

**Food Standard Australia and
New Zealand's
P1050 – Pregnancy warning
labels on alcoholic
beverages**

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Food Standards Australia New Zealand's P1050 – Pregnancy warning labels on alcoholic beverages consultation.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

General Comments

4. NMH fully supports the introduction of mandatory pregnancy warning labels on all alcoholic beverages.
5. This reflects New Zealand government advice not to consume any alcohol during pregnancy due to an association of various types of harm to the unborn child.
6. Mandatory pregnancy warning labels on all alcoholic beverages will enhance awareness for women not to drink alcohol if they are pregnant, thinking about getting pregnant or behaving in a way that could result in a pregnancy. This will also aid understanding of the risks to a greater audience who may have the opportunity to influence and support a woman's decision to drink alcohol prior to conception and/or during pregnancy.

Specific Comments

7. D. Literature Review:

The literature review provides valued information for the formation of Proposal P1050.

8. E. Consumer testing of Warning Statements

NHM supports the approach used for consumer testing of warning statements.

9. F. Pictogram

NMH supports the use of the proposed pictogram to be part of the mandated pregnancy warning label.

10.G. Warning Statement

NMH supports the inclusion of the word 'unborn' in the pregnancy warning label – "Any amount of alcohol can harm your *unborn* baby".

11.H. Design labelling elements

NMH supports the design labelling elements

12.I. Summary of proposed pregnancy warning label design

NMH supports an overall increase in label size which will result in labels being more noticeable to consumers.

13.J. Beverages to carry the pregnancy warning label

NMH supports Option 2: beverages containing 0.5% ABV or more to be required to carry the pregnancy warning label.

Products such as brewed soft-drinks that have an alcohol content may be consumed frequently or in higher concentrations during pregnancy. Therefore NMH supports Option 2 as this approach aligns with current messaging that there is no known safe level of alcohol when pregnant.

14.K. Application to different types of sales

NMH agrees with the proposed approach for the application of pregnancy warning labels to different types of sales.

15.L. Application to different types of packages

NMH supports requirements for pregnancy warnings labels on all layers of packaging – this will ensure that the purchaser of the product (at point of sale) and the consumer (at point of consumption) have the option to see a pregnancy warning label.

16.M. Consideration of costs and benefits

NMH notes the comparison of costs and benefits.

17.N. Transitional arrangements

NMH would like to see the transition period to be one year with a limit tiered approach for specified beverages as necessary. This length of transition will not compromise intended public health outcomes.

18. **Conclusion**

NMH thanks the Food Standard Australia New Zealand for the opportunity to comment on P1050 – Pregnancy warning labels on alcoholic beverages. NMH believes that the introduction of mandatory pregnancy warning labelling will provide extended exposure of this key message. In conjunction with other related measures, the increased level of knowledge and awareness that will result will help to safeguard future generations of New Zealanders.

Yours sincerely



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