



Fetal Alcohol Network New Zealand

Kia ora everyone

A meeting was held in Auckland on Tuesday to discuss the proposal to place warning labels on alcohol containers regarding the dangers of drinking when pregnant. A comprehensive application document has been submitted to FSANZ by the Alcohol Advisory Council of New Zealand and submissions are being called for. Details regarding this can be viewed at:

<http://www.foodstandards.gov.au/standardsdevelopment/applications/applicationa576label3785.cfm>

This is an important issue and ALAC's submission needs the support of as many people, agencies and clinicians as possible.

For those who were too busy at the coalface to attend the meeting but would like to help, we have made it easy for you to make a submission based on the discussion at the meeting. You can simply copy and paste the following letter or adapt it to include your own points and send it off **before February 6th** addressed to:

Food Standards Australia New Zealand
P.O.Box 10559
Wellington
New Zealand

Or email to slo@foodstandards.gov.au

To Whom It May Concern

“Application A576 – Labelling of Alcoholic Beverages with a Pregnancy Health Advisory Label”

I wish to endorse the submission made by ALAC to place warning labels regarding the dangers of drinking when pregnant on alcohol containers.

It is reprehensible that a widely available and highly promoted toxic substance currently does not carry health warnings. There is a strong moral and ethical obligation to inform the public about the health risks of alcohol that transcends and outweighs any commercial imperatives or perceived value about the effectiveness of doing so.

Yours faithfully

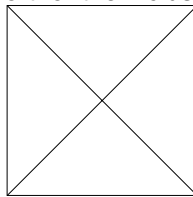
Add your name and contact details

Add the name of your agency and position where appropriate

Note: If you are sharing personal information in your submission that you do not wish placed on public record you need to state this clearly in your submission.

Key points discussed at the meeting were:

- Alcohol related harm is a deadly serious matter. Evidence of effectiveness is irrelevant in this labelling process. It is simply reprehensible that a widely available and highly promoted toxic substance should not be required to carry health warnings. There is a strong moral and ethical obligation to inform the public of the risk of consuming the product on the container that transcends and outweighs any commercial imperatives or perceived values of doing so.
- There is no greater imperative than protecting the fetus from the risk of birth defects and neurodevelopmental disorders when a pregnant woman consumes a product that is capable of causing irrevocable harm to her unborn child.
- Regardless of legal status, the fetus has a right to protective measures and there is a responsibility to take all reasonable steps to protect them from any product that can adversely affect their quality of life.
- A label would have three primary purposes: to inform, to remind and to reinforce other health promotion messages.
- One experience shared at the workshop was that when the teenage daughter was reminded by a parent about the risk of drinking during pregnancy the response was, "Why are you the only person I hear this from!!"
- A label will provide a platform for other public health education efforts such as an advertising campaign and posters where alcohol is sold as is required by law in the USA.
- A label may be the only consistent message that some people receive particularly those who are not well connected to healthcare services.
- There are strongly expressed media opinions against this move most of which is poorly informed that are undermining public health efforts. A clear statement on the product itself will help to counter misinformation.
- It is possible that avoiding alcohol can become socially desirable as occurred in California in the 70s.
- There are 15 questions that FSANZ are seeking feedback on. However you should not feel obliged to answer them all but rather address the ones that have significance and relevance to you. The ALAC application has already addressed these points which you could simply endorse. Any other research you include requires a reference.
- Your own knowledge and experience is valid and will provide valuable insights for their deliberations.
- There was general support for the inclusion of a graphic used by French legislators for



their alcohol containers. This can be a universally understood symbol and avoids the problem of illiteracy or having to read small print or translation. The French labelling requires either the symbol or the message, "Consuming alcoholic beverages during pregnancy, even in small quantities, can have serious effects on the health of the child" and needs to be prominently displayed.

- The revised Australian Drinking Guidelines and the high level medical and political support being expressed in Australia together with this being a New Zealand Government initiative are favourable for the success of this application.
- It is time to be bold in stating what is needed!

Any questions or problems, let me know!

Kind regards

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