C. Summary

2. ARPHS supports mandatory and consistent pregnancy warning labelling on packaged alcoholic beverages. It is one part of the solution to reducing the prevalence of Fetal Alcohol Spectrum Disorder (FASD). Despite insufficient data on the prevalence of FASD in New Zealand, existing studies indicate that FASD does have significant health and cost implications for New Zealand's society.<sup>1,2</sup>
3. We acknowledge the comprehensive assessment process undertaken by FSANZ for the Proposal, which included a literature review on the effectiveness of warning labels and consumer testing of warning statements. ARPHS supports the 'proposed approach' to many of the design labelling elements as outlined in the *Call for submission – Proposal P1050* document, and these matters are discussed below under the specified consultation sections.
4. Proposed design and implementation matters that warrant further consideration are also discussed, and relate to:
  - Location and label orientation, and
  - The requirement for pregnancy warning labels based on the percentage alcohol content by volume.
5. While ARPHS supports the Proposal, the implementation of mandatory pregnancy warning labelling represents only one step towards addressing FASD, and implementing labelling does not diminish the need for a comprehensive range of strategies and actions to reduce the prevalence of FASD, and other alcohol-related harms. Other such actions include:
  - Restricting the physical availability of alcohol
  - Increasing the minimum purchase age
  - Regulating/restricting advertising and sponsorship
  - Increasing the price of alcohol.

## F. Pictogram (section 3.2.2.2)

6. ARPHS supports the current pictorial design for use on New Zealand's pregnancy warning labels, based on the evidence regarding its effectiveness to:
  - Attract consumers' attention

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<sup>1</sup> Easton, B., Burd, L., Rehm, J., & Popova, S. (2016). Productivity losses associated with Fetal Alcohol Spectrum Disorder in New Zealand. *New Zealand Medical Association*, 129(1440 72), 72-83. Retrieved from [www.nzma.org.nz/journal](http://www.nzma.org.nz/journal)

<sup>2</sup> Ministry of Health. (2018). Fetal alcohol spectrum disorder. Retrieved from <https://www.health.govt.nz/our-work/diseases-and-conditions/fetal-alcohol-spectrum-disorder>

- Increase awareness of the potential harms to unborn babies when drinking while pregnant.

### G. Warning statement (section 3.2.2.3)

7. ARPHS strongly supports the warning statement “*Any amount of alcohol can harm your baby*” to accompany the proposed pictogram. This is based on its tested performance to be believable and credible to women of childbearing age and those in the proximate pregnant category.
8. ARPHS also supports the use of short and simple statements to improve the readability and consumer understanding of the desired public health message.
9. The 2018 Decision Regulation Impact Statement (DRIS) notes that a secondary objective of pregnancy warning labels on packaged alcoholic beverages is to provide information to the broader community about the need for pregnant women to not drink alcohol. We concur that providing information to the broader community by way of warning statement is useful to influence how people talk and make decisions about alcohol, and can support safer, alcohol-free pregnancies.

### H. Design labelling elements (section 3.2.2.4)

10. ARPHS supports the following proposed design labelling elements:
  - Warning label sizes: ARPHS believes that maximising label size will increase visibility and therefore advocates for larger sizes where feasible.
  - Colour and contrast elements to increase legibility.
11. However, ARPHS does **not** support the proposal to have unregulated orientations and locations for the warning label. Based on the evidence presented in the literature review, ARPHS suggests:
  - Prescribing the orientation of pregnancy warning labels to be horizontal to ensure such labels are noticed more quickly.
  - Placing the warning label on the front of alcoholic beverages to ensure visibility at all times. Findings from the FSANZ literature review indicate that warning labels placed on the front of alcoholic beverages will receive quicker and/or more attention than those placed elsewhere on the packaging. ARPHS acknowledges that wine products contravene free trade agreement requirements.

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

12. Of the two options under consideration, ARPHS is strongly in favour of option 2 because (as noted in the Proposal and DRIS) it more accurately reflects the Australian and New Zealand governments’ advice to not drink any alcohol during pregnancy.
13. There is no evidence for a safe level of alcohol consumption during pregnancy, therefore consistent messages on all beverages containing 0.5% ABV or more is recommended.

## Conclusion

14. Once again, thank you for the opportunity to provide feedback, and please do not hesitate to contact us should you require any clarification regarding the information contained in this submission.

## Appendix 1: Auckland Regional Public Health Service

Auckland Regional Public Health Service (ARPHS) provides public health services for the three district health boards (DHBs) in the Auckland region (Counties Manukau Health, Auckland and Waitemata District Health Boards).

ARPHS has a statutory obligation under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities in the Auckland region. The Medical Officer of Health has an enforcement and regulatory role under the Health Act 1956 and other legislative designations to protect the health of the community.

ARPHS' primary role is to improve population health. It actively seeks to influence any initiatives or proposals that may affect population health in the Auckland region to maximise their positive impact and minimise possible negative effects.

The Auckland region faces a number of public health challenges through changing demographics, increasingly diverse communities, increasing incidence of lifestyle-related health conditions such as obesity and type 2 diabetes, infrastructure requirements, the balancing of transport needs, and the reconciliation of urban design and urban intensification issues.