The Hon Richard Colbeck
Minister for Aged Care and Senior Australians, Minister for Youth and Sport
PO Box 6100, Parliament House CANBERRA ACT 2600
senator.colbeck@aph.gov.au
17 March 2020

Dear Minister,

IT IS TIME: PREGNANCY WARNING LABELS ON ALCOHOLIC PRODUCTS

The Public Health Association of Australia writes to ask you to support the Food Standards Australia New Zealand (FSANZ) decision on mandatory pregnancy warning labels on alcoholic products, at the upcoming meeting of the Forum on Food Regulation.

Clearly the Forum understands the necessity of mandatory labelling. One in four pregnant women in Australia continues to drink alcohol after knowledge of their pregnancy and one reason is that they are unaware of, or underestimate, the severity of the risk.

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 highlight, 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. The size, location, colour, contrast and signal words can all help enhance the noticeability of a warning label. Red is an essential component of the label as it clearly indicates a warning. In consumer research, 97% of respondents associated the red and black pictogram with a warning compared with 1% for black and grey. Red also increases the speed of identification and level of attention the warning receives.

If the DrinkWise voluntary label was effective, it would have led to a strong decline in the number of women drinking while knowing they are pregnant, and FSANZ’s review of the evidence would have recommended the voluntary label be made mandatory as is. Neither happened.

Industry have claimed that the red colour will be too difficult and expensive to incorporate into their labels, but labels are routinely printed in multiple colours, including red, to attract attention for temporary promotions. On the next page of this letter are numerous examples of colourful, short-term label changes.

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

Yours sincerely,

Terry Slevin
Chief Executive Officer
Public Health Association of Australia

