

## Attachment H – Submission Template

Please use the template below to provide your submission to Proposal P1050 – Pregnancy warning labels on alcoholic beverages. Please submit this to FSANZ as a word document (if required, a pdf of the submission may also be provided in addition to the word document).

For information about making a submission, including what your submission should include, visit the FSANZ website at [information for submitters](#).

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

A. Queensland Consumers Association, PO Box 261, Corinda, Q4075  
Vice President,

B. Executive

C.

### **Comments to specified sections of P1050 Call for Submissions (CFS) report:**

D. **Literature review on the effectiveness of warning labels (section 3.1.1 of CFS)**

We support FARE's comments.

E. **Consumer testing of warning statements (section 3.1.2)**

We support FARE's comments.

F. **Pictogram (section 3.2.2.2)**

We support FARE's comments.

G. **Warning statement (section 3.2.2.3)**

We support FARE's comments.

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

We support FARE's comments and in addition to facilitate consumer awareness and use of the information, we strongly support:

- Achieving the highest possible level of consistency between products and package sizes in the provision of the warning label
- Prescribing the orientation of the warning label by requiring that it be horizontal or displayed to be read in the same direction as the displayed name or brand of the product.

I. **Summary of proposed pregnancy warning label design (section 3.2.2.5)**

We support FARE's comments and in addition:

- To facilitate consumer awareness and use of the information, we strongly recommend that the print used for the warning statement should, in addition to being black, in sentence case and sans serif font type, **also be bold** (rather than, as current proposed, not bolded), **not italic** and **not condensed**.

- To facilitate consistent provision, and monitoring and enforcement of compliance, we recommend that how minimum font sizes will be measured in either mm or points be specified in the Code, or other written guidance be provided. This is required because print **height**, which is the relevant print size measurement, can be measured in several ways, especially for lower case print/a mix of lower and upper case print, which will be used for the warning statement. Also, print height (not print size/font) should be the term used, unless it is clearly indicated somewhere that print/font size means print height. We note that the Code refers to “size of type” not “print” or “font”.

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

We support FARE’s comments.

**K. Application to different types of sales (section 3.2.4)**

We support FARE’s comments.

**L. Application to different types of packages (section 3.2.5)**

We support FARE’s comments.

**M. Consideration of costs and benefits (section 3.4.1.1 of CFS)**

We support FARE’s comments.

**N. Transitional arrangements (section 4.1 of CFS)**

We support FARE’s comments.

**O. Draft variation to the Australia New Zealand Food Standards Code (Attachment A of CFS)**

We support FARE’s comments.

**P. Other comments (within the scope of P1050 – see section 1.5 of the CFS)**

We support FARE’s comments.