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1 February 2008

Food Standards Australia New Zealand
P.O.Box 10559
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New Zealand

Dear Sir

Application A576 – Labelling of Alcoholic Beverages with a Pregnancy Health Advisory Label

I support application A576 made by the Alcohol Advisory Council of New Zealand to require a health warning label on alcohol containers advising women to avoid drinking alcohol when pregnant.

My academic research on alcohol and pregnancy and on Fetal Alcohol Spectrum Disorder has shown that there is no known safe level of alcohol consumption during pregnancy. Therefore women planning a pregnancy and women who are pregnant should be advised not to drink alcohol.

This is consistent with Ministry of Health Guidelines. It is vitally important that this advice is backed up and promoted by as many means as possible.

In the USA, analysis undertaken regarding the impact of alcohol beverage warning labels found there to be an increase in awareness and knowledge of FASD among the general public, and in particular, in young women (1,2).

Evidence in New Zealand points to an increase in the amount and frequency of drinking by women and young women in particular. This may place them at increased risk of an unplanned and unconfirmed pregnancy being exposed to alcohol before they ever seek the services of a health professional.

A health warning on alcohol containers would act as a prompt to consider the possibility of such a risk for women who are sexually active and consuming alcohol.

1. Abel E. Prevention of alcohol abuse-related birth effects – I. Public education efforts. *Alcohol and Alcoholism* 33: 411-6. 1998
2. Eustace L, Kang D, Coombs D. Fetal alcohol syndrome: a growing concern for health care professionals. *Journal of Obstetric, Gynecologic and Neonatal Nursing* 32: 215-21. 2003

Advice to avoid alcohol during pregnancy delivered clearly and consistently by a health professional is very important for ensuring the healthy outcome of any pregnancy. However, despite best efforts, many pregnant women remain poorly connected to healthcare services for a number of reasons including lack of transport, care of other children, culture, ethnicity, violent relationships or their socio-economic situation or simply by choice. Others may not engage with a midwife until well into the pregnancy. A message about the risk of exposing an unborn baby to alcohol stated on the container may be the only way this information is conveyed directly to them.

In the absence of reinforcing information on the actual product, any advice from a health professional is diluted. Alcohol is a highly promoted substance in common use by women of reproductive age, their partners, friends and families. There are still many mixed and confused messages about alcohol from a multitude of sources such as the media, friends and family, the internet and even from within the health profession. A clear message on the product that is consistent with current evidence is vital to allow women the opportunity to resist the pressure to drink and to make a healthy choice for themselves and their baby.

I also support the requirement of a prominent pictorial image to accompany a written statement. For many people in New Zealand English is a second language or and there are also poor levels of literacy. A pictorial image that clearly conveys the message to avoid drinking alcohol during pregnancy would be far more effective than text alone. The image needs to be clearly visible in a prominent position on the container and distinguishable from the background.

I strongly urge FSANZ to adopt the labelling of alcoholic beverages with a pregnancy health advisory label, in the best interests of children and families in New Zealand. In particular women have a fundamental right to be well informed about any substance they consume that may adversely impact on the health of their baby.

Yours faithfully

Frances Voykovich