

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.

I am a New Zealand born Pacific Islander residing in Dunedin in pursuit of studies. I am writing in support of warning labels on alcohol containers, because I know people who are affected by FASD by reason of not knowing how early on in the pregnancy one can be affected by alcohol, no awareness etc...

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

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Question 9 – What wording for a statement about the risk of consuming alcohol when planning to become pregnant and during pregnancy would be appropriate on an alcoholic beverage container to raise awareness in pregnant women and women planning to become pregnant?

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.

I recommend the picture and wording compile by S. Simi for her submission to FSANZ for this matter.

1. 

2. **X** - hard to see the words



- Picture/silhouette is the France logo copied from the FSANZ's Initial Assessment Report.
- “If you are pregnant, planning to become pregnant, or in a situation where you could become pregnant, don't drink alcohol.” Kitson, K (2004)

Below are key points discussed at a meeting held by FSANZ on Tuesday the 15th of January, 2008. I strongly agree with these points and wish to add these to my submission:

- 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 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

In conclusion I would like to reinforce that I wish to endorse the submission made by ALAC to place warning labels regarding the dangers of drinking when pregnant on alcohol containers for reasons stated above.