

19 March 2020

Dear Minister,

IT IS TIME: PREGNANCY WARNING LABELS ON ALCOHOLIC PRODUCTS

The George Institute for Global Health's mission is to improve the health of millions of people worldwide. The George Institute's Food Policy Division works in Australia and internationally to reduce rates of death and disease caused by unhealthy diets by undertaking research and advocating for a healthier food environment.

Our Food Policy Division has long had an interest in the use of the food label as a public health intervention through our FoodSwitch program and associated work on areas of policy currently being considered by the Ministerial Forum including the Health Star Rating and added sugar labelling. This interest in labelling also extends to supporting the development of health warnings on alcohol products.

Women have a right to know if a product is going to cause harm to their unborn child.

Alcohol is a 'teratogen', a known substance that can cause birth defects. Alcohol is the leading cause of non-genetic developmental disability in Australia in the form of Fetal Alcohol Spectrum Disorders (FASD). Yet one in four pregnant women in Australia continue to drink alcohol after knowledge of their pregnancyⁱ, resulting in approximately 75,000 alcohol-exposed pregnancies annually. One reason that women continue to drink is that they are unaware of, or underestimate, the severity of the risk. Our research shows that older pregnant women in particular can be unaware of the potential risks of alcohol for the unborn childⁱⁱ.

Australians expect dangerous products to carry warnings of the specific risk. In October 2018, the Ministerial Forum on Food Regulation decided to mandate a pregnancy warning label to ensure that Australians could make informed decisions when pregnant or planning a pregnancy.

Food Standards Australia New Zealand (FSANZ) recently concluded their recommendation for a mandatory standard for pregnancy warning labels. This two-year process included a systematic evidence review, consumer testing and extensive consultation with the alcohol industry and health groups.

FSANZ is a trusted and authoritative expert in this process, and each detail of its proposal was costed and recommended only if it was necessary for effectiveness. As FSANZ highlights:

"Consumers do not look for warning labels therefore they must be presented in a way that is



likely to attract attention in order to achieve their purpose. Given evidence that the size, location, colour, contrast and signal words can all help enhance the noticeability of a warning label, FSANZ has decided certain design elements of the pregnancy warning label should be prescribed in the Code. Such an approach will help achieve consistency and certainty in presentation of the warning label across the alcoholic beverage sector, help ensure the warning label is legible and attract attention.ⁱⁱⁱ

Red is an essential component of the label as it clearly indicates a warning. In consumer research, 97% of New Zealand respondents associated the red and black pictogram with a warning compared to 1% of respondents associating a black and grey pictogram with a warning. Red also increases the speed of identification and level of attention the warning receives.^{iv}

Women and their children have been waiting too long already for this teratogen to be labelled appropriately, with a label that is seen, understood, believed and trusted. We strongly urge you to confirm the FSANZ decision at the upcoming meeting of the Forum of Food Regulation.

If you require more information, please do not hesitate to contact me at spettigrew@georgeinstitute.org.au. We look forward to your response and consideration to our request for mandating a pregnancy warning label.

Sincerely,

Professor Simone Pettigrew
Program Head, Food Policy Division
The George Institute for Global Health, Australia

ⁱ Australian Institute of Health and Welfare. *National Drug Strategy Household Survey 2016: detailed findings*. (2017)

ⁱⁱ Pettigrew, S., Jongenelis, M., Chikritzhs, T., Pratt, I. S., Slevin, T., & Glance, D. (2016). A comparison of alcohol consumption intentions among pregnant drinkers and their nonpregnant peers of child-bearing age. *Substance use & misuse*, 51(11), 1421-1427.

ⁱⁱⁱ Food Standards Australia/New Zealand (FSANZ) (2020) *Approval Report – Proposal P1050 Pregnancy warning labels on alcoholic beverages*

^{iv} Food Standards Australia/New Zealand (FSANZ) (2019) *Pregnancy warning labels on packaged alcohol: A review of recent literature*