



Urgent Action: Warning Labels needed to prevent Fetal Alcohol Spectrum Disorder

Issued June 2020

On 17 July 2020 a meeting of Commonwealth, State and Territory Ministers will meet at the Forum on Food Regulation. One of the issues they will consider is the recommendation from Food Standards Australia New Zealand (FSANZ) for warning labels on alcohol products about the dangers of consuming alcohol while pregnant. FSANZ is a government body that makes recommendations based on the best public health advice. At a previous meeting in March 2020, some of the Ministers rejected the advice of FSANZ on the basis it would cost the alcohol corporations too much money to put an effective warning label on the alcohol products.

Letters are urgently needed to be sent to the relevant Victorian Ministers urging that they listen to the advice of public health experts when it comes to effectual warning labels to help prevent Fetal Alcohol Spectrum Disorders.

Drinking alcohol while pregnant can lead to Fetal Alcohol Spectrum Disorders for the child. Fetal Alcohol Spectrum Disorders (FASD) are the leading cause of preventable developmental disability in Australia. It affects between 2% and 9% of babies. It impacts an estimated 12% of babies born in First People communities. Children suffering FASD have a range of difficulties in their lives, depending on the severity of their condition. Symptoms include, but are not limited to; learning deficits, difficulty with ordinary routines in life such as getting showered, dressed and to school or work in the morning, difficulty in social situations and management of emotions and impulsivity.

Thousands of children are born each year with FASD.

People who develop FASD are more likely to behave in ways that lead them to have contact with the criminal justice system. A 2018 study found that 36% of people in youth detention in WA had FASD. One Canadian study found youths with FASD are 19 times more likely to be incarcerated than youths without FASD.

FASD is also a problem that disproportionately impacts on First Peoples and contributes to First People being imprisoned at higher rates than non-Indigenous Australians. The Royal Australian and New Zealand College of Obstetricians and Gynaecologists reported that while First People women are less likely to consume alcohol than non-Indigenous women, those who do are more likely to drink in harmful amounts. FASD is up to four times higher in First Peoples.

In December 2019 the Aboriginal Medical Services Alliance Northern Territory called for legislated labels on alcohol beverages to warn of the dangers of drinking while pregnant. The Central Australian Aboriginal Congress also called on the Australian Parliament to implement warning labels. They expressed their frustration that “Unfortunately, largely due to the direct and indirect influence of the alcohol lobby, debate on the implementation of such labels continues.”

“The Jesus we know from the Gospel stories, calls leaders to use their power in service to others, to call forth in others compassion, justice and kindness, unity and community.”
Dr Deidre Palmer, President, Uniting Church in Australia from pastoral letter on “Racism and Police Brutality”, 3 June 2020.

The alcohol corporations have been able to run interference in the adoption of a warning label. It is hard not to conclude from their behaviour they are happy to put their obsession for maximising their profits ahead of preventing the severe life-long suffering caused by FASD. As stated by Australian Grape & Wine, the peak body for wine producers, in November 2019 they are concerned that the warning label recommended by FSANZ represents an “unnecessary imposition of costs on Australian wine businesses.” The Commonwealth House of



Representatives Standing Committee on Social Policy and Legal Affairs recommended in 2012 that FSANZ mandate a health advisory label to advise women not to drink when pregnant. The Parliamentary Committee recommended that the label be implemented by 1 January 2014.

Instead, it was left to the alcohol corporations to half-heartedly voluntarily place labels on their products. An evaluation commissioned by the Commonwealth Government in 2017 found that fewer than half of all packaged alcoholic beverages available for sale in Australia carried some sort of label about drinking during pregnancy. Even when the label is present it is ineffective, with consumer testing showing that it leaves some women thinking it is okay to drink alcohol when pregnant.

Focus groups of Australian women interviewed in 2018 found that alcohol consumption during pregnancy was seen as being at least somewhat acceptable. One of the reasons for that belief was a feeling there were no clear guidelines on alcohol consumption for pregnant women, or that the evidence is conflicting. Thus, a warning label needs to be clear and explicit in warning of the danger of any alcohol consumption during pregnancy.

A well-designed, effective label can change behaviour. A recent real world trial compared alcohol consumption in neighbouring regions in Canada. In one region alcoholic beverages carried a health warning labels and in the other region there was no warning label. It found a statistically significant decrease in alcohol consumption in the region with the warning labels. The research is particularly strong because it is a real world experiment conducted in the general population.

What you can do

Write polite and respectful letters to:

The Hon. Jenny Mikakos
Minister for Health
Level 22, 50 Lonsdale Street
Melbourne, VIC 3000

The Hon. Jaclyn Symes
Minister for Agriculture
Level 36, 121 Exhibition Street
Melbourne, VIC 3000

E-mail: minister.health@health.vic.gov.au

E-mail: jaclyn.symes@parliament.vic.gov.au

Salutation: Dear Minister

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Points to make in your letters:

- Thank the Victorian Government for following the advice of public health experts in responding to the COVID-19 crisis and saving lives.
- Ask that they take the same approach to provide warning labels on alcohol products to prevent Fetal Alcohol Spectrum Disorders.
- Express concern that only some alcohol corporations have so far applied a warning label. Even where a warning label has been provided, it has ignored expert public health advice.
- Point out that watering down the warning label through changes to its colour, size or wording would be risking the health and well-being of thousands of Australians for years to come.

You can also sign an open letter online calling on the Ministers to implement effective warning labels. The letter has been created by parents and carers of people with FASD, people with FASD and public health groups. You can sign by going to <https://visiblehealthwarning.org/>