

# WOMAN'S CHRISTIAN TEMPERANCE UNION OF N.S.W. INC.

"THE CHELSEA" 54/110 SUSSEX ST., SYDNEY 2000      PHONE: 262 5949

FOR GOD, HOME AND HUMANITY

ESTABLISHED 1882

## SUBMISSION

### APPLICATION A576 – Labelling of alcoholic beverages with a pregnancy health advisory label

The Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA BC ACT 2610

Dear Sir/Madam,

We wish to support Application A576 requiring a health advisory label on all alcoholic beverage containers advising of the risks of alcohol consumption when planning to become pregnant and during pregnancy.

AFS and FASD are community problems causing much heartache for parents of children affected by these fully preventable maladies, not to mention the intellectual and physical disabilities caused to their children.

We trust that the importance of alcohol labelling will be recognised by those having this significant decision to make.

Yours sincerely,

*Mary Fraser*

Legislation Officer for the NSW Woman's Christian Temperance Union

## INTRODUCTION:

This submission will predominately address the argument that health labelling of alcohol products should be a legal requirement. It will discuss the insufficiency of available information on FAS/FASD, medical/scientific evidence of the number of FAS/FASD children in Australia, the problem of consistency in the labelling of dangerous goods and the known benefits of such labelling. It will also recommend the wording for captioning/labelling.

## LACK OF AVAILABLE INFORMATION ON FAS/FASD

There is very little information in the public arena, with no national standard advice on drinking during pregnancy. The NSW Government has reported that it is researching new alcohol pregnancy guidelines but no new guidelines have been advised or advertised as yet. The National Drug Strategy FAS Literature Review has not been the subject of national research or policy development in Australia, according to the "Healthy Women – Healthy Communities" policy research paper, Feb, 2005. Smaller groups like the Drug Awareness Council, the National Council of Women and the Woman's Christian Temperance Union have endeavoured to distribute literature to high schools and libraries in some areas of NSW and in other States but these efforts are inhibited by financial and distribution costs. Notwithstanding the efforts of such groups, the effectiveness of such campaigns is miniscule compared to the overwhelming effectiveness of alcohol advertising which promotes the pleasures and sociability of drinking alcohol. Therefore the associated dangers of drinking alcohol, including those of FAS/FASD need a more effective vehicle of dissemination. One effective means is labelling.

## EVIDENCE OF THE NUMBER OF FAS/FASD CHILDREN IN AUSTRALIA

Diagnosis of FAS/FASD is frequently missed at birth (FAS study: Bower, Elliott, Hahn). However, as more studies are done, it is realised that symptoms of these disorders are being recognised by doctors, teachers and other responsible community people in some of our children. H.M.Barr and A.P.Streissguth (Foetal Alcohol Drug Unit, UW School of Medicine) have stated that the incidence of FAS has been estimated at 1-3/1000 live births and FASD at 1/100 live births. The Salvation Army in Australia has estimated that there are 200,000 FAS and FASD sufferers in our country. These afflictions are completely preventable by the mothers' abstinence from alcohol prior to and during pregnancy. A Warning label on alcoholic containers specifically targeting the danger to their babies of drinking alcohol whilst pregnant would be an instant deterrent to every woman who has the best interests of her baby at heart.

## THE PROBLEM OF CONSISTENCY IN LABELLING

The labelling of potential harmful effects is commonplace in every area of wholesaling and retailing of drugs (including tobacco) except alcohol products. It is inconsistent not to

have labelling on alcohol products. In the international system, labelling is already there. Our own wineries must label for export. Why not label for domestic use? The advertising and promotion of alcohol has exploded without sufficient balance in advertising its dangers. Almost all analgesics and other drugs have to carry a warning label ("see your doctor if symptoms persist" etc.) This is standard practice in other developed societies. The alcohol industry has fought for years to have the "benefits" of drinking alcohol accepted, as in their campaign to have red wine accepted as a health food (good for the arteries!) but will not accept responsibility for the deleterious effects of alcohol on the body. They protest that the costs of labelling alcohol containers will be prohibitive, but the costs of such labelling incurred by the liquor industry is negligible compared to the profits made by them.

A written statement PLUS a pictorial image will emphasise the importance of an FAS/FASD message. Some suggestions:

"Drinking alcohol while pregnant may harm your baby."

"Avoid alcohol when pregnant. It can endanger your baby."

"Pregnant? Protect your baby. Avoid alcohol."

The French motif of a pregnant woman drinking, with a line crossed through it, thus: would be applicable for Australia as some road signs, park signs etc. use a crossed line to designate that some speeds, dogs in parks and so on are not allowed.

