

Proposal P1050

Pregnancy warning labels on alcoholic beverages

Call for Submissions

Submission

NSW recognises that drinking alcohol during pregnancy can be associated with various types of harm to an unborn child. These harms may include physical, cognitive, behavioural and neurodevelopmental disabilities with possible life-long implications. Fetal Alcohol Spectrum Disorder (FASD) is an umbrella term used to describe the range of possible harms. FASD is preventable by avoiding alcohol consumption during pregnancy (National Health and Medical Research Council, 2009).

Overall NSW is supportive of the technical aspects of the proposed standard provided by FSANZ in the call for submissions, but requests additional clarification be added to the draft standard concerning location of the pregnancy warning label.

NSW considers the pregnancy warning label should be placed in a prominent and proximate location to other key labelling information provided on prescribed alcoholic beverages (i.e. located on the front or back of the main label applied to the bottle). NSW notes the intent of prominent location is already signalled by the draft standard through the use of words 'clearly discernible' (Standard 2.7.1-9 (2) concerning application of pregnancy warning labels on prescribed alcoholic beverages with more than 1 layer of packaging.

NSW would suggest that 'clearly discernible' should exclude labelling on the neck or base of a bottle, or providing the labelling on the inside of an outer package. The Decision RIS¹ provides a recommendation that location of the warning statement should be proximate to other information on the label. NSW suggests that FSANZ consider including additional text in the draft standard to provide certainty on this matter.

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.

¹ [Decision RIS 2018.pdf](#)