

Food Standards Australia New Zealand /
Te Mana Kouna Kai – Ahiterereiria me Aotearoa

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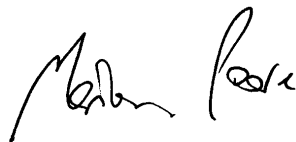
Standards Management Officer

APPLICATION A576 LABELLING OF ALCOHOLIC BEVERAGES WITH A PREGNANCY
HEALTH ADVISORY LABEL

Please find enclosed a submission from Public Health South.

For any further information please contact the undersigned.

Yours sincerely



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a service entity of HealthCare Otago Ltd

Submission from Public Health South (PHS)

- 1) Public Health South is one of 12 Public Health Units in New Zealand and is owned and governed by the Otago District Health Board. It provides a regional public health service to 288,000 people who live in Southland and Otago. Public Health services are offered to populations rather than individuals and are considered a “public good”. They fall into two broad categories – health protection and health promotion and aim to create or advocate for healthy social, physical and cultural environments. Public Health practitioners utilise population data to identify health issues and develop appropriate services aimed at improving health outcomes and protecting health gains.
- 2) Public Health South supports Option 2: Amend the Code to require a health advisory label on alcoholic beverage containers advising of the risk of consuming alcohol when planning to become pregnant and during pregnancy, i.e. the inclusion of prominent warning labels on alcohol containers for the following reasons:
 - a) Alcohol is a toxic substance that is often consumed irresponsibly and is known to cause irreversible health damage¹.
 - b) Warning labels can strengthen people’s intention to change drinking patterns and raise general awareness of the hazards.² This in turn contributes to the contemplation stage of the Transtheoretical Model of Change.³
 - c) It is a signal to society that government is taking alcohol issues seriously⁴ and supports the Ministry of Health’s policy that ‘drinking whilst pregnant is harmful’.
 - d) Risk taking behaviour and risky sexual behaviour in particular, is often preceded by alcohol consumption.
 - e) There is a trend towards drinking directly from containers e.g. RTDs, so that the messages are more likely to be viewed by the consumer.
 - f) Consumers need to be made aware of the levels of consumption at which health effects may result and the quantity of alcohol in terms of “standard drinks” that each container delivers.
- 3) Public Health South recommends:
 - a) That warnings should cover the wide range of alcohol related health risks, including foetal alcohol syndrome, drink driving, cirrhosis of the liver, brain damage etc.
 - b) That alcohol warnings should be introduced as part of a broad spectrum of harm reduction strategies including information about “standard drinks” and safe drinking and the fact that there is no safe limit in pregnancy⁵.
 - c) That size and placement of alcohol warnings should be legislated to ensure they are prominent and effective.
 - d) That further research into the effectiveness of labelling is carried out in the New Zealand environment.

¹<http://www.moh.govt.nz/alcohol> Accessed 2 /02/08

²Babor et al.(2003). Alcohol: No ordinary commodity: Research and public policy. Oxford University press.

³ Prochaska, J. O. (1994). Strong and weak principles for progressing from precontemplation to action on the basis of twelve problem behaviors. *Health Psychology*, 13, 47-51.

⁴ www.phru.ac.nz accessed 5/02/08

⁵ www.ALAC.org.nz accessed 2/02/08